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**Unsustainable and Unsupported: Connecting "Islands" of Federal Title IX Guidance, Campus Adjudication, and the Need for Holistic Care and Hope in an Era of Rape Culture**

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# Unsustainable and Unsupported:

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Connecting "Islands" of Federal Title IX Guidance, Campus Adjudication,  
and the Need for Holistic Care and Hope in an Era of Rape Culture

By

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An Honors Thesis Submitted in Partial Fulfillment of the Requirements for  
Graduation from the Western Oregon University Honors Program

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## Abstract

Sexual assault is extremely prevalent on college campuses, with an estimated 25% of college women reporting that they have experienced some form of sexual assault (Beaver, 2017). With federal and state policies written around trying to support adjudication regarding sexual assault, independent task forces created, and entire university departments dedicated towards helping assault survivors, it seems that this problem should be alleviated. Critics argue that university departments are biased and not doing their job in order to protect schools, or that policies are written in order to erase so many experiences from receiving help. Academia looks into the psychological effects of trauma on post-secondary students and analyses endless sets of data in order to find trends related to various policies, yet the same problem seems to keep creeping up.

As of yet, there hasn't been a comprehensive look at how these policies and their affected college departments are connected. This thesis dives into the world of Title IX and sexual assault policy from the lense of sexual assault resource and Title IX staff members on Oregon Public University campuses. Through researching federal and state policies and the guidance that the Oregon Sexual Assault Task Force provides to Title IX and sexual assault resource departments on university campuses, I was able to perform interviews with various staff members about how they are able to implement policies. Through latent thematic analysis of these interviews, I found that Title IX and sexual assault resource departments are severely unsupported and working in a way that is unsustainable. My conclusions lead me to suggest that it is unethical to create policies that focus on trauma without using holistic verbiage and providing necessary and adequate resources.

## Introduction

Me Too. I, like many others, have scrolled through the endless posts, pictures, and hashtags of this social movement with hope and comradery as I finally felt a sense of community and pride.

Me Too. I, like many others, have used this platform as a way to expand my knowledge and vocabulary surrounding sexual assault cases.

Me Too. I, like many others, feel frustrated with the way that people seem to handle sexual assault cases if and when they are reported.

Three years ago, when I first got the idea for my undergraduate thesis, I did it with tears in my eyes with trees trailing behind me as I drove to a location that I can't remember now - the destination never mattered anyway. I was filled with anger and, resentment; I was broken. What a way to stick it to the man, I thought, what a way to show them what they did to me and how they were wrong. My initial research and proposals were done with spite: spite that I was told I wasn't done at the end of the term, spite at the research I was finding that consistently proved my point, spite that these systems weren't working.

Here I am, at what seems to be the destination unknown of my journey. How can I establish something, that is ultimately, the end of a 4-year long process of trauma, grief, healing, and learning? How can I begin the end of what was started without my consent, how can I create an end when I didn't want the beginning? This project has been more than a survivor navigating the back end of university policy structures; it has been the creation of hope, learning, and burning. When I think about this project, I think of one quote I got in

my interviews, “People speak out because they believe that this can change. Because they have hope it can get better for others.” This project has restored that hope for me.

It seems silly to be angry now. These systems aren’t working. I know that to be true, through my academic and independent research. But the reasons they are not working that I know now through this research do not match the reasons I originally, spitefully imagined. These systems aren’t made with animosity towards survivors. They are made with the best intentions, with a horrible lack of knowledge, and with an unsustainable vision and workload. They are made with the thought process that sexual assault is a hiccup in the human condition - but it’s not. Sexual assault is woven into the very fabric of our culture. Sexual assault affects an estimated of 25% of college women (Beaver, 2017; Ellman-Golan, 2017), and its effects are seen almost daily on college campuses through different employee training presentations, new student orientation keynote speakers, and seemingly endless half-hearted posters encouraging students to report their stories.

The systems we create to combat sexual assault and heal those that it hurts cannot be made as a Band-Aid for a temporary wound. They must be made alongside the very structures that hold up our society and ready to last just as long as sexual assault will last in the mind of the survivor. Currently, they are not and do not. That is why they are failing: sexual assault policies put a quick fix on something that is anything but.

A great deal of emphasis on these systems centers around whether college students have an obligation to adjudicate sexual assault cases. So what exactly are students needing to report and what happens to these reports after the fact? As it turns out, the plethora of ways colleges handle these reports stems from the variety of ways campuses around the country

interpret guidance from federal and state governments. Different presidential administrations have released guides such as Title IX, the Dear Colleague letter, and DeVos's amendments, effective in August 2020, in attempt to alleviate and define the complexity of sexual assault cases, yet we still seem to be seeing the same story over and over again. In this thesis, I will be looking at these administrative policies and analyzing how they have affected college campuses, specifically in Oregon. Oregon is a unique state because unlike others, it has a state agency, the Oregon Sexual Assault Task Force (OSATF), that provides training, resources, and support to organizations across the state, including college campuses. The Oregon Sexual Assault Task force provides an additional form of support to the state which is extremely beneficial, yet there still seems to be a disconnect between written policy and the actions these policies inform. My main goal with this research is to look into the question of why these Title IX policies do not seem to be working.

While the apprehension of Title IX policy seems to span the political divide, the reasons for suggesting why the system is broken take vastly different approaches. Those on the left argue that survivors are not believed, and those on the right believe perpetrators are not being heard. While we hear a great deal about this tension, we heard very little about the policies and procedures that lead to the actions universities have taken, and we hear even less about the resources (or lack thereof) provided to campuses that help them create these policies and processes.

In academia, there is quite a bit of research regarding how rape culture establishes itself within every campus and on best practices for working with sexual assault survivors. This research tells us what language to use, how to prevent sexual assault before it happens, and ways in which we can reform the education system to create a larger vocabulary around

consent and assault, thus increasing the prevalence of healthy relationships in later life. National policies suggest that, at least on paper, the government hopes to alleviate sexual assault and that it recognizes that assault is much more likely to happen when within the confines of a university campus. Both the campus-wide and national policy aspects of this research are important, but there is an alarming lack of research connecting these two. How do national policies affect campuses across the nation? How do campus policies become fodder for national politicking? Do they complement each other, allowing each to reach the ideal world they hope to create? Do they work with each other and create a system that simply works for now? Do they create tension - a dynamic in which neither campus adjudication nor policy can thrive? My goal for this thesis was to find answers to these questions, to find the disconnect that is broadly found between policy and college-level implementation. As you will see, my research found that it's not necessarily the policies that are broken, it's the lack of care around these issues. It's the lack of resources given with policies, the lack of campus-wide communication, the lack of support to overworked departments, that is creating an unsustainable system producing these results.

Still, policies never exist in a vacuum. In order to understand their full implication, it is important to look through different levels of government decisions in order to understand what influenced policy creation and what is continuously influencing their implementation. Sexual assault policies on college campuses exist in many different environments, some that interact and some that vehemently do not. It is also important to look at cultural and societal environments in which policies do exist. For example, while the MeToo movement began in 2007 by activist Tarana Burke, it went viral in 2017 from a tweet responding to the Harvey Weinstein arrest which asked women to share their experience with the hashtag #MeToo.



This movement has created somewhat of a cultural phenomenon which “revealed the ways in which the law can be misused to enable and conceal harassment” (Tippett, 2018).

To bridge these islands, I first created a brief policy history of the past three Presidential Administrations (Bush, Obama, and Trump), looking specifically at their work regarding sexual assault and Title IX. This thesis will be looking specifically at these three Presidencies because during this time, America came into its cultural consciousness of the vastness of rape culture in society. I then dive into my original interview research looking at how these policies are implemented “on the ground” in colleges and universities in Oregon to assess strengths and weaknesses they see as they attempt to implement national guidance. I conclude by bringing these two bodies of research in conversation, making recommendations for how we can better serve people on all sides of this complex issue.

## **Title IX Policies and Guidance**

An average of one in five women has been a victim of sexual assault; when on college campuses, this number increases to up to 25% of women (Beaver, 2017; Ellman-Golan, 2017). This issue regularly impacts the campus lives of students, faculty, and staff. Many students check campus sexual assault rates as part of their college searches, and incoming students are given various presentations about sexual assault throughout their college career. On college campuses employees are mandatory reporters, and school administrators search out grants or partnerships with organizations looking to prevent and decrease instances of sexual assault. The prevalence of sexual assault isn’t found just on our college campuses though; in the fall of 2018, the nation watched anxiously as Christine Blasey Ford testified against Brett Kavanaugh for his alleged sexual assault against her in high school, hoping to help prevent him filling a Supreme Court Justice position. Chanel

Millers' testimony against Brock Turner, Anita Hill against Clarence Thomas, over 100 women against Harvey Weinstein, the USA Gymnastics team against their doctor Larry Nassar: sexual assault trials frequently receive heavy media coverage and scrutiny, and then they fade away until the inevitable next case.

The prevalence of this issue is not new and has consistently spanned multiple societal spheres. Attempts to combat the rampant sexism this violence shows in schools and our culture have been proposed in all levels of government. The most impactful of these has been the Educational Amendments of 1972, passed by Congress and signed into law by then-president Richard Nixon. This provided a comprehensive federal law which prohibited discrimination on the basis of sex in activities and education programs in all federally funded schools. Title IX protected all students, employees, applicants, and other persons from all forms of sexual discrimination including discrimination based off of gender identity (*Title IX, Education Amendments of 1972, 1972*).

Title IX is often coined as the beginning of a political consciousness regarding sexual assault and its long-term impacts to survivors. Holistically, this law protects people from sex based discrimination that inhibit their ability to participate in educational programs or activities that are funded through Federal financial assistance (Office of Civil Rights, 2018). Its language and jurisdiction are grounded in equal treatment theory, or equity feminism, which tends to note procedural equality for males and females throughout Title IX jurisdiction (Kaufer Busch, 2018). This policy is broadly implemented through funding in sports, but the scope of this thesis will focus exclusively on how it applies to sex-based discrimination, especially regarding sexual assault. Since its passing, Title IX has created much contention as to if the verbiage of 'sex discrimination' gives federally funded institutions jurisdiction of adjudicating campus sexual assault (Kaufer Busch, 2018). While

Title IX is an expansive policy, this thesis will focus only on the sections with a scope affecting sexual assault on college campuses, with the main one being written as follows:

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance” (*Title IX, Education Amendments of 1972, 1972*).

In 2011, the Obama Administration released guidance regarding Title IX and reaffirming the need for federally funded institutions to address sexual assaults as matters of civil rights under Title IX (US Department of Education, 2011). They believed that the way Title IX was being implemented at the time constituted a violation of the 1972 statute (Ellman-Golan, 2017). To address this, the Administration released what is now called the Dear Colleague Letter to provide federally funded institutions with more guidance. This letter states that the definitions and guidelines given are “...the standard for administrative enforcement of Title IX,” meaning that the standards outlined throughout this Dear Colleague Letter would now be the highwater mark for what federally funded institutions needed to do in order to receive funding (US Department of Education, 2011). Additionally, the Administration clarified that according to Title IX, the sexual harassment or sexual violence of students interferes with their right to receive a discriminatory-free education; making sexual violence a crime (US Department of Education, 2011).

While the Dear Colleague Letter provided direction for institutions, it also reaffirmed the importance of dealing with sexual assault before, during, and after the instance in order to improve educational equity in accordance with Title IX. Additionally, the letter clarified obligations to respond to sexual harassment and violence, requirements for procedural

implementation, and the importance of Title IX Coordinators. This piece of legislation has been paramount in starting the discussion of how sexual harassment and assault interferes with a student's right to receive an education free from discrimination. It also lays out the specific Title IX requirements which are applicable to sexual harassment. The Dear Colleague Letter can also be considered one of the first times in which the prevalence of sexual assault in a federal policy. This letter also supplements OCR's Revised Sexual Harassment Guidance issued in 2001 (Office of Civil Rights, 2018). The Dear Colleague Letter also begins the conversation about expectations around college policies and procedures regarding campus sexual harassment and assault. It creates the outlines of many contemporary college policies, including but not limited to training for employees on campus, how a law enforcement investigation does not exempt from an on-campus investigation, and how to proceed if the complainant asks not to have the school respond to the complaint.

As of November 2018, President Donald Trump's appointee for Secretary of Education, Betsy DeVos, has proposed a rule which would redefine sexual assault and allow more protection for those who are accused. This rule was posted on the Federal Register in November 2019, and officially released in March 2020 with effects beginning August of the same year (Flaherty, 2018; US Department of Education, 2020). When put on the federal register in late 2019, the rule proposed to release schools of all liability for assaults that happened off campus. This received a lot of negative feedback, so it has since been changed to giving the school responsibility over sexual assault which occurred off-campus in places or events that the University was involved with (Smith, 2020).

Self-described as making historic changes to Title IX, DeVos' main goals in this new ruling is to increase protection for the accused by "mandating live hearings by adjudicators

who are neither the Title IX coordinator nor the investigator, and real-time cross examination of each student by the other student's lawyer or representative,” and allows institutions to increase their evidentiary standard to clear and convincing rather than just a preponderance of the evidence (Smith, 2020). This new rule also narrows the definition of sexual assault on college campuses, which many are arguing will inhibit many survivors from actually coming forward to report a sexual assault on a college campus (Grayer & Veronica Stracqualursi, 2020). This is a large switch in the past few Administrative stances on campus sexual assault, and the effects of this have not yet been seen, and are likely not to be fully felt until after the publishing of this thesis.

While the federal government has created base policies for how they believe sexual assault on college campuses should be dealt with, states have also exercised their power to further define and create policy around Title IX issues as they feel necessary. Generally speaking, federal law creates a baseline set of standards that all states must meet while allowing for states to exceed those standards based on their particular culture. Oregon in particular has been generally affirming and exceeding federal guidelines regarding sexual assault. For example, Oregon House Bill 2972 forbids a university from using the threat or action of discipline or sanctions in order to attempt to influence a survivor's decision of whether to report (Osborn, 2017). Additionally, Senate Bill 759 is a plain language law for written protocol for who to respond to assault, and is tailored towards accessibility for survivors who want to report (Moore, 2015).

Oregon also took the additional step of creating the Oregon Sexual Assault Task Force. Started in 1999 by Attorney General Hardy Myers, this organization's goal is to address sexual assault in various forms through educational programs, legislation, and interdisciplinary Task Force Advisory Committees. The mission of this organization is to

“facilitate and support a collaborative, survivor-centered approach to the prevention of and response to sexual violence” (SATF Oregon, 2019). As some of their staff members explain, the main goal of OSATF is to support folks within the community that work on responding and preventing sexual violence. They achieve this through consistent and comprehensive trainings which often include disciplines spanning from law enforcement to child abuse centers. These trainings are grounded in oppression being the root cause of violence, and showing that violence is a choice and affects every fiber of a community.

As is the case with Title IX legislation, federal policy can be interpreted in vastly different ways across states, who can create supporting policies which then go down to universities to interpret and ultimately, implement. Each university’s campus culture and political ideology makes campus-wide policies and their implementation vastly different from one another and therefore also produces vastly different results. Although Oregon allows campuses to create their own adjudication policies, my research shows a number of similarities in the structure of providing sexual assault support, resources, and adjudication to students.

### **Entering the Conversation**

While policy creates a historical and bureaucratic history for sexual assault, it is important to look into academia in order to gain more context regarding the constituency in which these policies are enacted. Along with research regarding trauma and assault, there has been extensive research which focuses particularly on sexual assault on college campuses and the following, but albeit optional, adjudication process.

## The Importance of Victim-Centered Policies to Mitigate Secondary Trauma

Current research on adjudication in this subject show that negative experiences with reporting and trial processes of survivors on college campuses can often lead to secondary trauma, which is when those who have experienced trauma and are still suffering from its impact have heightened vulnerabilities to stressful events that happen to them after the fact (Kammerer & Mazelis, 2006). When campuses implement victim centered policies by allowing survivors to initiate and participate in an investigation via providing enough information for informed consent and a voice throughout the process, they can mitigate retraumatization (Behre, 2017). One way campuses can do this is through listening to the needs and wants of a survivor including why they are reporting, which is often so they can receive validation of their story rather than the traditional version of justice that is found with the criminal justice system (Behre, 2017). Research that supports the need for victim-based policies also creates a very important question for this field: how will campuses provide victim-based policies which are equitably created and implemented when there is often no evidence for this crime?

When looking specifically into counseling services for reporting survivors, one study suggests to use counseling models creating with a basis of feminist theory, which utilizes trauma treatment goals and emphasizes the need to make each client's experience unique to their needs and wants. These three trauma treatment goals include: establishing and maintaining safety, encouraging client empowerment, helping the client find their voice throughout the healing process (Conley & Griffith, 2016). Research has shown that the use of feminist therapeutic approaches reduces depression and anxiety in clients while promoting their sense of control and identity. When working with trauma patients, it is extremely important to foster a sense of control through creating an open dialogue and

allowing the patient to make decisions about their reporting process or lack thereof using informed consent. This form of counseling is incredibly noteworthy as it allows for modified interventions for each case to meet client-specific goals and ultimately increase empowerment in a system where that is almost certainly lacking.

### The effects of working with Survivors

While retraumatization is prevalent to survivors and their journey, it is important to remember that in order to provide true and holistic support to survivors, staff members need to stay aware of the possibility that they may also experience retraumatization or compassion fatigue when consistently being subject to traumatic experiences and shocking images. First defined in 1983 as the emotional distress experienced when working in close contact with a trauma survivor, compassion fatigue presents itself nearly identically to PTSD (Jenkins & Baird, 2002). Working in close contact with survivors can also lead to burnout, which is shown through defensive responses producing psychological strain and can be compounded with inadequate support (Jenkins & Baird, 2002). Studies show that as many as 55 percent of social workers experience one or more symptoms of PTSD due to compassion fatigue and burnout (Choi, 2017). While burnout has been studied much more extensively than compassion fatigue, there has been consistent and notable overlap between both the input and outputs of these conditions. Experiencing compassion fatigue and burnout can create lower job satisfaction and occupational commitment which can not only increase turnover in these types of positions but only fosters a working environment of unsustainability.



## Methods

When beginning my thesis, my original methods were to get a holistic understanding of Oregon sexual assault policies, how they mirror or deter from federal policy, and how the Oregon Sexual Assault Task Force influences these policies and supports implementation on a college campus level. After researching levels of policies, the organizational structure of OSTAF, and academic research regarding sexual assault on college campuses, I felt ready to interview OSATF to get a better understanding of what it was like working with college campuses in the state of Oregon first-hand. My expectation was to learn that OSATF consistently provides support and resources to college campuses to only have them respond with half-hearted implementation and lackluster policy structures. My initial goal with my independent research was to analyze university policies and their success based on if they are victim-centered, which was chosen as a highwater point through my research. When looking at trials, survivors have reported negative experiences with the college adjudicatory system, which can be a form of secondary trauma (Behre, 2017), and using victim-centered policies as a basis of success due to the lack of secondary trauma that survivors will endure when going through the reporting and trial process under revised policies seemed like the best method to reach towards.

The original intent of my thesis was to be able to analyze the accuracy of victim-centered policies as well as the groundwork structure of sexual assault resource and adjudication departments across Oregon public universities. I would then integrate this research with other scholarly work to suggest ways in which policy makers and policy performers can not only improve their work, but improve the context in which sexual assault policies are created and interpreted within the state of Oregon. I wrote my interview questions for OSATF around this original intent, in hopes of utilizing a rather instrumental

and unique task force within Oregon but not realizing that a simple interview would drastically change not only the course of research and methods for my thesis, but my original mindset and ideology around sexual assault policies on Oregon college campuses.

While the Oregon Sexual Assault Task Force has a holistic focus on the state of Oregon and sexual assault, I was focused on how they supported campuses. I was curious to see if an independent task force which works both inside and outside university cultures saw their implementation differently, or if they somehow had the magic answer to sexual assault that universities just weren't listening to. Through reaching out to staff at the Oregon Sexual Assault Task Force that work mainly with universities, I was able to set up an interview with two staff members. (The full list of interview questions can be found in Appendix A). My original goal was to understand the policy reasoning behind why the task force was created, what they do to support universities specifically, and how they impact university policy creation and implementation. Not only would interviewing them give me insight to their particular scope, it would allow me to get a better footing on what Oregon universities currently struggle with regarding Title IX policy and support.

After setting up a meeting with some OSATF staff members and interviewing them, my entire perspective on my thesis changed. I walked into a small office smelling of coffee and covered wall to wall with sentimental pictures, artworks, and inspirational quotes expecting my pessimistic outlook to be matched for the next foreseeable hour and a half. I quickly realized that the OSATF staff members I was talking to did not have that mindset. With analogies of federal policies being basement floors that their organization strives to build upon, stories of hard college administrators coloring my interview, and sentiments of violence being a choice that can be prevented I started to change my outlook and therefore the methods and goal of my thesis.

The staff members of OSATF consistently mentioned that they see how much a lack of staffing and funding hurts institutions. They also mentioned that they wished that these departments weren't the only ones getting trainings from OSATF or even sexual assault or gender-based violence training on campus, to help support the work of this department on a holistic level on campus. When I asked the staff members in a perfect world, what policies or implementations they would change their only response was to include more staffing or create an adequate budget for these departments to work with, as well as to improve training across campus. This was also their response when I asked them what about their organization they would like to change - they felt that more resources were imperative to working towards preventing this violence.

These consistent answers from OSATF completely changed my perspective of policy implementation on college campuses. I initially felt that these systems were lackluster due to departments not following academic research regarding trauma-informed responses, secondary trauma, and making accessible language in policies surrounding sexual assault. With my changed mindset, I realized that this was not because the state and universities were hiring people that didn't care about the profound impact the negative impacts of gender-based violence can have on all aspects of student life and universities. These staff members simply didn't have the bandwidth to truly look at the way their departments and systems are working or create structures that can combat violence prevention while providing holistic, trauma-informed care to a university of thousands or tens of thousands. My new goal was to see how these departments felt on the ground, so I decided to reach out to all Oregon Public Universities sexual assault resource and Title IX departments in order to get more perspective what they are feeling.

I was able to construct interview goals and questions for Oregon public universities to see how these policies are felt on those who are tasked foremost with implementation. Each Oregon Public University was researched to find what staff worked with survivors of sexual assault, on both the adjudication side and the resources/support side. I reached out to each staff member individually and asked to interview them regarding their job. After having informed consent forms signed and setting up a phone interview, I was able to ask the responding employees the following questions, which can be found in Appendix B:

The goal of my interviews was to get information regarding if the balance of work responsibilities and support or resources was sustainable. I reached out to 29 professional staff working on various aspects of campus Title IX cases and sexual assault resource centers throughout the state of Oregon, and I received responses from and interviewed 11 of them.

I felt that using a latent thematic analysis would be most valuable to present the research I found through these interviews with OSATF and 11 Oregon Public University staff members. When looking at a large amount of qualitative data, a thematic analysis can be extraordinarily beneficial to organize, describe, and analyze themes which are consistently found within a data set. The ability to organize a data set through a latent thematic analysis allows for my data to have rich, descriptive, and intuitive conclusions. With the hours of interviews I gathered from professionals all around the state of Oregon, I was able to collect many anecdotes, explanation of systems, and suggestions for change that were incredibly valuable additions to my previous academic research. When analyzing all of these interviews, I was able to find consistent patterns in responses that informed what themes I would create, continue to research, and create suggestions from. My themes included the unsustainability of these departments both in structure and in resources, the focus on holistic

and trauma informed care that these departments have, and how they feel starkly unsupported in their mission on campus.

## **Common Themes**

### Unsustainability Within Title IX Conduct and Prevention Programs

A main issue that is felt on the ground of prevention and conduct work is a lack of funding in these departments. While many higher education departments feel their belt tightening, a tightened belt can often mean a lack of resources for survivors when they need it, a lack of holistic care, and burnout issues that can cause problems with ethical decision-making.

When I asked the Oregon Sexual Assault Task Force what policies and implementations they would like to see on college campuses in a perfect world, all answers boiled down to providing more funding for these departments. Sentiments constantly pointed out the lack of funding alongside these campus mandates. These unfunded mandates are felt in multiple ways on the ground, as every single institutional staff member I talked with mentioned that they felt the program they were working in was unsustainable as it is currently structured and funded. These sentiments boiled down to three main seen issues: lack of full-time employees, too many staff members working with Title IX having multiple positions, and the very real threat and experience of burnout for these employees.

### *Need more Full-Time Employees*

All public institutions are mandated to have people working on Title IX but unfortunately, this mandate is usually unfunded (Wies, 2015). This means that institutions, regardless of student size, are not required to have a specific number of full-time employees working on Title IX issues. This is unsettling for both the students and the staff. As one respondent I spoke to said, “The higher your caseload the less present you can be with survivors.” Both the students needing this resource and the staff can feel pressure and lack of presence when there are not enough full-time employees available to work on Title IX. The Oregon Sexual Assault Task Force mentioned that having more available full-time staff would enable students to “have access to an advocate at all times,” which can greatly improve the student perspective on Title IX resources. OSATF recommended a set number of full-time employees working on Title IX based on the number of students enrolled.

### *Burnout is a Prominent Issue*

The lack of full-time employees not only creates a lack of presence with survivors needing Title IX resources, but it creates an underlying threat of burnout to all employees working under Title IX. Every single interview I conducted included worry about the future employees in institutional Title IX roles as “[they] wonder if [the new employee] is going to be able to do all of the things at once.” It is no surprise to see someone working on a myriad of goals when they are focusing on Title IX; prevention, cases, investigating, referrals, and crisis counseling are just a portion of what many of these job contracts entail. One institution I talked to had a ratio of over 500:1 students to Title IX and preventionist staff. And these employees feel that strain. As the Oregon Sexual Assault Task Force said, having ratios such as this create a culture where one “person [is] responsible for stopping violence,”

and when you are looking at violence holistically this is completely unsustainable.

Burnout is so real in these departments that it was brought up in a joking manner in many of my interviews. When I mentioned burnout, I often got chuckles of exasperation as these employees are, if not currently feeling it, feeling it looming. One institution I talked to mentioned that this conversation began with their coworkers from the first day on their contract, saying that “burnout is a very real thing.” These employees also wished that they were able to take better care of themselves as a way to combat burnout, such as taking workdays that are less than the traditional eight or nine-hour work day or having more flexible hours throughout the week.

*Too many people are “wearing multiple hats”*

Because public intuitions working with Title IX is an unfunded mandate, this often makes working with Title IX an appointment in addition to another role on campus rather than its own position. My research confirmed this, as many employees I interviewed who were working with Title IX have this as an additional part to their already full-time position. People at smaller institutions often lament that bigger institutions have separate people assigned to work specifically with survivors and charged rather than one employee playing both roles, so “then there's not the multiple hat wearing.” Larger institutions often mentioned that the people they work with regarding Title IX “don’t oversee [those positions] as [they] really function as [deans].” All institutions, large and small, are struggling with not only a lack of full-time employees, but with these employees often having other contracted positions. The Oregon Sexual Assault Task Force has noticed this as well, noting that they “wish that every advocate or interventionist could have a full time job doing that as

opposed to a size of one of the 14 roles they have to do...you don't have to be the advocate and the school librarian and the prevention person and whatever else...”.

### *Conclusion*

Out of the 11 interviews I conducted of Oregon public institutions, the work being ‘unsustainable’ kept seeming to creep up in conversation. Across geographical areas, student numbers, funding, and number of employees- every single person that I interviewed thinks that their job, or the department at the very least, is unsustainable and my research shows it will continue to be with a continued lack of funding. Some staff members were more hopeful in tone, mentioning that “most institutions are always tightening their belts” in order to attempt to disperse the issue of funding to a more broad issue of public institutional funding. It is worth noting, however, that more often than not, belts are unproportionally tight and were never loose in these departments in the first place. All staff members hoped for a reevaluation of their department of some sort, as they feel it is unsustainable in its current form. OSATF, overseeing and in contact with all of these institutions, see this unsustainability and know that institutions are “running the folks who do this work into the ground by expecting that they have that big of a reach... which is a disservice to all of those different really important issues.”

### Communication and Support is Lacking Throughout Campuses

For many people working on Title IX, their office is the only place in which they can be heard and advocated for as well as the much larger difference between being pushed aside and getting holistic care. Survivors of sexual assault face an impact of every part of their lives from their academics, to housing, to food security, to mental health. Therefore, the works of



Title IX should also be reflected in all aspects of campus and not confined to one designated office area. When conducting interviews, I felt frustration from staff members regarding feeling like they were alone in their work. As one staff member stated, “you sometimes end up working on an island, so I guess [I feel supported] as much as an island can be supported by other land.” Title IX and resource departments are inherently an integral part of a larger campus culture and conversation for both staff, faculty, and students, but they are often left to listen to the conversation rather than able to manipulate and advance it.

This issue can be solved largely due to increasing communication regarding Title IX issues across campus in order to develop support from various other departments. Extensive support for the mission of Title IX creates a campus culture of connectedness and support. And if the Dear Colleague Letter has done anything at an individual campus level, it has allowed for campuses to begin to have those conversations. But a mere conversation is not enough, an interactive and constant dialogue regarding Title IX and prevention and how the entire campus can affect and work on these things are needed. In order for these dialogues to be effective, they need to be constant and educate faculty and staff members regardless of department.

One interview I conducted focused on a sexual assault related grant that one school received which greatly helped create a connection between the Title IX office and the conduct officers. As they state, “[they] had no connection with [their] Title IX officer before the grant and that, if anything good came out of the grant, it was the coordinated community response with all of the areas that work with Title IX coming together and making such a commitment.” This particular institution received this grant an unprecedented amount of times, which is something the school says was really due to the drastic improvement of communication and commitment throughout the entirety of the campus. Creating these

connections are incredibly important for these departments as well, as they are constantly referring students to various resources. As two interviewees state, “we aren’t experts in everything,” and “anyone... could serve students in crisis especially when the crisis means to listen and validate and then refer to the right resource.”

From the people I spoke to, everyone seemed to be very invested in getting students the right resources, even if that meant admitting that it wasn’t that office. “We aren’t experts in everything”, one staff member said, but they would also “like other offices to [have a reciprocal] relationship with [our] office” in order to create a dialogue across departments that has each one’s respective expertise shine while leaning on others for support.

But these conversations don’t need to happen exclusively within departments and offices that include Title IX within their scope. As the Oregon Sexual Assault Task Force notes, it is important to “capitalize on the faculty that are interested,” especially in having faculty be a part of this dialogue and “integrating it into their curriculum without causing more work for them.” In order to truly find ways in which one can create connections throughout campus to keep sexual assault visible, these connections have to look more like a web across the organizational structure rather than a line. While many see Title IX issues as extending only to the administration of an institution, it can be incredibly beneficial to include faculty from all departments in this conversation. Faculty members are often not included in these conversations, and are therefore not educated in issues related to Title IX. This can easily pose a problem as faculty cultivate a large part of an institution’s culture, and not bringing these issues into the classroom can create an environment in which it feels okay to ignore problems that are happening right in front of us. Bringing faculty into this discussion doesn’t need to be intimidating either, and can be done quite creatively. As OSATF mentions, they have had huge success with schools who have “faculty in the art

department [pair] with our prevention folks around designing their posters and then their students get really excited about it.” Another success was a class “[using] large data sets of campus climate surveys as one of the big projects throughout the semester, and so throughout that one of the things they're doing is they're learning to analyze data by using those data sets and they analyze the questions as part of how questions can be asked better.” Or, as one University staff member suggested, having “[Title IX and mandatory reporting] be put in the syllabus. We talk about plagiarism in the syllabus, we talk about whatever else, why not [talk about Title IX].” OSATF has been having a lot of conversations recently regarding creatively and “intentionally involving faculty in the work that we do.”

### *There is No Constant Dialogue Regarding Title IX and Prevention*

Conversations related to sexual assault should not only be happening when a sexual assault occurs or a survivor comes forward. In addition, these conversations should not be confined to the walls of an office dedicated towards having these conversations. Campus culture can, for lack of a better phrase, make or break, the way that a survivor acts and receives resources and support after experiencing a trauma. Campus culture is created throughout the entirety of a campus and therefore the entirety of campus should consistently be having conversations regarding Title IX and prevention work. OSATF mentions that one of the benefits of dissemination of the Dear Colleague Letter was that “because there was either panic or a lot of like ‘oh my gosh we have to do something’ energy around it, it brought a big scope of faculty, students, and other folks that maybe wouldn’t know or see that as part of their role to start being a part of these conversations”

Even after this dissemination, these conversations are not widely happening, and the people working with Title IX know this and actively feel the repercussions. Even when these

discussions are happening, the staff members are not involved when they should be. As one staff member mentioned, “We aren’t always invited to the table when I think we should be and, again, I don’t think we’re alone in that experience. I think other institutions have also seen some of that. Sometimes I think people are making decisions for us, and they’re not us and they don’t do our work every day.” This dialogue needs to allow the people working on the ground to sit at the table, or else the chances of productive decisions being made are greatly reduced.

### *Many Faculty and Staff are not Educated on Title IX Issues*

Campus-wide conversations are rare and rarely effective when faculty and staff members are not educated on Title IX and how it can affect their classroom or office. OSATF mentions that if more faculty and staff members have a “shared understanding of some of these topics... the work would get done faster because the two or three folks that... have that job wouldn’t have to be constantly saying this is why you should care.” While it can be hard to get faculty and staff to listen to these policies and why they are important, OSATF also says that after the release of the Dear Colleague letter, the introduction of responsible employees “illuminated the importance of getting these people on board and in these conversations real fast.”

While the dissemination of these policies have helped nail down the importance of including everyone in Title IX discussions, current Oregon university staff don’t always feel that other departments are ready or willing to be included. When asked how they feel about their faculty involvement with Title IX on their campus, one interviewer said “it really depends on how personally invested a faculty member is in understanding Title IX issues.” And while they assume that most of their faculty are “interested in being supportive and

responsive to their students, there are a minority of faculty who express pretty strong resistance to providing students with accommodations.” Whether faculty are intentionally being unsupportive of Title IX issues or if they already are being overloaded with their contractual responsibilities, it’s portrayal can have severe impacts on how students needing resources see whether their institution is willing (or unwilling) to help them.

### *Conclusion*

With policies as important as Title IX affecting entire institutions, it only makes sense that entire institutions have these important conversations. In order to have these conversations, the urgency and bright eyed demeanor that college campus staff and faculty felt after the Dear Colleague Letter was published needs to continue--faculty and staff need to understand that the implications of sexual assault intertwine with every aspect of survivor’s lives and act accordingly. This conversation doesn’t necessarily need to add on to the workload of staff and faculty that work outside the direct scope of Title IX. Many staff members I interviewed recognize that burnout can happen to anyone, especially in higher education. Because of this, they offer up many ways in which this conversation can be broadened: adding a Title IX and mandatory reporter synopsis into a class syllabus, including the art department when making campus resource papers, and more. In addition, Title IX staff need to be included in policy making decisions. It only makes sense to invite those who work most closely with implementation of policies to the table. Not only will this help discussions move along, it can create more trauma informed policy changes and implementations.

## Focusing on holistic care: Strengths and Weaknesses

One of the most surprising and transformative themes that was brought up in the Oregon Sexual Assault Task Force interview was how they focused on everything connecting with each other. When describing their organization, they mentioned that their mission includes that the “believe the prevention of sexual violence is possible and that everybody has a role in doing that.” Holistic care and trauma-informed care were both heavily mentioned philosophies within all of my interviews. Even when not explained explicitly, interviewers mentioned how they constantly work with various departments and off-campus organizations that aren’t necessarily related to Title IX cases but are often needed in congruence with their office. These can include things like alternative housing, food pantries, legal systems, and hospitals. And these referrals can happen regardless of what the particular survivor wants, as one interviewee mentions: “I guess for all students we offer support in navigating the different systems they might report to including university and law enforcement. We also help them access all sorts of interim measures and support resources regardless of whether or not they choose to make a formal complaint.” Sentiments like this one is echoed across all of the interviews, with various other schools stating that “[their] advocacy looks really and is based on and defined by what the student needs,” and “holistically... we need to be more in the basic needs business maybe because all that stuff is connected.” As illustrated in the past two quotes, focusing on holistic care within departments allows for reflection of the benefits as well as desiring and coming up with plans to improve on the lackluster portions of their work.

*Holistic care and support accomplishments*

With a seemingly dried up pool of funds going towards Title IX departments, I was surprised to see how many comprehensive services many of these institutions were able to provide to students who need them. As one institution stated, “We offer a 24 hour hotline, we are also on call for in person medical and legal advocacy 24 hours a day, seven days a week. We offer access to housing interim measures, sometimes on campus, sometimes off, we provide emotional support and medical advocacy, whether that’s SANE or follow up appointments. [We offer] legal advocacy which doesn’t mean we are attorneys but that we can walk through the legal system.” This is heavily related to a goal OSATF strived to create, wherein students can receive comprehensive wraparound services from coordinators and investigators who had multiple weeks of training on how to conduct investigations through trauma informed care. Many of these institutions felt proud about what they were able to do regarding providing trauma informed care, transparency, cooperation, and creating new expectations in various situations that their students may face in college and beyond.

When discussing the work that they are able to do and resources that they are able to provide for students, all of my interviewees mentioned that they are proud to and work hard on providing trauma informed care. One interviewee stated that their department focuses on “trauma informed care, transparency and cooperation, so that sometimes that means transparency around the institution,” and another staff member mentioned that being trauma informed in universities is “being trauma informed in the system, no matter what the system, [which can be] completely backwards from what the system expects.” Sometimes exactly what a student needs when they are in trauma is exactly what the system doesn’t account for, and that is precisely where trauma informed care shines.

This works both ways too, as the OSATF states, “sometimes there’s a piece of legislation that we wouldn’t have thought as impacting sexual violence or procedures on campus and it actually does.” Providing holistic support and trauma informed care starts by looking at legislation comprehensively. While universities in Oregon are able to provide this robust care in some areas, they were all also able to point out many ways in which they would love to improve their services.

### *Improvements Needed on Holistic Care and Support*

When discussing ways in which these departments think they could improve regarding holistic care, funding was brought up a lot, which is unsurprising because the ability to provide comprehensive care and the amount of funding a department receives usually coincide with each other. Many universities even mentioned this covertly, stating, “I would love more money so we can better support folks... We can help them with a small amount of money, we can tell them where the other small amounts of money are but I can’t just pay somebody’s rent for three months or something.” In addition to this, these departments express having a hard time supporting students in “navigating the different systems they might report to including university and law enforcement.”

OSATF understands this, and they try to help mitigate the monetary burden of some of these by providing comprehensive prevention training for coordinators free of charge. These trainings, which happen a few times a year are framed with oppression as the root cause of violence. This allows the training to focus more on holistic care by addressing the root causes of violence, creating safe spaces, and helping to shift norms. When addressing oppression as the root cause of violence, these trainings help prime university staff members to work holistically when addressing Title IX issues, and staff members can tell this is



needed. One told me that “[they] think [they] need to be more in the basic needs business ... because all that stuff is connected.” If universities bolstered funding for Title IX programs, they would likely see these departments provide better trauma informed care, change campus culture through having the capacity to reach out to university faculty and provide materials for their classes, and even look at all institutional policies more holistically. Because Title IX issues affect every aspect of a student’s life and community, focusing on improving the capacity of those working in Title IX will therefore affect every aspect of student life, community, and campus culture.

Because the university staff I spoke with understand that Title IX can affect many different facets of life and various identities, they wish they could improve on their holistic care and support through being able to recognize and mitigate these additional factors that come when one tackles violence. One interviewee mentioned that they wished “there would be some way of mitigating the impact to [the students’] school work both in terms of missed classes and that stress but also their ability to perform right.” Another person mentioned that they are particularly interested in using their position’s power to look more into how to have “culture specific resources” because they believe “violence looks different for many people [with] diverse backgrounds.” Both goals mentioned come down to two needs of Title IX staff: university funding and dialogue. With increased funding, these staff members could increase their offices’ capacity in creating a web of Title IX discussions throughout campus - including class curriculum and other identity-based resources the institution provides.

### Connecting the Themes

When looking through all of these interviews, I noticed how interconnected all of these common themes are. The improvements on holistic care that these staff members

mentioned they need included funding and increasing communication throughout campus regarding Title IX issues and procedures. Staff members working with Title IX focus on providing trauma informed care, but wish they were able to provide it better. In order to provide more trauma informed and holistic care, they need increased funding and they need to have institutions partake in conversations regarding these policies more often and with a larger portion of campus.

When interviewing staff members from Oregon public institutions, I noticed an interesting theme regarding responses and tone between staff members that worked with conduct and staff members that worked more with resources for survivors. Staff members who worked with conduct were much more cautious regarding what they were able to say and more meticulous regarding how their interview would be shared in my thesis. When working with people who focused on providing resources and advocacy for survivors I was met with pleasant conversations which took the tone of a caring mentor; pointing out flaws in the system while providing tangible suggestions for improvement on both ends and no lack of playful banter. When I began my interviews, I took this as calling people on good or bad days, but by the end of them I noticed that this pattern continued with all 11 staff members. I began to expect curt comments or insightful conversations based on job title and position descriptions, and consistently I was proven correct. There are two things that I take from this pattern: (1) the staff working with conduct are so incredibly overwhelmed and overburdened with the unsustainability of their positions, departments, and forced implementation of intangible policies and have no more energy to expend on additional tasks such as an undergraduate student asking them questions; (2) these staff members know consciously or unconsciously that the legislation that wrote their department into existence is inherently flawed but feel cornered by that same legislation that threatens federal funding

with indiscretion and only provides unsustainable departments with continence. Either way, I think it shows the true unsustainability of these programs with the way they are currently designed and implemented.

## **Analysis**

Just as expected, my research found large gaps between policies and their implementation. With policies created around a world with abundant resources interacting with a world where even time and support is restricted, it is not surprising that those needing these resources are feeling like they are lackluster. The people working on the ground implementing these policies are not given adequate resources, only potential consequences. This creates a culture around their workplace that focuses on keeping what little resources are available rather than empowering survivors to get the help, support, and healing that they need.

When talking to people on the front line of these policies across Oregon, I saw frustration. I saw frustration in what could be better, frustration in how resources are not given to support workers with a task that goes against the fiber of society and the patriarchy, I saw frustration in institutional colleagues that only work against the support that they are working so hard to achieve. But, even more so than frustration, I heard hope. I heard how hard these staff members are working for a common cause, how much erasing violence in the main threads of university culture means to them, how their little victories amongst a flood of losses keep them afloat and smiling for yet another federally mandated 9-5 day which often bleeds into yet another 24-hour red eye shift.

Common themes found through my interviews and knowledge on current policies have led me to three conclusions that I believe should be considered for not only current

and future policy makers, but for all advocates who are pushing for change surrounding sexual assault, particularly around college campuses.

**1. It is unethical to create policies related to healing trauma without also providing adequate and necessary resources to do so.**

In my research, the most common and most unsettling theme was a lack of resources. A lack of resources for university departments focusing on Title IX doesn't simply mean that the office isn't open during lunch. Budget can be the first start of a survivor's healing and potential reporting journey. Budget can allow for more staff within a department, evening out the ratio of support staff and students to lower the amount of cases one staff has to take on at a time, but also providing more flexible schedules for staff and even making after business hours resources available for students within an institution. Not only are current policies not providing the resources needed to those that they affect, they are creating a culture in which being unable to follow policy guidelines results in punishment and threats to pull back institution-wide funding. This lack of providing support but threatening major consequences for failure creates a culture in which departments working with Title IX and sexual assault survivors have to put most of their attention and energy into following specific policy guidelines in order to stay afloat rather than truly helping survivors at their university.

Moving forward, it is imperative to provide resources alongside policy guidelines and procedures. Many institutions spend a large majority of their time applying for and recording their work for grants, when that time could be better served supporting their student population. Higher education, especially public universities, are not at a loss for programs in need of funding, so it is understandable that services that don't help directly bring the school

money (admissions, financial aid, faculty) are on the backburner of budgets. But continuing to do so can quickly create an unsustainable faculty and staff culture, and therefore student culture, within the institution. At the end of the day, these essential services are what can be the make or break of a student's higher education career. A less-than-satisfactory experience with Title IX offices after trauma constantly inhibits students from completing their degree within an intended four years, or from completing it at all. The core of these less-than-satisfactory experiences are the unsustainability of the departments, not antagonism of staff members towards their student population.

A simple way in which these departments can become more sustainable is through department, policy, and procedure reform in order to create an office that is able to work long-term without burnout rather than focusing on a year-by-year basis, or just until the next break between cases to put things back in order as much as possible. Reworking structure from the ground up, using state and federal policies as a minimum, and allowing new academic knowledge to support new systems can take time but it will ultimately change the outputs of these offices for the better, create more stable communications and procedures, and reduce staff burnout and turnover.

## **2. Policies are a basement floor.**

If meeting with the Oregon Sexual Assault Task Force taught me anything, it fundamentally shifted the way in which I look at policy moving forward. Policy does not create the drywall of a house, which creates corridors, hallways, and doorways that must be followed. It creates the foundation, a safe spot for everything to grow upon. The rest of the house must be built on this foundation, but policy enactors need to look at who they are catering to. This is especially important within universities as it is well known that each

campus creates its own microcosm of society, and no one pre-set policy implementation guide will work on all university campuses.

Similarly, one foundation can create wonders of a housing structure if the time, energy, and thought is put into what is being created. Universities have the ability and should be looking at these policies, comparing them with research within the field, and creating additional structures and processes off of governmental guidance. This, of course, cannot happen until universities have the resources to do so. Funding and resources should not be explicitly capped at what is written in policy, which both fails to provide enough resources for departments (as we have seen) and also doesn't allow these departments to implement policy, create structures, and support programs that will benefit their particular university culture. While it is fiscally unsustainable to provide unlimited funding to any group, it causes deep communal trauma to continue to refuse additional resources and services to Title IX policy staffers.

The Oregon Sexual Assault Task Force has this as one of their core beliefs, and they make sure to reflect that in their work with individual institutions. When advising staff members, they make sure to learn about campus culture, core majors that the university boasts, and additional services or programs in order to correctly identify and brainstorm various ways to implement policies and create new systems throughout the university. It is crucial for university administrators to understand this when they are analyzing federal and state policy and building upon those for their institution. Nothing is a one-size-fits-all, and policy regarding sexual assault and trauma is definitely one example of that.

### **3. Implementation cannot be successful with unsuccessful policies.**

Policy that addresses trauma without being trauma-informed simply cannot not be successful. And that is what we are seeing right now: policy that lacks being trauma informed impacting a work that requires workers to provide trauma-informed care to be successful. Making amendments to current policies in order to frame them with trauma-informed verbiage is possible, and can be simple when policies are looked at holistically while considering inherent and allocated resources that will be used to support the policy. While reworking these policies, it is also important to keep in mind various contexts and environments in which they are geared. Is the language providing flexibility for different university cultures to adapt and assimilate new structures into their institution? Is it pushing for trauma-informed care, for holistic support across university departments, are these policies providing necessary resources and support in plain language, or only threatening an institution shut down? In order for Title IX policy to work on a legislative and grassroots level, everyone affected by these processes needs to be consistently involved in policy creation and emendation.

Similarly, Title IX departments and sexual assault resource centers or departments cannot be successful without each other. A constant gap between these two offices was seen in all of the universities that I interviewed. This creates confusion for survivors as they now have to navigate two separate departments in order to get the support they need, and it makes it worse when these departments aren't practicing trauma-informed communication openly with both the survivor and each other. For example, survivors who wish to only receive support may go to the Title IX office, which then starts a mandatory investigation causing implications within their life that they were hoping to avoid. Alternatively, a survivor who wants to go through a formal trial process may have to continuously retell their story if

they start by reaching out to the wrong office. In both cases, offices aren't providing necessary communication to the students or between each other in order to provide holistic care through communicating which systems within a university need to be navigated for each student's needs.

In universities, this includes but is not limited to communication between policy makers in all forms and departments, adjudication and resource offices, and between offices and the rest of campus. Increasing communication between policy makers and policy enactors will increase discussion about future implications of policy and increase knowledge on both ends of the discussion. Universities will be able to directly advocate for themselves and policy makers will get first-hand experiences, knowledge, and perspective from those who will be most affected by the policies they are writing. University administrators need to be adamant about including the entire campus infrastructure in conversations about sexual assault. Assault doesn't happen within the confines of one office, and healing doesn't finish the moment a student enters into another sector of campus. Having trauma-informed training, conversations, and resources throughout the entirety of campus can make the difference between Title IX departments feeling like they are acting on a stand-alone island and feeling genuinely supported from the rest of the institution.

## **Conclusion**

When looking at policies outlining Title IX and sexual assault support and how these policies are implemented on college campuses in particular, it is not hard to tell there is a disconnect. This thesis has gone over these policies, how particularly federal policies have shifted for better or worse over the past 20 years, and how the state of Oregon has been able to expand on these policies and interpret them in ways that best suit the state. The Oregon



legislature created the Oregon Sexual Assault Task Force as a way to bring together multidisciplinary activists to tackle sexual assault. OSATF has been able to support universities individually, as well as many other sectors such as criminal justice, legislation, advocacy and more.

Looking at Oregon Public Universities as a whole shows that even with task forces created in part to specifically support these institutions, departments focusing on Title IX and sexual assault are still struggling to stay afloat. These departments report burnout, unsustainability, lack of staff compared to their student body, lack of support with the rest of the institution, and a consistent resource deficiency. All of these culminate into what we are seeing now. Unsuccessful systems creating additional trauma for the students and staff, campus wide confusion regarding the reporting and adjudication process. But, more importantly, this creates staff members that are dedicated more than anything to their job. It takes staff that will work 40+ hour weeks to support the students that receive the most mental harm from these system failures, that will work overtime to search for grants to help them. Staff members that can, and do, put a critical eye against the very office that they work in order to say confidently how they are succeeding and the many ways in which they know they could improve, but if only. If only there were more resources, more support, more hope in the system, more understanding that these systems can thrive and absolutely change campus culture if they are structured around societal deficiencies rather than independent breaks.

This system is broken, that is well known. Research has proved that; policy amendments and Dear Colleague Letters state that almost verbatim. But maybe it's not in the way we originally thought it was. Maybe both policies (to some extent) and those on the ground only have the best of intentions yet they were not created with each other or

sustainability in mind. We need to listen to these deficiencies, listen to what is happening, learn how to make things better, and actually support departments which help create a backbone of student satisfaction. Maybe the reason we seem to keep seeing the same story over and over is because we are not looking at the authors - we are not looking at the systems that are creating these dialogues to play out. These stories will and are still happening because we have not truly reevaluated what needs to change, and the core of that is to create sustainable systems within universities.

The end. Of the thesis, but of much more that can be captured in these pages.

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## Appendix A

1. Can you tell me a little bit more about the history of OSATF? What is the mission of your organization?
  - a. How do you see this mission play out in your policies, trainings, etc.
2. How do you keep up with the constantly changing federal and state policies and guidelines surrounding adjudicating sexual assault cases on college campuses?
3. How did your advocacy/work change after the Dear Colleague letter?
  - a. How did or will it change with the new guidelines proposed by Betsy DeVos?
4. When you and/or your organization disagrees with a guideline, policy, or precedent, how does that impact the work that you are doing and the message you put out via training and guidelines?
5. One thing I've noticed in my research is a lot of inconsistency in language use (for example, the implications of using victim vs survivor vs complainant vs accuser, or the implications of the changing and often inaccessible definitions of the term "sexual assault,"). In light of this, how do you advocate for policies that are consistent and accessible, and that mitigate the perceived implications of these word choices?
6. If you were to create a perfect world, what types of policies and implementations would you create for college campuses?

7. Sexual assault is different in various environments, and on college campuses is a rather interesting environment considering how many factors play into campus culture in general and regarding sexual assault. What different approaches do you take in regards to approaching college campus sexual assault, specifically in areas such as campus climate, education, prevention, resources available, training, and adjudication?
8. What additional considerations do you need to think about when approaching this issue on campus versus in other environments?
9. There is currently a lot of tension surrounding sexual assault on college campuses. How do you create documents, trainings and guidelines for people across the political spectrum, especially people who might be more inclined to side with the accused?
10. What are the biggest issues that you can identify in assault policy implementation on college campuses? (lack of accessible resources for students, inconsistency of definitions, education, campuses not using your resources, etc)?
11. What do you see as the biggest shortcomings, if any, of the work you are doing with OSATF?
12. Are there any things you want to add, or any questions I didn't ask that you think I should?

**Appendix B:**

1. Do you have a copy of your official job description you can share with me?
  - a. Either way: In your own words, how would you describe your position responsibilities specifically as they relate to Title IX?
2. What resources do you have available to you in order to finish these position responsibilities? (Examples include: staff, grants/funding)
3. Do you feel that you can be successful in your job with your current amount of resources at your disposal?
4. What additional resources do you think you would need in order to be more successful at your job?
5. Do you feel supported in your current position in non-monetary ways, for example, do you feel supported in your overall mission as it relates to Title IX?
6. In the ideal world, what additional services and support with the university need to best support students as they go through the formal reporting processes for Title IX violations?