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April 18, 2016

Policy Implementation and Dissemination on Campus: Student Perceptions of Sexual
Misconduct Policy and Title IX Compliance

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An abstract of
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Abstract

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This study considers the creation of sexual misconduct policy by American colleges and universities as required by Title IX of the Educational Amendments Act of 1972. As interpretation of Title IX has changed over time, so has general understanding of its requirements to institutions of higher education, leading to confusion and inconsistent policy implementation. While data demonstrate that incidence levels of sexual assault on campus have remained consistent for decades, the number of reports filed by students has increased significantly, indicating a need for established policies and processes to respond to such crimes. Using six colleges and universities, three public and three private, this project evaluates the level of compliance with federal guidance based on Title IX as published in *Not Alone*, the first report of the White House Task Force to Protect Students from Sexual Assault. To determine how compliance affects student perception of the policy, data from a Campus Climate Survey conducted at 26 institutions within the Association of American Universities gauging student confidence in and knowledge of the policy and reporting process was gathered for the six case studies. Also considered was the availability of the policy online and any recent activity from the Office for Civil Rights in investigating the institutions. No clear relationship exists between level of compliance and student perceptions as measured in this study. Further research should use other sources to operationalize compliance and develop more factors across a greater number of institutions to thoroughly investigate the variance in student perceptions on campus.

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Introduction to Problem and Project

The issue of sexual assault on college campuses in the United States is not new. As an issue area, though, campus sexual assault is continually misunderstood and under-researched. Moreover, studies in past decades have indicated the incredible under-reporting of sexual assault experienced by college students. While 25% or more of women and 6% or more of men in college experience attempted or completed sexual assault, fewer than 10% of these individuals report the crime to campus officials and fewer than 5% report these instances to the police (Fisher et al 2003; Krebs et al 2007; Gross et al 2006).

Efforts by the federal government and American colleges and universities have targeted this discrepancy, as studies find consistent incidence rates of sexual assault on campus, while reports to college administration have increased by more than 50% between 2008 and 2014 (Department of Education Cutting Tool). Still, in 2011-2013, 45% of all residential four-year colleges in the United States reported zero sexual assaults, with nearly 20% more reporting only one or two in that period. In total, 71% of these colleges and universities indicated three or fewer sexual assaults over those two years, in contrast to anonymous surveys investigating prevalence (Department of Education Cutting Tool, Accessed 2016). Similarly, in 2015 a survey of presidents of institutions of higher education determined that about only 5% of presidents agree or strongly agree that sexual assault is prevalent at their institution. However, 32% agree or strongly agree that sexual assault is prevalent at colleges and universities in the United States generally. More than three out of four agree or strongly agree that their institution is “doing a good job protecting women from sexual assault on campus” (Jaschik and Lederman, 2015).

This project aims to consider compliance of campus sexual misconduct policies with Title IX requirements, and how students perceive these policies. Those policies which comply

more fully with federal guidelines may be considered as more fully implemented in terms of Title IX. The existence of these policies alone, however, is not the end of the story. While Title IX as a law does not apply to students on college or university campuses, it does require schools to address sexual assault as it occurs and is reported. It follows, then, that students ought to be well informed of the process by which their respective institutions adjudicate and respond to sexual assault. As such, this project will consider student perceptions of their own knowledge on the policy and reporting process, as well as their confidence on many vital aspects of the policy and process. An additional factor, the availability of sexual misconduct policies on university websites, will also be investigated in order to potentially bridge the gap between policy as written and student perceptions.

History of Title IX

In 1972, Congress passed Title IX of the Educational Amendments to the 1964 Civil Rights Act (hereinafter Title IX), prohibiting discrimination on the basis of sex (20 U.S.C. §§ 1681-1688). Initially, interpretation of Title IX centered on athletics, requiring equal funding for men's and women's sports teams (Johnson 2015). The 1970 Congressional hearing that ultimately led to Title IX itself focused on the application for athletic programs at institutions of higher education, although the law applies to all levels of schools including elementary¹ (OCR 1979). Since passage, the interpretation and understanding of the requirements of Title IX have evolved and shifted. As a result, the meaning of compliance with Title IX has changed drastically over time, complicating efforts to comply. Crucially, the interpretation eventually

¹ While Title IX does apply to all levels of schooling, the instant work will focus on institutions of higher education unless otherwise denoted.

began to encompass response to sexual assault in schools, but not for over two decades after the legislation was first passed.

In 1979, the Department of Health, Education, and Welfare (HEW), known now as the Department of Health and Human Services (HHS), and originally tasked by Congress to administer Title IX, published “Title IX and Intercollegiate Athletics” to explain the compliance standard for Title IX (Johnson 2015). The following year, authority over Title IX moved from HEW to the Department of Education, with primary oversight of Title IX residing within the Office for Civil Rights (OCR). Over the next decade, OCR issued guidance and statements on how to implement Title IX within the framework of athletics. It wasn’t until 1997, 25 years after the passage of Title IX, which OCR established that its mandate extended to protection against sexual harassment.² This was due to a combination of increased literature on sexual harassment as well as dedicated advocates against sexual violence (Johnson 2015).

The 1997 OCR Sexual Harassment Guidance explained, “sexual harassment of students is a form of prohibited sex discrimination” (OCR 1997). For a behavior or action to be considered sexual harassment, it had to be “sufficiently severe, persistent, or pervasive to limit a student’s ability to participate in or benefit from an education program or activity, or create a hostile or abusive educational environment” (OCR 1997). Further, it asserted that schools must have “prompt and equitable grievance procedures through which students can complain of alleged sex discrimination, including sexual harassment.” The limited data available on collegiate efforts to adjudicate or otherwise respond to sexual harassment or assault in this era

² The terms sexual harassment, sexual assault, and sexual misconduct are all used throughout this work to refer to conduct or actions of a sexual nature that are taken against the freely given consent of one or more parties. Where the legal difference between these terms is especially relevant, it will be specifically indicated.

show that fewer than half of all institutions of higher education processed a single report in the period of 1993-1996 (Lowery et al 2000; Johnson 2015).

To account for the perceived discrepancies in handling sexual assault across different campuses, Congress in 1999 asked the National Institute of Justice (NIJ) to research relevant policies of institutions of higher education (McMahon 2008; Johnson 2015). Of the more than 1,000 policies reviewed, the results demonstrated “substantial confusion and inconsistency” amongst the colleges and universities (McMahon 2008; Johnson 2015). In 2001, to respond to the needs of the colleges, the OCR Sexual Harassment Guidance was revised, and the Department of Justice clarified compliance guidelines in its Title IX Legal Manual (NCWE 2008).

By this time, both the Violence Against Women Act (1994) and the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Act (1990) had been passed, demonstrating the increased federal attention to the issue of sexual harassment. While the Violence Against Women Act does not specifically apply to colleges and universities, the Clery Act mandates that all colleges and universities receiving federal funding must maintain records and regularly disclose pertinent information regarding crimes that occur on or near campus (20 U.S.C. § 1092).

Throughout the 21st century, OCR has communicated new aspects and requirements of Title IX through several Dear Colleague Letters (DCL). Notably, the 2011 DCL supplements the 2001 Sexual Harassment Guidance and answers mounting questions about sexual violence cases from policy to investigation procedures to appropriate remedies, as well as the interplay between Title IX and other legislation such as the Clery Act (OCR 2011).

In April 2014, OCR published a follow-up to the 2011 DCL, detailing guidance in a question-and-answer format (OCR 2014). A 2015 Dear Colleague Letter further describes the role of the Title IX Coordinator on campus, and suggests that the institution's website "prominently display" information about the Title IX coordinator and policy and grievance procedures on the university website (OCR 2015).

OCR may enforce compliance with Title IX in a variety of ways, including Dear Colleague Letters, compliance reviews, and investigating complaints received by individuals at the institutions. If a violation is discovered, it is grounds for termination of federal funding, but the institution may first elect to resolve the demonstrated issues based on a tailored report for the school (Johnson 2015). Since the 2011 Dear Colleague Letter, due to a combination of compliance reviews and specific complaints filed by individuals at the respective institutions, OCR has handled 243 investigations on colleges and universities. In the last two years, OCR has initiated 176 new investigations and as of January 2016 had completed only 20 of those. Between May 2014 and December 2015, the department's list of colleges and universities under investigation increased more than threefold, from 55 to 161³ (Department of Education Cutting Tool). In comparison, OCR resolved 174 cases total between 1997 and 2011 (Johnson 2015).

Despite the many Dear Colleague Letters provided to assist colleges and universities in policymaking since declaring the Title IX requirement to address sexual assault on campus, many schools continually fail to adopt appropriate policies. While OCR has not issued a model policy, the 2014 First Report of the White House Task Force to Protect Students from Sexual Assault (*Not Alone*) included detailed guidelines of the aspects of a fully compliant sexual misconduct policy (White House Task Force 2014). This list includes 60 individual items to

³ Some institutions are under investigation for multiple cases, bringing the number of open cases higher than the number of universities implicated.

include in a policy, though the guidelines do not outright state that the absence of any one of these would in itself be considered a violation of Title IX. The 2001 Sexual Harassment Guidance outlined the broad requirements for Title IX compliance, though not such a detailed list of items a policy should include as that found in *Not Alone*. These included:

1. “The school has a disseminated policy prohibiting sex discrimination under Title IX and effective grievance procedures;
2. The school has appropriately investigated or otherwise responded to allegations of sexual harassment; and
3. The school has taken immediate and effective corrective action responsive to the harassment, including effective actions to end the harassment, prevent its recurrence, and, as appropriate, remedy its effects.”

Importantly, this guidance noted that the existence of sexual assault on campus would not render an institution in violation of Title IX, as the policy demands official action of the university, and holds it responsible for the purposes of Title IX, rather than the offenders of violence (OCR 2001).

Challenges in Implementing Title IX

Considering the history of Title IX, a few qualities of the law give rise to difficulties in implementation. Importantly, Congress passed Title IX nearly 45 years ago, yet institutions of higher education still do not agree on how to implement it. This stems in part from the changing interpretation of the law over time. Moreover, though, difficulty lies in the structure and particular actors required for implementation. While Congress passed the law, it is not directly responsible for enacting or enforcing it. Enactment is left entirely to higher education institutions, while the Office for Civil Rights has been entrusted with enforcement. However,

OCR is a reactive branch of the government; although it does conduct compliance reviews with universities, it mainly responds to allegations of violations made by individuals associated with a Title IX case at that university. OCR has neither the personnel nor the structure to proactively develop policy for every school in the country, and suggesting one model policy would not guarantee compliance, as every school has unique needs and requirements.⁴

Inherently, a policy that the federal government creates yet relies on third-party actors to implement brings challenges. In this case, institutions of higher education (and other educational institutions, such as K-12 schools) must take the law from its formulation from United States code into an implementable form. This leaves a need for the federal government to ensure that higher education institutions are in compliance with the policy and also to ensure that they are engaged in ongoing enforcement. As noted earlier, the Office for Civil Rights has been instrumental in both of these areas, as it not only provides Dear College Letters and other guidance to higher education institutions, but also may at any time open a compliance review on an institution, and must also respond to any complaints received from affected individuals who allege that a college or university has violated their Title IX rights.

As indicated by its winding history, implementation of Title IX has been a moving target for institutions of higher education. Even upon settling that Title IX extends into the sphere of sexual assault on campus, colleges and universities have struggled to appropriately transform Title IX into a sexual misconduct policy and process. This has been demonstrated both by the inconsistency in policies across universities and the increasing number of institutions under investigation for violating Title IX.

⁴ For example, public universities are bound by state laws, which vary between states. Additionally, an urban, co-ed, 4-year, residential research university will have distinct need from a rural 2-year non-residential community college.

As a law, Title IX is unique in some ways and is much like other regulatory laws in other ways. While the nature of the law is inherently and uniquely sensitive, and the center of centuries-old cultural debates about sex and power imbalance in society, it is formulated much like legislation tackling other societal problems. Regardless of topic, Congress passes laws requiring some sort of action by another entity: a state or local government, a non-governmental organization, or, like here, universities.⁵ The ensuing interplay with the federal government over how exactly to go about implementation depends on the nature of the law and the particular entity charged with implementation. Particularly with Title IX, the unlawful behavior is that of an individual affiliated with the institution—a student, staff, or faculty member—yet the institution is the one held accountable for complying with the law. In this way, Title IX works toward the goal of eliminating a type of behavior by individuals by mandating university action to address the behavior. As OCR has outlined, compliance with Title IX is based on the policies and procedures of the university, rather than the existence of sexual misconduct on campus.

In order to fully understand the flow of implementing Title IX, consider the process in four steps. First, Congress passed Title IX. Second, federal agencies (initially the Department of Health and Human Services, later the Department of Education) provide guidance to institutions of higher education to assist in their adoption and enforcement of sexual misconduct policies. Third, higher education institutions respond to reports of sexual misconduct on their campuses. Over time, new interpretations or guidance from the government, or feedback within the university may lead to revisions to a college or university's sexual misconduct policies and

⁵ While it is acknowledged that public universities are in some ways an extension of the state government, they are here considered along with private universities as mostly independent entities with a distinct relationship to the federal government that is not captured in the relationship with the state government.

procedures, which then are incorporated into how the higher education institution addresses sexual misconduct.

While the relationship between compliant institutions and low levels of sexual misconduct may seem linear, this is only true in the long term. In the short term, a university which clearly outlines, disseminates, and follows fair grievance procedures addressing sexual misconduct may actually experience a rise in reports. Several studies identify the many barriers survivors of sexual violence face in reporting such incidents, including shame, self-blame, embarrassment, not wanting to disclose to friends or family, fear of not being believed, fear of retaliation and/or further victimization by the offender(s), and lack of confidence that reporting would bring about a positive outcome (Fisher et al 2003; Sable et al 2006; Koss et al 1987). To the extent that colleges and universities address these concerns, for example by discouraging victim-blaming,⁶ maintaining confidentiality to the full extent of the law, preventing retaliation and revictimization, and holding fair and equitable response procedures, survivors will feel more comfortable and thus have a higher propensity to report sexual misconduct. Only by reporting at rates closer to actual incidence rates can institutions fully address sexual misconduct on campus and punish or remove perpetrators. In this way, it is in the best interest of the university to fully implement Title IX, acknowledging that the immediate result may well be an increase in reports of sexual misconduct.

A full implementation of Title IX is congruous with a compliant sexual misconduct policy.⁷ Hence, the level of compliance based on federal guidelines is a direct way to measure the extent of policy implementation of Title IX. This is because fundamentally Title IX is a

⁶ Victim blaming refers to the phenomenon by which an individual places the blame on the victim or survivor of a crime rather than the perpetrator, often due to societal gender norms or acceptance of rape myths.

⁷ Full compliance would also entail proper follow-through on all aspects of the policy, as noted in future sections.

regulation on colleges and universities receiving federal funding, despite its indirect influence on student behavior.

Implementation of Title IX, though, has been made difficult in two key ways. The first, as described above, stems from the changing interpretation of the purpose and exact requirements of the law. As this understanding changed, universities have repeatedly adjusted their strategies and campus policies so as to maintain federal compliance. In addition, Title IX is fundamentally aimed at two audiences: it compels policymaking by universities, in a mission aimed at altering the behavior of students on campuses. In this way, it is an indirect process where compliance is measured not by the absence of sexual assaults on campus, but by the ways universities craft and enforce policies outlining the institutional response to sexual misconduct.

Factors Affecting Policy Implementation

The extent of implementation of Title IX may be based on several factors, as described in the policy implementation literature. Trends found in this literature include strong leadership amongst top decision makers, visible supporters of the policy or change at all levels involved, and methods of communication between any relevant groups involved in policymaking (Steelman 2010; Newcombe and Conrad 1981). In particular, implementing Title IX may involve several units of a college or university to coordinate efforts and personnel necessary to engage with the policy, disseminate it and carry it out as well as perform any enforcement needed.

Toddi Steelman (2010) examines the conditions under which policy changes, what she calls “innovations.” Steelman notes three factors are critical for policy innovations to be fully adopted. These include (1) dedicated individuals who support the innovation, (2) structures that are conducive to innovation and allow for clear communication, and (3) strategies to provide effective messaging for the innovation.

Newcombe and Conrad (1981) looked specifically at implementation of innovations in higher education and found four broad factors that determine the rate and scope of implementation: (1) administrative leadership, (2) use of facilitative substructures, (3) conditions in institutional subsystems, and (4) government intervention.

Administrative leadership involves those top actors in an institution, here perhaps the president of the university or the Title IX Coordinator, controlling and encouraging the process of implementation with dedication to the changes required for implementation and the clout to enact meaningful change. Next, substructures that facilitate communication, data collection and maintenance, and personnel updates will further implementation, according to the model. An institutional subsystem refers to all those departments, divisions, and offices that participate in the implementation of a policy. In particular, Newcombe and Conrad posit that there must exist at least one individual dedicated to the change within the subsystem, and that the administration acknowledges the importance of a contribution by the subsystem. Finally, government intervention in the form of a federal mandate and further enforcement efforts (such as visitation to the institution from a federal representative) will contribute to implementation by offering specific requirements and/or threatening punishment, thereby inciting action.

Newcombe and Conrad further assert that there are four stages of implementation of federal mandates in colleges and universities: (1) infusion, (2) preparation and policy formation, (3) trial and transition, and (4) policy execution. Within these stages, they outline how their four factors affect the rate and scope of implementation. Administrative leadership affects the first two stages of infusion and preparation and policy formation, while facilitative substructures affect the final stage of policy execution. Institutional subsystems affect both preparation and

policy formation and trial and transition. Governmental intervention affects trial and transition as well as policy execution.

The first stage commences as soon as the institution introduces the mandate. Newcombe and Conrad explain that the eight steps within this stage could occur simultaneously or intermittently. These eight steps include: presentation of the mandate to the appropriate individuals; inquiry of the reactions of external organizations to the subject of the mandate; consideration of the “social values” of the mandate on behalf of the target audience; discussion amongst university officials; reflection by the audience as to potential effects; interpretation by key officials; articulation and dissemination of the interpretation; feedback from constituents of the university.

After infusion, administrators begin to develop plans in the preparation and policy formulation stage. This stage, too, encompasses several steps: investigative self-study; evaluation of receptivity to change; consideration of potential conflicts and risks; synthesis of the results of the self-study and strategy for use of this information; declaration of intent to comply. This stage also includes selection or creation of “substructures” that facilitate compliance efforts and develop strategies for implementation in the various relevant subsystems within the university. Along with this interpretation is the formulation of policy, at least in the case of Title IX.

Once these policies are in place, the third stage, trial and transition, begins. This stage encompasses “cycles of decision making, conflict, action, reaction, and adjustment” (1981). Newcombe and Conrad note that when this cycle settles into a predictable pattern and a policy implementing the mandate is established, the fourth stage begins.

Although universities tend to change their policies in reaction to new understandings of compliance, as evidenced by their archived policies that demonstrate such changes, this would be

classified as part of stage four. In this stage, policy execution, the cycle of action-reaction still exists, but with more systematic – rather than sporadic - changes. However, once implementation reaches this stage, there is no guarantee that it will not regress back into an earlier stage.

The factors outlined above may have the effect of creating conditions conducive to implementation of Title IX and creating a compliant sexual misconduct policy. One difficulty with this policy area is the sheer number and variety of actors who may be involved in any process. Exclusive of the many diverse actors who enact the policy (Title IX Coordinators and deputies, investigators, hearing panels, appeals panels, etc.), the voices involved in making policy may be equally diverse. The implementation and policymaking process may involve administrators, conduct officials, other student affairs staff, professional advocates, legal counsel, and even students who have been through the system or are activists on campus.

Research Questions

This project will consider seven key research areas. The first three are based on a needs assessment of what is happening with sexual misconduct policies on college campuses. These are

1. How compliant are sexual misconduct policies at institutions of higher education?
2. How confident in and knowledgeable of the policies and processes are students?
3. How available are these policies online?

The next four questions investigate the relationships between these factors. They are as follows:

1. Are more compliant policies correlated with more student confidence?
2. Are more compliant policies correlated with more perceived student knowledge?
3. Is availability of policies online correlated with compliant policies?
4. Is availability of policies online correlated with more student confidence in or perceived knowledge of sexual misconduct policies and processes?

Answering these questions will provide a fuller understanding of the impact of sexual misconduct policy on college campuses. Even a lack of relationship will demonstrate new avenues for research or new areas of literature to consider. These research questions will be answered using three sources of data. Compliance measurements will utilize the *Not Alone* guidelines as compared with the sexual misconduct policies of each individual school. Student confidence in and perceived knowledge of sexual misconduct policies and processes will be discovered through analysis of the Westat Campus Climate Survey results. Finally, the online availability of sexual misconduct policies will be tested by searching many familiar terms in hopes of accessing the policies.

Case Studies

Six case studies were chosen from the 27 schools that conducted the Westat Campus Climate Survey, which included questions on sexual misconduct policies. A random number generator was used to determine which of these 27 schools to incorporate as case studies. The parameters set were only that three be public and three be private schools. The cases included are: Brown University, California Institute of Technology, Ohio State University, University of North Carolina at Chapel Hill, University of Texas at Austin, and Yale University.

These cases range from small to large, Ivy League to flagship state schools, and represent six different states from coast to coast. All but one has nearly equal numbers of male and female students, with CalTech as the exception with two-thirds male students and one-third female (Table 1). CalTech is also the only case study which participates in the NCAA Division III level athletics, while all the others are ranked as Division I. Additionally, CalTech is the only school of the group that does not host Greek life on campus.

While these schools are all different in many respects, they are quite similar in other important ways. Namely, they are all four-year, co-ed, residential colleges and universities. They are all ranked highly by the U.S. News and World Report Education Rankings (usnews.com). By virtue of the data used, they are all members of the AAU. This membership is based on invitation, implying some level of homogeneity. These schools do not represent all institutions of higher education in the nation, and the trends found here may not hold at two-year, single-sex, non-residential universities, or those schools specifically aimed at a particular vocation, from a technical program for automobile mechanics to a music conservatory for classical musicians.

Table 1. Basic Information about Cases Studied

	Ohio State	University of Texas-Austin	Brown	California Institute of Technology	Yale	University of North Carolina
Enrollment	58,000	51,000	9,000	1,000	12,000	29,000
Type of Institution	Public	Public	Private	Private	Private	Public
Male:Female ratio	51:49	49:51	49:51	67:33	51:49	42:58
State	OH	TX	RI	CA	CT	NC

Source: Author compiled from institution websites

Data and Measurement

Measuring Policy Content

Based on the methodology of Streng and Kamimura (2015), compliance levels for Title IX policies can be measured using the guidelines published in the *Not Alone* First Report from the White House Task Force to Protect Students from Sexual Assault. The compliance guidelines within the *Not Alone* Task Force Report are broken down into ten areas that every sexual misconduct policy should cover. These are as follows:

1. Introduction
2. Scope of the policy
3. Options for assistance following an incident of sexual misconduct
4. Title IX coordinator
5. Definitions
6. Reporting policies and protocols
7. Investigation procedures and protocols
8. Grievance/adjudication procedures
9. Prevention and education
10. Training.

Many of these categories include several specific requirements; for example, the grievance/adjudication section includes 19 items. Totaling each of these 10 sections results in 60 individual requirements.⁸

For each case study, the policy was evaluated on the basis of these 60 items, and given a percentage score out of 60. Another score was calculated based on the average of the percentage completed from each category. Additionally, it was noted how many total sections each case fulfilled with its policy. Each policy was obtained online on the website of the college or university. Where two documents clearly acted together as the policy and procedures related to Title IX, both were considered in the evaluation. Only the most recently updated version of the policy was examined.

It is further important to note that the compliance score was based on the exact language included in the guidelines. Where the list demanded “outline” or “clearly define,” only those policy provisions in accordance with the provided verbiage were considered for the purpose of

⁸ Arguably, some of the provisions within the 60 are more or less vital to a functioning and compliant policy. However, no provision was weighted any more than any other, as the outright decision to deem certain items as more necessary is beyond the scope of this work.

the score. This involved some judgement where a policy gave passing mention of a concept, or seemed to imply particular provisions. This method is not the only way to evaluate such policies, but was utilized consistently across all cases. In particular, it may be the case that other documents supplied by the university or advertised either online or on paper may fulfill some of the requirements deemed missing by this analysis of the policy. This may well act as an appropriate substitute in complying with federal policy, but was not included for the purposes of this study.

Measuring Perceptions of Policy Content

In April and May of 2015, 27 institutions of higher education distributed the Association of American Universities Climate Survey on Sexual Assault and Sexual Misconduct. Across the 16 public and 11 private universities, including six of the seven Ivy League schools (Princeton did not participate), more than 150,000 students completed the survey, making it one of the largest surveys on this issue (Cantor 2015). This level of response represents an overall participation rate of 19.3% among all participating schools. This is lower than several other surveys, but takes into account individual response rates across universities, some of which were much higher. Response rates ranges from 7% to 53% (Cantor 2015). All but one participating school (Dartmouth College) is a member of the Association of American Universities. While not the first study to investigate incidence rates and attitudes around sexual misconduct, it is notable for its implementation amongst a large number of colleges and universities (Canter 2015). Developed by Westat, a research firm, on the basis of the instrument designed by the White House Task Force to Protect Students from Sexual Assault, the primary goal of the Climate Survey was “to help participating universities better understand the attitudes and experiences of their students with respect to sexual assault and sexual misconduct” (Cantor 2015).

The Climate Survey instrument included 53 questions asked of every participant, in addition to several follow-up questions included only if the participant indicated a personal experience of sexual violence. The survey is comprised of 10 sections plus a final “debriefing item” gauging the difficulty of answering the survey questions. These sections are as follows:

1. Background (demographic questions)
2. Perceptions of risk
3. Resources
4. Harassment
5. Stalking
6. Intimate partner violence/domestic violence (asked only of those indicating they have been in a partnered relationship since enrolling at the university)
7. Sexual violence screener (personal experiences of sexual violence)
8. Sexual misconduct prevention training
9. Perceptions of responses to reporting
10. Bystander behavior

In order to gauge the awareness and perception of each school’s sexual misconduct policy, this study examined the results of each relevant Campus Climate Survey question. Each survey asked four questions on the knowledge of the survey participant, offering a scale from “not at all knowledgeable” to “extremely knowledgeable.” The questions were as follows:

1. How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?
2. How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?
3. How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?
4. How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?

Additionally, each survey asked five questions asking the participants to indicate the likelihood that campus officials would take certain appropriate actions following a report of sexual misconduct. This measures the students' confidence in the school's response. These questions were answered on the scale of "not at all likely" to "extremely likely" and included the following, after the prompt of "If someone were to report sexual assault or sexual misconduct to an official..." The questions were as follows:

1. How likely is it that campus officials would take the report seriously?
2. How likely is it that campus officials would protect the safety of the person making the report?
3. How likely is it that campus officials would conduct a fair investigation?
4. How likely is it that campus officials would take action against the offender(s)?
5. How likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?

For each college or university considered here, the published results (available online) provided tables of the responses broken down by gender of participant and by undergraduate and graduate/professional students. The total number and percentage of men and women indicating each level of knowledge or likelihood was provided, along with the standard error for each subsection (e.g. female undergraduate, male graduate/professional, etc.).

Measuring Online Access to Policies

In order to gauge the availability of policy information on a university's website, the search terms "sexual assault policy," "sexual misconduct policy," and "Title IX policy" were searched on the university's website search bar. Additionally, the school name was added to this search and it was repeated using the Google search engine (e.g. "Brown University sexual assault policy"). From the initial results page, the first link was tried and several attempts were made from that first result to find the full policy document. If unsuccessful, the next search result was

tried, and repeated until the policy was found. It was noted both how far down the search results list the policy was found, and how many clicks were required from that page to open the full policy document.

Findings

Compliance

Table 2 reports the percentage of each part of the 10 compliance categories fully met by each institution of higher education included in the analysis. Also shown are the compliance percentages, calculated first by averaging compliance in all categories (unweighted) and then overall compliance out of 60 items (weighted). The ten categories included in the compliance scores are as follows:

1. Introduction
2. Scope of the Policy
3. Options for Assistance Following an Incident of Sexual Misconduct
4. Title IX Coordinator
5. Definitions
6. Reporting Policies and Protocols
7. Investigation Procedures and Protocols
8. Grievance/Adjudication Procedures
9. Prevention and Education
10. Training.

Table 2. Compliance of Sexual Misconduct Policies with Title IX Based on Not Alone Report

Category	No. of items	Brown	CalTech	Ohio State	UNC-Chapel Hill	UT Austin	Yale
1	2	100	100	100	100	100	100
2	3	100	100	66.7	100	100	66.7
3	12	66.7	91.7	33.3	100	100	100
4	1	100	100	100	100	100	100
5	13	100	69.2	76.9	100	92.3	76.9
6	9	88.9	100	77.8	100	77.8	77.8
7	8	62.5	87.5	75	87.5	62.5	75
8	19	73.7	78.9	78.9	94.7	47.4	78.9
9	1	100	0	0	100	100	100
10	2	100	50	50	50	100	100
Unweighted	n=10	89	78	66	93	88	88
Weighted	n=60	78	80	63	95	73	82

Source: Author's coding and calculations.

A few trends are clear by examining the particular categories and elements consistently missing from these policies. While no case was entirely compliant, the exact number of items missing from each policy ranged from a low of three (UNC Chapel Hill) to a high of 22 (Ohio State), out of 60. Only two categories were not fulfilled by any case study: Investigation Procedures and Protocols and Grievance/Adjudication Procedures, parts 7 and 8 respectively. In part 7, cases missed between one and three items out of eight total, and in part 8, between one and ten, out of nineteen total.

Campus Climate Surveys

For each case, the responses from the Campus Climate Surveys are displayed in appendix tables 1-6, separated by male and female students as well as by graduate (including professional) and undergraduate students. Also displayed are the number of responses in each demographic category. The responses for “not at all” and “a little” were combined, as were “very” and “extremely,” while “somewhat” was left out. The tables are summarized below for each case.

When considering the results of this survey particularly in terms of knowledge, it is vital to note that this is *perceived* knowledge, as rated by the students themselves. In this way, no guarantee exists that higher reported knowledge equates to actual higher knowledge. While analyzing the accuracy of such perceived knowledge would be helpful to better understand how sexual misconduct policy translates to students, it is outside the scope of this project.

Across the questions at Brown, females are consistently less confident in the university or process. Class status did not have a consistent effect on confidence. For example, graduate students are more confident than undergraduate students of the same gender that campus officials would take a report of sexual assault or misconduct seriously, conduct a fair investigation, take action against the offenders, and address factors that may have led to the assault. However, graduate students are slightly less confident than their undergraduate peers that the officials would protect the safety of the person making the report. Graduate students are consistently less knowledgeable than undergraduate students of the same gender on all items.

At CalTech, females are consistently more confident than males of the same class status on all areas except for confidence that the university would conduct a fair investigation, where male undergraduates are more confident than female undergraduates. Comparing graduates and undergraduates does not immediately show a clear relationship. Both female and male graduate

students indicate higher response percentages than their undergraduate counterparts on likelihood that officials would protect the safety of the reporting individual. Conversely, for likelihood that campus officials would conduct a fair investigation, female undergraduate students are more confident than female graduate students, while male graduate students are more confident than male undergraduate students. Undergraduates, both female and male, are consistently more confident than graduates that campus officials would take action against the offenders.

Undergraduate students of both genders at Cal Tech report higher knowledge on all elements than their graduate counterparts.

At Ohio State, males are consistently more confident in officials and the process than females. The relationship with class status is not as consistent. Female undergraduates and male graduates are more confident than their counterparts that officials would take a report seriously. Male undergraduates are more confident than male graduates that officials would protect the individual making a report, while female graduate students are more confident than their undergraduate counterparts that officials would conduct a fair investigation. Male undergraduates, more so than male graduate students, believe that officials would take action against the offenders and that officials would address the factors that led to the assault.

As far as definitions of sexual assault and sexual misconduct, where to make a report and what happens with a student makes a report, males both undergraduate and graduate are more knowledgeable than their female peers. Male and female undergraduates are evenly knowledgeable about where to get help after a sexual assault.

At the University of North Carolina at Chapel Hill, male students of both classes are more confident their female counterparts that officials would take a report seriously, while graduate students of both genders are more confident in such a response than their undergraduate

counterparts. Indeed, graduate students of both genders were more confident than undergraduate students of their respective genders on all elements except confidence that officials would address factors that may have led to the assault. Males are more confident than females that the university would take action against the offender(s), that the university would conduct a fair investigation, and that officials would protect the safety of the person making the report.

While male and female undergraduates are equally knowledgeable about the definitions of sexual assault and sexual misconduct, they are each more knowledgeable than their graduate peers. Females are more knowledgeable than males about where to get help after an assault, but less knowledgeable about where to make a report or what happens after a report is made.

At the University of Texas at Austin, graduate students are more confident in the officials and processes than undergraduate students and male students are more confident than female students. The reported levels of knowledge are overall similar across both class status and gender.

Male students and graduate students at Yale University are more confident in the processes and officials handling sexual misconduct than their female and undergraduate counterparts. Graduate students and male students are also more knowledgeable on all areas questioned than undergraduate students and female students.

Summary Analysis. Across all of the case studies, a few trends emerge. In terms of confidence, males are more confident in the policies and processes than their female counterparts. At half of the schools, undergraduates are more confident than graduate students, while the opposite is true at the other half. In terms of knowledge, females perceive themselves as more knowledgeable than males, and undergraduates perceive themselves as more knowledgeable than graduate students.

In addition to the individual case studies, the AAU published aggregate data for the 27 schools completing the survey. The results are displayed in the table below, aggregated for all genders and class statuses and compared with the individual results from each case study.

The report acknowledges the great disparity in answers between schools⁹. For example, the range by institution of students who believe it is very or extremely likely that the university will take seriously a report of sexual assault or misconduct is from a low of 46 to a high of 77 percent. The report details that the majority of schools fall between 54 and 69 percent, with five below and five above this range. Between 38 and 57 percent of students believe it is very or extremely likely that the university will conduct a fair investigation, with three schools above and below this range. For every question gauging confidence, the AAU reports that females are less optimistic and indicate lower levels of confidence in the university or process.

Table 3 directly compares the data from all six case studies alongside the average from the AAU report. These data are aggregated across all class statuses and genders. The average of the six cases generally mirrors the average of all 27 schools using the Westat Campus Climate Survey. However, as the AAU report indicated, individual responses from case studies often vary far from that average. The cases are organized by their level of compliance, weighted by considering the compliance on each section of the guidelines (as opposed to the raw percentage out of 60), increasing in compliance.

⁹ Range data is not available for every individual question within the AAU report.

Table 3. Summary Analysis of Student Perceptions of Sexual Misconduct Policy by Institution Schools Organized by Weighted Level of Compliance (Low-High)

	AAU	Six School Average	Ohio St.	UT A	Brown	CalTech	Yale	UNC
Compliance Score:	-	79	63	73	78	80	82	95
If report, officials would:								
<i>% Very likely or extremely likely</i>								
Take report seriously	63	62	64	62	51	78	58	58
Protect safety	57	61	55	54	70	72	52	52
Conduct fair investigation	49	45	50	47	26	59	40	44
Take action on offender	44	42	48	44	25	57	29	36
Address factors	39	37	38	37	31	48	27	33
Student knowledge of campus sexual misconduct policy and procedures								
<i>% very or extremely knowledgeable</i>								
Def. of sexual assault	24	23	22	21	18	22	23	30
Where to get help	30	30	24	22	30	39	38	36
Where to make report	26	24	21	20	20	33	28	28
What happens if report	11	11	9	7	12	13	13	16
Under investigation by OCR?			Yes	No	Yes	No	No	Yes

Source: Author compiled from AAU Campus Climate Survey, 2015

Website Research

Based on both internal searches using the university's search bar and the Google search engine, the policies of each case is accessible from the first or second link using any of the three sets of search terms, with one exception (Ohio State searching "Title IX Policy" on school search bar). For Cal Tech, UNC Chapel Hill, and Yale, policies can be accessed through the first link. For Cal Tech and UNC Chapel Hill, it takes at most two clicks from that first link to access the policy (searching "Title IX Policy" in Yale's school search bar required three clicks from the first link). Every search term on either search method at every school is accessible from the first two links with at most three additional clicks with two exceptions: one link takes four clicks, and one policy is found at the fifth search link. In the latter case, though, several of the first few links claim to link directly to the policy, but clicking results in a 404-Page Not Found error.

Discussion

In consideration of compliance of sexual misconduct policies with federal guidelines and student perceptions of those policies at American colleges and universities, a few conclusions can be made. It is clear from the data presented here that compliance as measured by the checklist provided in the *Not Alone* task force report does not have a clear relationship with student confidence in the process or knowledge of the policy as measured through Campus Climate Surveys. Because this study found comparable accessibility of sexual misconduct policies across all cases, disparities in online access is likely not impactful in student perceptions.

The school with the highest compliance, University of North Carolina at Chapel Hill, had the highest knowledge rate across the cases on the definition of sexual assault and sexual misconduct and what happens when a student reports sexual assault or misconduct. However, students at this school also had the lowest confidence of any case study that officials would protect the safety of the reporting individual. Despite this study's finding of relatively high compliance, the university is currently under investigation with the Office for Civil Rights.

The school with the lowest compliance, Ohio State University, did not have the lowest levels of confidence or knowledge on any of the nine questions. In fact, most of the student perception responses were within two percentage points of the AAU overall average. Ohio State, like UNC Chapel Hill, is currently under OCR investigation.

Brown University students reported the lowest levels of confidence of any case on three out of five questions, and the lowest levels of knowledge on two out of four questions. However, the level of compliance closely resembles that of California Institute of Technology, which had the highest confidence levels amongst these cases on all five questions, and the highest knowledge levels on two out of four questions.

Students at the University of Texas at Austin had the lowest knowledge levels on two of four questions, while the responses to four out of five confidence questions were within two percentage points of the AAU average. Yale University students reported the lowest level of confidence that officials would address factors that led to the sexual assault, while responses to two out of four knowledge questions were within two percentage points of the AAU average. Neither the University of Texas nor Yale are currently under OCR investigation.

The lack of a clear relationship between compliance and student responses could be due to construct validity of the measures of policy implementation or underlying systemic inhibitors. As described, the policy process for Title IX is multistep: Congress passes Title IX, higher education institutions find ways to translate the law and policy guidelines into sexual misconduct policies, reports of sexual assault are received and responded to by the institution, and then students gradually build a perception of the campus' sexual misconduct policy and process. While putting the implementation and perception stages into conversation is important, it also does not encompass activity in the execution phase that may have explanatory effects on the findings here.

In particular, a policy may be well-written and compliant on paper, but if those processes outlined in the policy are not followed or they are not clearly communicated to the student body, student perceptions will suffer. While it is possible that students read the policies and develop ideas from it, it may be that students' perceptions are based on adjudicated reports. In this way, the policy as written may not translate to corresponding perceptions (e.g. highly compliant policies may not result in high student confidence if the intermediary step does not indicate equally high compliance). This study has investigated compliance in a one-dimensional form: to

what extent the written policy contains the elements that it should, as per guidance from the federal government.

Limitations and Future Research

As indicated, this study concerned itself only with the institution's implementation and student perception phases, rather than the intermediary phase of policy execution. This is more difficult to study, as it may change from case to case at one university, and inherently almost certainly will, as each report of sexual violence is different in the details and each individual involved may have different needs. Further, finding information on these details is far more difficult than finding a published policy, due to the privacy concerns of those involved. Still, this would be a useful next area to consider in understanding the relationship between sexual misconduct policy compliance and student perceptions.

More generally, a clear conclusion of this study is that higher education institutions are not currently compliant, even in policies as written. A thorough assessment of the state of compliance of colleges and universities, with as many cases as possible, including non-traditional schools (not simply elite, four-year, residential, co-ed institutions) may provide a better sense of what is missing between federal recommendations and actions taken by university policymakers.

In terms of measuring the compliance of implementation, this study used only one measure (adherence to OCR's published guidelines), while others may exist. The sheer number of items on the checklist used may bias the results toward those policies which are more detailed and include reference to all of the potential resources available, increasing the measured compliance here but not actually reflecting a difference in how the campus responds to sexual assault. Since compliance as measured by this checklist does not directly correspond to whether

a university is currently under investigation for violating Title IX (see Table 3), it follows that OCR may consider different factors than those on the list when investigating a higher education institution. Finally, policies as written may not directly translate into how campus officials act in an investigation or adjudication, actions which would not be captured in a reading of the policy.¹⁰

While it has been demonstrated in the literature that students use websites to find information, other surveys question the impact of this method of information delivery (Potter et al 2015).¹¹ In this way, an easily accessible policy online may not indicate an increased likelihood that students read and engage with the policy. Additionally, access to a policy that students view unfavorably would not have a positive effect on student confidence in the process or necessarily knowledge of how reporting works.

Further, students unfamiliar with the issue of sexual assault or sexual misconduct or even Title IX may use very different keywords in hopes of finding help or information on reporting the crime. This demonstrates that a level of familiarity or base knowledge may be required for easily accessing policy information. In addition, even the most accessible policy requires an action by the student as reader, which may not have happened if the student did not feel it relevant or directly applicable.

A particular concern with the survey data is that the students gauge their own knowledge of the policy and process, with no guarantee of accuracy. A student could indicate a high level of

¹⁰ This may well be a case for schools like UNC Chapel Hill, with compliance but under investigation, although that investigation could also be part of a regular compliance review.

¹¹ In Potter et al, students at seven universities were organized into five groups, with one control group and each of the rest receiving the sexual misconduct policy in different forms. A pre- and post-test measured knowledge of and confidence in the policy and process for reporting sexual misconduct. Results indicate that multiple methods of delivery had a larger impact than just one method, although the most influential method of policy presentation was facilitated discussion. Further, fewer than 30% of the group solely sent a link to the policy even opened the document.

knowledge but be misguided. Further, a danger with perceptions of confidence is that the perception may be based on exceptional anecdotal stories or rumors. These may not accurately represent the experiences of students who have utilized the process, but would skew results to show an unreliable impression of the policy or process.

As with any research, investigating more cases in the future may uncover trends that are not apparent with only a few cases. What is clear from both the six cases presented here and the larger AAU report is the incredible range of responses on the Campus Climate Survey across universities. Further research into the nuanced similarities may demonstrate factors that particularly lead to higher student confidence in or knowledge of the process.

Finally, in order to develop recommendations from this data, it would be useful to consider other fields of similar policies. That is, those areas where Congress has passed regulatory legislation requiring non-governmental actors to implement broad regulations with the dual targets of both fulfilling federal requirements so as not to incur punishment and mitigating dangers or solving the problem addressed in the initial legislation. Such examples include food safety, environmental protection, and workplace safety regulations.

One potential similarity in enforcement may stem from the use of regular inspectors such as is the practice with the Food and Drug Administration, Environmental Protection Agency, and the Occupational Health and Safety Administration. This model allows for more consistent enforcement, with more opportunity for correction. While the technical repercussion for violating Title IX is removal of federal funding, institutions are exempt from this action if they agree to the recourse prescribed by OCR. It is unlikely that OCR would ever actually revoke federal funding for this issue because that would mean fewer resources available to the campus to address sexual misconduct. Still, if the Office for Civil Rights adopted this model, and hired

the necessary personnel, which they currently do not have, the increased oversight may assist institutions in better meeting their requirements. OCR does not currently “inspect” university proceedings at the same rate as these other fields are inspected. Even when compliance reviews do occur, they may take months or more to complete, leaving potentially dozens of mishandled reports in that time frame. This would bridge the gap between federal law and enactment by non-governmental actors, each dealing with their respective institutional pressures and needs.

Appendix 1. Campus Climate Survey Data – Brown University

Association of American Universities Campus Climate Survey; Brown University. 2015.

1. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take the report seriously?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little likely	17.4	23	15.3	15	9.6
Very or Extremely Likely	50.5	38	51.9	58.7	63.2

2. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would protect the safety of the person making the report?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little likely	5.7	5.7	7.5	4.9	4.8
Very or Extremely Likely	70.3	69	62.2	75.4	71.8

3. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would conduct a fair investigation?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little likely	33.6	42.1	26.2	33.6	17.5
Very or Extremely Likely	25.6	15	33.2	27.3	42.1

4. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action against the offender(s)?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little likely	37.7	50.5	37	31.2	19.3
Very or Extremely Likely	24.8	11.9	23.6	31	44.2

5. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little likely	33.2	41.1	34.3	30.3	17.2
Very or Extremely Likely	30.7	21.5	31.5	33.9	47.1

6. *Question: How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little	42.3	38.2	57.5	36.4	53.3
Very or Extremely	18.4	30.1	9.4	22	12.2

7. *Question: How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little	29.8	23.1	43.5	27.3	40.6
Very or Extremely	29.8	35.5	18.6	32.6	14.4

8. *Question: How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little	43.8	42.9	54.9	38.8	48.6
Very or Extremely	20.1	19.5	12.1	24.6	17.7

9. *Question: How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=3087	N=1306	N=483	N=914	N=384
Percent Responding:					
Not at all or A little	59	57.8	68.7	54.2	66
Very or Extremely	11.5	10.8	5.8	15.1	8.9

Appendix 2. Campus Climate Survey Data – California Institute of Technology

Association of American Universities Campus Climate Survey; California Institute of Technology. 2015.

1. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take the report seriously?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little likely	6	6.6	28.8	3.3	5.7
Very or Extremely Likely	77.7	74.4	69	78.8	81.7

2. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would protect the safety of the person making the report?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little likely	7.2	7.4 (0 for not at all)	12.2	5.9	6
Very or Extremely Likely	71.5	63.3	65.6	72.7	75.7

3. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would conduct a fair investigation?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little likely	11	9.5	11.6	13.2	9.9
Very or Extremely Likely	58.7	60.8	54.9	52.5	64

4. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action against the offender(s)?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little likely	10.7	11.4	17.8	6.2	10.8
Very or Extremely Likely	57.2	51.8	44.7	68.1	56

5. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little likely	18.4	18.2	23.3	18.8	16.3
Very or Extremely Likely	47.8	43.3	42.4	55.4	45.8

6. *Question: How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little	41.5	37.3	48.6	36	44.5
Very or Extremely	22.2	26.8	19.8	24	20.1

7. *Question: How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little	23.5	16.8	25.6	18.1	29.5
Very or Extremely	39.2	53.3	34.6	43.7	32

8. *Question: How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little	33.5	27.1	45.9	27.2	35.9
Very or Extremely	32.5	42	28.6	36.1	28.3

9. *Question: How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=983	N=207	N=164	N=309	N=303
Percent Responding:					
Not at all or A little	60.7	50.4	64.7	56.1	66.7
Very or Extremely	13.2	21.3	12.1	15.3	9

Appendix 3. Campus Climate Survey Data – The Ohio State University

Association of American Universities Campus Climate Survey; Ohio State University. 2015.

1. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take the report seriously?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little likely	11.7	13.9	12.7	9.8	9.8
Very or Extremely Likely	63.6	57	58.8	71.1	66.8

2. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would protect the safety of the person making the report?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little likely	14.5	17.1	16.6	11.4	12.1
Very or Extremely Likely	55.3	49.9	49	62.3	55.9

3. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would conduct a fair investigation?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little likely	16	16.8	14.3	16.2	13.9
Very or Extremely Likely	50.1	47.2	49.7	53.1	51.5

4. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action against the offender(s)?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little likely	17.6	22.2	21.5	11.5	14.7
Very or Extremely Likely	48.4	40.1	38.7	58.6	50.9

5. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little likely	25.4	27.8	26.7	22.1	25.7
Very or Extremely Likely	38.2	35.1	34	42.7	38.3

6. *Question: How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little	46.9	46	58.8	42.2	54.6
Very or Extremely	21.9	23.2	13	24.5	16.5

7. *Question: How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little	44.4	42.4	49.8	42.7	52.4
Very or Extremely	24	25.5	19.4	25.9	15.6

8. *Question: How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little	52.2	55.5	55.9	47.9	53.2
Very or Extremely	20.5	17.9	16	25.1	17.1

9. *Question: How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=11072	N=5158	N=1679	N=3221	N=1014
Percent Responding:					
Not at all or A little	71.3	72.8	77	67.7	73.8
Very or Extremely	9.1	8.5	6.1	10.7	7.9

Appendix 4. Campus Climate Survey Data – University of North Carolina at Chapel Hill

Association of American Universities Campus Climate Survey; University of North Carolina at Chapel Hill. 2015.

1. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take the report seriously?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little likely	12.8	17.4	15	8.2	7
Very or Extremely Likely	57.8	48.7	53.5	66.1	70.3

2. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would protect the safety of the person making the report?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little likely	16	20.3	20.5	10	10.2
Very or Extremely Likely	51.6	42.8	45	62	63.3

3. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would conduct a fair investigation?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little likely	17.3	21	17.7	15.1	11.2
Very or Extremely Likely	44.1	37.9	41	49.3	53.8

4. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action against the offender(s)?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little likely	24	31	28.9	16.1	14.2
Very or Extremely Likely	35.8	26.1	27.9	45.1	52

5. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little likely	29.8	34.4	35.9	22.5	22.9
Very or Extremely Likely	33.3	29	27.1	37.9	15.8

6. *Question: How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little	32.3	32.5	38.5	26.2	36
Very or Extremely	30.4	32.3	25.8	32.9	26.8

7. *Question: How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little	25.9	22.4	30.9	24.6	31.4
Very or Extremely	35.5	39.4	30.9	37.3	27.8

8. *Question: How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little	36.5	38	42.5	32.1	34.4
Very or Extremely	28.3	27	23.4	33	28.8

9. *Question: How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=5148	N=2196	N=1255	N=966	N=731
Percent Responding:					
Not at all or A little	52	53	57.3	46.1	53.2
Very or Extremely	15.5	15.2	11.1	19.2	14.8

Appendix 5. Campus Climate Survey Data – University of Texas at Austin

Association of American Universities Campus Climate Survey; University of Texas at Austin. 2015.

1. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take the report seriously?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little likely	11.4	12.5	16.4	8.5	5.8
Very or Extremely Likely	61.9	56.9	50.5	69.1	67.7

2. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would protect the safety of the person making the report?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little likely	14.6	16.9	20.4	10.6	11.1
Very or Extremely Likely	54.2	49.9	44.1	60.5	60.6

3. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would conduct a fair investigation?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little likely	15.3	16.4	18.3	13.7	12.3
Very or Extremely Likely	47.4	44.3	40.4	52	52.1

4. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action against the offender(s)?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little likely	18.9	22.5	28.6	11.2	16.4
Very or Extremely Likely	43.9	37.2	29.1	54.4	48.6

5. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little likely	24.1	25.7	33.5	19	23.1
Very or Extremely Likely	37	34.8	28.7	42.2	37.2

6. *Question: How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little	46.1	48.5	54.5	41.2	46
Very or Extremely	21.3	20.3	19.5	23.2	19.7

7. *Question: How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little	43.2	44.1	45	40.5	47.9
Very or Extremely	22.1	23.4	23.2	22	17

8. *Question: How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little	48.7	52.5	51.9	43.9	48.6
Very or Extremely	20.3	18.3	18.8	22.8	19.7

9. *Question: How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6541	N=2927	N=981	N=1841	N=792
Percent Responding:					
Not at all or A little likely	72.1	75.7	73.5	68.2	72
Very or Extremely Likely	7.4	6.8	6.7	8.1	7.7

Appendix 6. Campus Climate Survey Data - Yale University

Association of American Universities Campus Climate Survey; Yale University. 2015.

1. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take the report seriously?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little likely	13.1	16.7	16.3	8.2	11.2
Very or Extremely Likely	57.6	46.6	50.9	65.4	66.1

2. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would protect the safety of the person making the report?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little likely	15.4	20.6	19.9	9.3	11.8
Very or Extremely Likely	52.2	44.6	43.2	62.7	58.8

3. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would conduct a fair investigation?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little likely	18.6	21.7	19.8	18.9	14.8
Very or Extremely Likely	39.7	32.8	36.4	42.6	46.2

4. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action against the offender(s)?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little likely	30.5	44	33.9	24.2	21.5
Very or Extremely Likely	29.4	16.4	22.4	37.1	40.1

5. *Question: If someone were to report sexual assault or sexual misconduct to an official, how likely is it that campus officials would take action to address factors that may have led to the sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little likely	35.9	44.5	38.3	30.9	30.4
Very or Extremely Likely	26.6	19.1	23.8	30.7	31.9

6. *Question: How knowledgeable are you about how sexual assault and sexual misconduct are defined at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little	38.5	35.8	47.9	29.5	39.5
Very or Extremely	22.7	24.5	16.6	30.8	20.4

7. *Question: How knowledgeable are you about where to get help at your university if you or a friend experienced sexual assault or sexual misconduct?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little	25.2	19.1	31.8	16.1	31.4
Very or Extremely	38.2	45.2	30.7	48.4	31.4

8. *Question: How knowledgeable are you about where to make a report of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little	36.4	38.6	40.6	29.3	36.5
Very or Extremely	28.3	27	23.2	35	28.3

9. *Question: How knowledgeable are you about what happens when a student reports an incident of sexual assault or sexual misconduct at your university?*

	Total	Female Undergrad	Female Grad	Male Undergrad	Male Grad
	N=6452	N=1702	N=1805	N=1416	N=1529
Percent Responding:					
Not at all or A little	57.4	56.4	64.9	48.4	58.6
Very or Extremely	13.1	15.3	8.7	18.1	11.2

Appendix 7. Website Data

Results of Online Search for Sexual Misconduct Policies; 2016.

	Google:	School + sexual assault + policy	School + sexual misconduct + policy	School + Title IX + policy			
	School Website:				Sexual assault + policy	Sexual misconduct + policy	Title IX + policy
		Link #; # of clicks	Link #; # of clicks	Link #; # of clicks	Link #; # of clicks	Link #; # of clicks	Link #; # of clicks
Brown		2;3	2;3	1;1	2;1	2;3	1;2
Cal Tech		1;1	1;1	1;2	1;1	1;1	1;2
Ohio State		1;2	1;2	2;2	1;2	1;2	5;3
UNC-Chapel Hill		1;2	1;2	1;2	1;2	1;2	1;1
UT Austin		1;2	1;1	2;4	1;2	1;1	2;2
Yale		1;2	1;2	1;2	1;2	1;2	1;3

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