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> Gentral Florida

## MOVING BEYOND TITLE IX: AN EVALUATION OF THE COMPREHENSIVENESS AND ACCESSIBILITY OF POLICIES AND PROCEDURES FOR PREVENTING AND RESPONDING TO GENDER BASED VIOLENCE

by

### ALYSSA MULLINS B.A. University of Florida, 2010

A thesis submitted in partial fulfillment of the requirements for the degree of Master of Arts in the Department of Sociology In the College of Sciences at the University of Central Florida Orlando, Florida

Summer Term 2013

#### ABSTRACT

The current study examines the gender based violence policies and programs of large, public universities in Florida. Current literature argues that preventing and responding to gender based violence in institutions of higher education requires comprehensive and ecological techniques at the individual, interpersonal, community, and societal level. In recent years, various institutions and agencies have showed increasing administrative commitment to addressing these issues. Futures Without Violence, formerly named Family Violence Prevention Fund, is a private organization that has established a set of guidelines and recommendations to aid IHEs in their response and prevention of gender based violence, intended to exceed federal regulations, such as Title IX and the Jeanne Clery Act. The current study used the guidelines and recommendations established by Futures Without Violence to perform a content analysis of ten large Florida universities' websites to determine the comprehensiveness and accessibility of each university's gender based violence policies and procedures. Findings indicate various levels of compliance within and among the universities. Thus, the current study outlines the generalized findings among all universities, describes the strengths and weaknesses of each university's policies, and provides recommendations for these institutions as well as future exploration of the feasibility of these guidelines and recommendations in practice.

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## LIST OF ACRONYMS/ABBREVIATIONS

| LOTUS<br>MARC<br>MOST<br>MVP<br>NSU<br>REAL<br>RENEW<br>SRR-SCC<br>SPEAK<br>STRIVE | Counseling Outreach Peer Education (UM)<br>Center for Professional Development & Training (UNF)<br>Equal Opportunity/Affirmative Action<br>Florida Agricultural and Mechanical University<br>Frequently Asked Questions<br>Florida Atlantic University<br>Florida Atlantic University Police Department<br>Florida International University<br>Florida State University<br>Florida State University<br>Florida State University<br>Family Violence Program (NSU)<br>Futures Without Violence<br>Gender Based Violence<br>Institution of Higher Education<br>Intimate Partner Violence Assistance Clinic (UFL)<br>Knights Helping Advocate Resiliency in Emergencies (UCF)<br>Ladies Opposed to Unsafe Sex (FAMU)<br>Men Advocating Responsible Conduct (FSU)<br>Men of Strength (FAMU)<br>Mentors in Violence Prevention (UCF)<br>Nova Southeastern University<br>Relationship Equality and Anti-Violence League (USF)<br>Realizing Everyone's Needs for Emotional Wellness (FSU)<br>Student Rights and Responsibilities Handbook – Student Code of Conduct (UM)<br>Speak Out, Prevent, Educate, Advocate & Know (FAMU)<br>Sexual Trauma/Interpersonal Violence Education (UFL) |
|--|---|
| MOST   |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  | <b>-</b> , , , , , , , , , , , , , , , , , , ,  |
|  |   |
| STRIVE   | Sexual Trauma/Interpersonal Violence Education (UFL)  |
| UCF  | University of Central Florida   |
| UFL  | University of Florida   |
| UM   | University of Miami   |
| UNF  | University of North Florida   |
| USF  | University of South Florida   |
| VAVP   | Victim Advocacy & Violence Prevention (USF)   |
| VEP  | Victim Empowerment Program (FIU)  |

#### **CHAPTER ONE: INTRODUCTION**

Gender based violence, as referring to intimate partner violence, sexual misconduct and/or stalking (Fleck-Henderson 2012), is a prevalent issue that is increasingly gaining the attention of the criminal justice system, public health agencies, and various other institutions and social organizations. Findings from the National Intimate Partner and Sexual Violence Survey (NISVS) suggest that intimate partner violence, sexual violence, and stalking are often first experienced during adolescence and remain prevalent among 18-24 year olds, indicating that women aged 20-24 experience the highest risk of dating violence (Black et al., 2011). In recent decades, a growing awareness of the impact and prevalence of gender-based violence (GBV) among adolescents and young adults has led to an increasing need to establish education and prevention policies and programs to target this issue (Fleck-Henderson 2012). As such, schools have been identified as fundamental arenas for promoting awareness and prevention among these age groups due to the widespread outreach potential at students' crucial developmental stages as well as the structured nature of the institution (Crooks, Jaffe, Wolfe, Hughes, and Chiodo, 2011).

Colleges and universities, or institutions of higher education (IHEs), play an additionally vital role in this process, as research suggests that female college students between the ages of 18-24 are more likely than non-students to experience rape/sexual assault and stalking (Bopp, 2005; Armstrong, Hamilton & Sweeney, 2006). It is also estimated that one in five undergraduate women experience some form of sexual assault during college (Krebs, Lindquist, Warner, Fisher, & Martin, 2007). While IHEs are required to comply with Title IX anti-discriminatory policies as well as the Clery Act's obligations for reporting crime statistics,

research suggests that "students, and women in particular, are exposed to high risks of sexual violence on campus" (Karjane, Fisher & Cullen, 2002, p. vi) and rates of sexual assault have not declined over the last 50 years (Armstrong et al., 2006). This information, paired with public awareness of negligent institutional responses to high profile cases in the past (Lombardi, 2010; Fleck-Henderson, 2012), has recently been met with increasing administrative commitment to awareness and prevention policies, led by Vice President Biden, including the Department of Education, Office of Civil Rights' (OCR) *Dear Colleague Letter* of April 2011.

Similarly, IHEs have been motivated to review and revise their existing policies, and interested third parties have begun to contribute proposed policy suggestions and program evaluations designed to build on and enhance efforts on campuses (i.e.: Potter, Krider, & McMahon, 2000; Yeater, Naugle, O'Donohue & Bradley, 2004; Fleck-Henderson, 2012). Futures Without Violence (FWV), formally the Family Violence Prevention Fund, established a particularly comprehensive set of strategies, compiled into a report titled *Beyond Title IX: Guidelines for Preventing and Responding to Gender-based Violence in Higher Education* (Fleck-Henderson, 2012). This set of guidelines warrants examination in relation to existing policies across university campuses. As such, the purpose of the current study is to examine whether the gender based violence policies and programs of large, public universities in Florida meet the recommendations of the FWV guidelines, in addition to the extent to which this information is readily accessible on schools' official webpages.

#### **CHAPTER TWO: LITERATURE REVIEW**

#### **Responding to Gender Based Violence**

Societal responses to gender based violence often focus on providing services and crisis intervention after an incident has occurred. However, despite the importance of these services, intervention is an inadequate means of addressing the complex dynamics of GBV, on its own. For instance, even with innovative intervention responses in the criminal justice system (Jackson, et al., 2003; Davis, O'Sullivan, Farole, Jr., & Rempel, 2008; Logan & Walker, 2010), Guzik (2008) found that batterers continue to "understand their punishments as unfair sanctions... by an unjust local legal system rather than as the consequences of their own actions" (p. 113). Instead, there has been increasing advocacy for more proactive, prevention techniques (Wolfe & Jaffe 1999). As a result of this need, prevention based models are increasingly popular, especially among public health campaigns, which encourage healthy behaviors and address the underlying causes of GBV (Wolfe & Jaffe, 1999).

While various prevention based models use a number of techniques, often rooted in criminal justice or public health policy, Potter and Krider (2000) provide an analysis of the similarities and differences between the public health and the criminal justice techniques, advocating the need to integrate both approaches in order to address GBV more comprehensively. They argue that both criminal justice and public health utilize the three types of prevention: primary, secondary, and tertiary; however, public health approaches often use more proactive, primary methods targeted toward entire populations. Meanwhile the criminal justice system is said to utilize secondary or tertiary techniques, emphasizing a more

reactionary approach targeted at high risk or previous offenders to prevent crime from reoccurring. Some techniques used in the criminal justice system to aid in the deterrence of GBV include mandatory arrest laws (Hirschel, Buzawa, Pattavina, & Faggiani, 2008), batterer intervention programs (Jackson, et al., 2003; Kernsmith & Kernsmith, 2009), and civil protective orders (Logan & Walker, 2010). However, these practices are generally short or long-term responses to violence that has already occurred, with efforts directed at selected or indicated populations, or those that have had, or are more likely to have, experiences with violence (Graffunder, Cline, & Lane, 2011).

For instance, in an analysis of the effectiveness of civil protection orders, Logan and Walker (2010) found that there were considerable reductions in abuse and violence among victims/survivors that had obtained the civil order, and approximately half of the orders were obeyed. Additionally, the women in the sample were generally less fearful of experiencing future harm; however, stalking emerged as a significant risk for violations. Thus, while protective orders appear to reduce abuse and decrease the financial burden of GBV on the state, the other 50% of victims/survivors that did experience violations, as well as the sentiment that protective orders are 'just a piece of paper,' warrant further research into why reactionary prevention measures alone cannot eradicate GBV as a social issue.

Similarly, batterer intervention programs (BIPs), which emerged to hold perpetrators accountable without incarceration, also intend to alter the participants' behavior in the future. However, research by the National Institute of Justice found that BIPs often have little to no lasting effect on the behaviors of perpetrators (Jackson, et al., 2003). Additionally, mandatory arrest laws in many states have led to a higher arrest rate for domestic violence cases (Hirschel,

et al., 2008), emphasizing a much needed zero tolerance policy for abuse (Wolfe & Jaffe, 1999). However, this reactionary measure often results in higher rates of dual arrest, holding women equally responsible for violence as 'mutual combat' (Kernsmith & Kernsmith, 2009). One of the many consequences of this practice is the increased ineffectiveness of assigning those arrested to batterer intervention programs. BIPs often exclusively target males, and research suggests that females commit acts of violence against men in different contexts, for different reasons (Kernsmith & Kernsmith, 2009). Thus, an already ineffective technique to prevent future violence is especially futile when female perpetrators are subjected to services that do not address their particular circumstances. Instead, these researchers argue for the use of comprehensive screening processes, as well as varied approaches at prevention and education.

#### **Preventing Gender Based Violence**

Research often suggests that secondary and tertiary prevention has limited effectiveness at preventing violence from occurring in the future. Thus, primary prevention techniques, or the approaches that take place before violence has occurred, more comprehensively address the underlying causes of GBV. For instance, in a review of Schwartz and DeKeseredy's male peer-support model, Whaley (1998) summarizes that the perpetration of sexual assault involves multiple factors, including broad socialization in a patriarchal society. Thus, the male peer-support model provides evidence that societal and group ideologies, as well as situational factors, contribute to the perpetration of GBV. As such, primary prevention techniques can be used to "introduce to particular population groups new values, thinking processes, and relationship skills that are incompatible with violence and promote healthy, nonviolent relationships" (Wolfe & Jaffe, 1999, p. 136). Since schools are often locations for a great extent of social learning among adolescents and young adults, many proactive prevention techniques have been implemented into campus curriculum and policies.

Violence prevention programs in schools can be executed as early as preschool (Wolfe & Jaffe, 1999), however, programs related to GBV often focus on dating violence in middle or high school (Rosen & Bezold, 1996; Avery-Leaf, Cascardi, O'Leary, & Cano, 1997; Foshee, et al., 1998; Antle, Sullivan, Dryden, Karam, & Barbee, 2010) or sexual assault and stalking in colleges and universities (Potter, et al., 2000; Karjane, et al., 2002; Armstrong, et al., 2006; Truman & Mustaine, 2009). Hodoka, Martin Del Campo, and Ulloa (2012) argue that substantial changes take place for adolescents between 7<sup>th</sup> and 9<sup>th</sup> grade, in relation to dating patterns and experiences with dating violence. Thus, these researchers recommend timing primary dating violence prevention programs at a time when students are likely to find the topic of dating relevant to their lives, but are unlikely to have experienced dating violence. Similarly, Safe Dates is often cited as an example of an effective dating violence prevention program for 8<sup>th</sup> and 9<sup>th</sup> grade students, utilizing primary and secondary tactics (Foshee, et al., 1998). However, while an evaluation of Safe Dates showed that participants' had increased education and awareness, as well as attitudinal changes that were less accepting of dating violence, behaviors and help-seeking did not appear to be positively impacted by the program (Cornelius & Resseguie, 2007).

However, despite attempts at early intervention, sexual assault and stalking remain a major issue for students, especially females, in institutions of higher education. For instance, Armstrong, Hamilton and Sweeney (2006) argue that rates of sexual violence among college

students have not declined in the last 50 years, indicating that federal laws and institution based policies have yet to fully tackle these problems. In fact, Armstrong, et al (2006) argue that sexual assault in college is often a result of gendered, cultural expectations of partying. Meanwhile, they argue, the use of alcohol and low level forms of coercion often limit understandings of these experiences as assault. This, paired with the fact that the majority of sexual assailants are known to the victim, lead to low reporting and lack of sanctions. Similarly, there are also multiple reasons for low reporting of stalking among college students. Much like sexual misconduct, the majority of victims of stalking know their offender in some capacity (Catalano, Smith, Snyder, and Rand, 2009). As Truman and Mustaine (2009) argue, stalking is not an unusual problem for college students, thus it "remains important for college and university officials to develop strategies to help students prevent, or effectively respond to and end the stalking they are experiencing, as well as counsel those who stalk" (p. 72).

However, research also indicates that the different forms of GBV are interrelated (Cornelius & Resseguie, 2007) and thus policies and programs reflect the need to address multiple indicators of violence (Krebs, et al., 2009; Noonan & Charles, 2009). Additionally, in the last few decades, GBV prevention has shifted away from the victim-perpetrator binary toward a conceptualization of collective ownership and accountability (Welsh, 2008). For instance, Stoltenberg (1997) found that a student organization at Duke University called Men Acting for Change consisted of males that not only acknowledge that gender based violence is a social problem that needs to be eradicated, but also protest being labeled as potential perpetrators and acknowledge men's victimization as well. As such, more programs are addressing GBV prevention from a bystander intervention perspective. For instance, the Mentors in Violence

Prevention program began as a way to engage men in the issue of violence prevention, without targeting them as potential rapists and abusers (Katz, Heisterkamp, & Fleming, 2011).

Recently, bystander models have even shifted toward a gender neutral perspective that men and women can both be offenders, and provides techniques for any "friend, family member, classmate, teammate, coworker – anyone who has a social, family, school, or workplace relationship with a man, woman, boy, or girl who might be harassing, abusive, or violent, or experiencing harassment, abuse, or violence" (Katz, et al., 2011, p. 686) to address, interrupt, or prevent abusive behaviors of others. As of late, bystander empowerment approaches have become more common (e.g.: Potter, Moynihan, Stapleton, & Banyard, 2009; Langhinrichsen-Rohling, Foubert, Brasfield, Hill, & Shelley-Tremblay, 2011; McMahon & Dick, 2011); however, evaluations of these models are still in their infancy, and remain difficult to distinguish if changes in attitudes and behaviors will remain in effect over the long term.

In short, preventing gender based violence requires an "intricate interplay of contributing factors" (Graffunder, et al., 2011, p.210). Current literature argues that, in order to adequately prevent gender based violence, more comprehensive solutions that impact affected individuals as well as families, communities, and several structural and societal sectors are needed in place of inadequate approaches grounded in narrow concepts and poorly established constructs (Cornelius & Resseguie, 2007; DeKeseredy & Schwartz, 2011; Graffunder et al., 2011). Several factors contribute to the effectiveness of prevention strategies while considering who, where, and when the efforts will be targeted, and providing a clear concept of what the desired outcome will be. While prevention techniques often need to be individualized to the needs of a particular community, ecological models that address gender based violence at the

individual, interpersonal, community, and societal level appear to support more comprehensive and effective measures, especially when utilizing primary, secondary, and tertiary techniques (Krug, et al 2002; D'Andrea, 2004; Windle & Mrug, 2008; Graffunder et al., 2011). An example of a set of proposed guidelines, particularly aimed at institutions of higher education is portrayed in the report titled *Beyond Title IX: Guidelines for Preventing and Responding to Gender-based Violence in Higher Education* established by Futures Without Violence (FWV) (Fleck-Henderson, 2012).

#### **Summary of Guidelines of Futures Without Violence**

Futures Without Violence (FWV), formally called Family Violence Prevention Fund, is an organization whose mission entails a worldwide effort to prevent and end violence against women and children. FWV claims to have played an active and influential role in the 1994 passage of the Violence Against Women Act (VAWA) by the US Congress. The organization uses a very comprehensive and ecological approach at tackling gender based violence by working with men and women in various institutions to "transform social norms... train professionals... build sustainable community leadership and educate people everywhere about the importance of respect and healthy relationships" ("About Us," 2012, para. 3).

Currently, colleges and universities are required to comply with state and local laws regarding preventing and responding to violence on campus, including Title IX and the Jeanne Clery Act. Title IX legislation requires schools to respond promptly and effectively to sex discrimination including sexual harassment or sexual misconduct, such as rape, sexual coercion, sexual battery, and sexual assault (U.S. Department of Education) while the Clery Act requires IHEs to disclose information regarding crime on or around their campus in addition to establishing effective emergency response protocols ("Summary of the Jeanne Clery Act," 2012). However, in June 2011, FWV teamed up with the Avon Foundation for Women as a "Campus Advisory Board," working to establish a comprehensive set of guidelines that outline the best way to establish and promote campus cultures of respect and non-violent relationships. As a result of this effort, in addition to the legal developments and research reports requiring or encouraging institutions of higher education to revise and reconsider their existing policies on gender based violence, FWV produced the report titled *Beyond Title IX: Guidelines for Preventing and Responding to Gender-based Violence in Higher Education*. This document was established as a tool to help IHEs go above and beyond the requirements that Title IX and the Clery Act policies mandate, with an emphasis on "procedures addressing sexual misconduct, stalking and intimate partner violence" (Fleck-Henderson, 2012, p. 1). As Fleck-Henderson (2012) describes, the goals of the FWV Guidelines are:

- To prevent abusive behaviors insofar as is possible, by engaging faculty, staff and students in promoting healthy relationships
- To ensure that the institution is prepared to respond promptly and effectively to incidents and reports of violence when they do occur
- Ultimately to change campus norms so that community members hold themselves and each other to respectful and non-violent standards of interpersonal behavior. (p. 2)

These goals reflect the argument for an ecological model, as well as a need for primary, secondary, and tertiary prevention programs, as described in current literature.

However, it is important to note that the guidelines proposed by FWV are not intended to serve as a legal policy. Instead, the organization builds on existing laws and provides a supplement for policy makers to consider, while remaining compliant with existing state, local, and federal requirements. The FWV Guidelines encourage the collaboration of the administrative/legal point of view with that of the service/advocacy sector and provide a list of representatives and departments that should be active stakeholders in the establishment of GBV prevention policy in an institution (Fleck-Henderson, 2012). Additionally, the FWV Guidelines provide ten major areas of practice and policy that are crucial for schools to address in the establishment, or revision, of their policy and procedures. Each of the ten sections then consists of a series of questions related to that area of practice, affirmative responses constitute compliance with the proposed policy (for a complete list of the areas of practice and sectioned questions, see APPENDIX A).

The ten areas of practice outlined in this report include: stating a <u>purpose</u> of accountability for respectful and non-violent interpersonal relationships; creating a culture of <u>evidence based prevention</u> efforts that go beyond tracking of incidents and include student experiences; the <u>defining of key terms and language</u> in a way that is clear to students; deciding <u>jurisdiction</u> of policies and addressing challenges associated with limited jurisdiction; establishing a separate workplace policy to address the needs of <u>faculty and staff</u>, as well as the varying relationships that they encounter; the encouragement of anonymous and confidential <u>reporting and disclosure</u>; offering a <u>formal grievance process</u> should a student pursue a formal complaint; offering a <u>voluntary, informal grievance process</u> for those who do not wish to take formal action; providing <u>administrative accommodations</u> for those affected, including the availability of a trustworthy advocate; and providing easy access to on and off campus medical, psychological, moral/spiritual, and legal <u>resources for those affected</u> (Fleck-Henderson, 2012).

#### FWV Guidelines Relation to Existing Research

The work of Futures Without Violence and Avon Foundation for Women as the Campus Advisory Board is very closely linked to the recommendations and findings in existing literature. This is greatly in part to the extensive research and collaboration of multiple organizations and academics in the creation of this set of guidelines. As stated earlier, FWV was an integral part in the 1994 enactment of the Violence Against Women Act. Additionally, the organization has been working in the area of violence prevention for over thirty years ("About Us," 2012). The Campus Advisory Board also utilized the work and input of other experts in this area of research and practice, including, but not limited to: the Higher Education Center for Alcohol, Drug Abuse, and Violence Prevention; Students Active for Ending Rape; the National Center for Higher Education Risk Management; and Harvard Law School.

In fact, Title IX, the federal legislation intended to protect students from discrimination provides protection from sexual harassment and sexual assault; however, it does not include domestic violence or stalking safeties ("Features," 2012). Therefore, the FWV Guidelines go above and beyond federal requirements to represent a more inclusive approach at targeting gender based violence. However, it is important to note that although prevention of violence against women and children is explicitly stated in FWV's mission, the guidelines do include provisions that state the need to provide assistance for male victimization (APPENDIX A: 10d), as well as the use of gender neutral terminology while not ignoring the fact that the majority of offenders are often males (APPENDIX A: 10h) (Black et al., 2011).

The review of current literature above makes many additional references to the closeness of existing research and the FWV Guidelines. Following are a few additional examples

of specific questions that relate to existing literature. For instance, corresponding with the work of Keller and Otjen (2007), the FWV Guidelines recommend an interdisciplinary approach at GBV prevention, as well as the utilization of social media marketing (see APPENDIX A: 2h). The guidelines also recommend that alcohol and substance abuse programs should work closely with violence prevention (Armstrong, et al., 2006) (APPENDIX A: 2e, 10c) and encourage amnesty (APPENDIX A: 6a (iv)) for these offenses when reporting GBV. There are also multiple examples in the FWV guidelines that emphasize bystander intervention and peer support (APPENDIX A:2i, 2k, 10h) corresponding with a growing body of literature suggesting the potential effectiveness of this technique (e.g.: Potter, et al., 2009; Katz, et al., 2011; Langhinrichsen-Rohling, et al., 2011; McMahon & Dick, 2011).

In consideration that the FWV Guidelines do not intend to act as a legal document, but rather to supplement and exceed existing legal regulations, questions remain as to the how close policies in practice correspond with the guidelines outlined in this recommendation report. Thus, the current examination attempts to provide an analysis comparing the existing policies and procedures of large, public universities in the state of Florida to the proposal of the FWV Guidelines. This study will include an examination of ten of Florida's public universities to provide an analysis comparing the approach of FWV to the policies and procedures of IHEs in Florida, as well as the availability and advertisement of prevention information services at the primary, secondary, and tertiary levels.

#### CHAPTER THREE: METHODOLOGY AND DATA

The current research serves as a comparison between the FWV Guidelines and the extent to which institutions of higher education in Florida utilize these suggestions in practice. Considering that FWV Guidelines do not intend to supersede legal regulations or institutional policies, it is not expected that university policies changed since Futures Without Violence have published their set of guidelines and recommendations, nor is it expected that universities are necessarily eager to modify or establish policies in correspondence with this particular set of guidelines. However, as argued above, the FWV Guidelines consist of a comprehensive set of recommendations, closely tied to existing literature in gender based violence prevention. Thus, the current examination intends to serve as a mutual analysis, comparing university practices and policies to the set of guidelines provided by a third party, as well as allowing for future research to question the feasibility of these guidelines in practice.

The primary goal of the current research is to evaluate the formal and informal policies and practices of a sample of institutions of higher education in Florida in comparison to the guidelines outlined by Futures Without Violence (See APPENDIX B for Coding Sheet). A secondary goal includes determining the extent to which this information is accessible on official university webpages. The secondary analysis is an important factor to consider as it provides an explanation of what a student, parent, faculty/staff, or other interested party may encounter while seeking information related to GBV policies on campus. Accessibility is also important to analyze in this examination, as the presence of information is only effective if a competent user is able to find it in a reasonable manner (Stout, Villegas, & Kim, 2001). Additionally, websites often serve as a quick and easy forum to gather information

anonymously about sensitive topics, while reaching a large percentage of a selected population (Isaacson, 2006), thus, if information is difficult to access on university websites, one can infer that even fewer members of a university community will have successful access to the information elsewhere.

Modeling the work of Truman and Mustaine (2009), the methods used for this investigation consist of an exploratory content analysis of a network of webpages affiliated with the official capacity of the universities selected for the sample. The sample includes the ten largest universities in Florida with a population of 10,000 or more. As Truman and Mustaine (2009) argue, schools exceeding this population are more likely than smaller institutions to have their own law enforcement units and victim services agencies, which serve as primary sources for preventing and responding to gender based violence. Additionally, the guidelines proposed by Futures Without Violence attempt to build from, and surpass, the Title IX and Clery Act legislations, requirements that apply to any public or private colleges and universities that receive federal funding (Pollack, 2011). Therefore, the researcher limited the sample to institutions that meet the above population and funding requirements, excluding institutions that primarily offer two-year degree programs. The sample shall include: University of Central Florida, Florida International University, University of Florida, Florida State University, University of South Florida, Florida Atlantic University, Nova Southeastern University, University of North Florida, University of Miami, and Florida Agricultural and Mechanical University. Detailed characteristics of these universities can be seen in Table 1 below.

|  | Student    | Public / | Police        | Victim        | 4-Year<br>and<br>Advanced |
|--|------------|----------|---------------|---------------|---------------------------|
| University   | Population | Private  | Department?   | Services?     | Degrees?                  |
| University of Central Florida (UCF)  | 59,785     | Public   | Yes           | Yes           | Yes                       |
| Florida International University (FIU)   | 50,000     | Public   | Yes           | Yes           | Yes                       |
| University of Florida (UF)   | 49,913     | Public   | Yes           | Yes           | Yes                       |
| Florida State University (FSU)   | 41,301     | Public   | Yes           | Yes           | Yes                       |
| University of South Florida (USF)  | 41,000     | Public   | Yes           | Yes           | Yes                       |
| Florida Atlantic University (FAU)  | 29,000*    | Public   | Yes           | Yes           | Yes                       |
| Nova Southeastern University (NSU)   | 28,457**   | Private  | Public Safety | Public Safety | Yes                       |
| University of North Florida (UNF)  | 16,372     | Public   | Yes           | Yes           | Yes                       |
| University of Miami (UM)   | 15,613     | Private  | Yes           | Unclear       | Yes                       |
| Florida Agricultural & Mechanical  |            |          |               |               |                           |
| University (FAMU)  | 11,562*    | Public   | Public Safety | Public Safety | Yes                       |
| Population data from Fall 2012 unless otherwise spec<br>*Fall 2011 Data **2011-2012 Data | ified      |          |               |               |                           |

The content analysis of university websites offers a snapshot of the available online information on gender based violence prevention, as it relates to the questions laid out by the FWV Guidelines. Oftentimes, content analyses of organizational policies and/or webpages utilize specific key words to account for a quantifiable, or frequency based presence in the text (Stout, et al, 2001; Issacson, 2006; Jose & Lee, 2007; Gordon & Berhow, 2009). Therefore, FWV Guideline questions were reviewed, and key terms were selected directly from the verbiage used in the report as a starting point for examination (i.e.: sexual misconduct, stalking, Title IX, bystander, jurisdiction, etc.). The researcher used multiple search measures to determine if applicable information was accessible. First, the researcher located the victim services and/or police department pages as those are common locations for gender based violence policies (Truman and Mustaine, 2009), and read the available information to determine compliance and accessibility. Next, the researcher browsed other generalized subpages including Offices of Student Conduct and Faculty and Staff pages for accessible information. These methods allowed the research to become familiar with the structure of each school's webpages and indicated what information was most widely accessible for an interested party. Additionally, designated key terms were entered into onsite search bars from the selected university's main and subpages (a detailed list of key terms for each question is accessible in APPENDIX B) to locate additional information. Lastly, when the above methods were unsuccessful, a search was conducted through Google using the same key terms with the name of the university. Only websites directly with the official capacity of the university were included in the analysis. If all of the above search methods were unsuccessful, the researched coded the corresponding question as limited or not found.

Additionally, it is important to note that the researcher included both explicit verbiage and informal descriptions, including interpreting vague information to denote "Somewhat" or "Implied" compliance with a given FWV Guideline. For instance, a Student Code of Conduct might explicitly outline violations and corresponding formal and informal sanctions; while, on the other hand, a Victim Services Frequently Asked Questions page may vaguely describe services while indicating that specific accommodations would be made on a case-by-case basis. In short, the researcher logged and considered all pertinent information that was accessible and interpretable within a reasonable amount of time, similar to an analysis of stalking policies in Florida universities' webpages (Truman & Mustaine, 2009). Subsequently, the author performed a comparative analysis to ensure consistency in coding techniques across all schools in the sample and inconsistencies were reviewed and corrected at the author's discretion.

## **CHAPTER FOUR: FINDINGS**

#### **Comparative Findings**

Generally speaking, findings of the comparative analysis indicate that the universities

were all or mostly in compliance with approximately half of the questions posed by the FWV

Guidelines, while the other half of the questions were either in need of improvement or not

found (See Table 2).

# TABLE 2: NUMBER OF QUESTIONS IN EACH FWV GUIDELINES CATEGORY INDICATING SIMILARITIES AMONG UNIVERSITIES

|  | All or Mostly in Compliance |                     | Unclear/Needs Improvement |                     | Incomplete/Not Found     |                     | Divided/No Majority |              | Total # of |
|--|-----------------------------|---------------------|---------------------------|---------------------|--------------------------|---------------------|---------------------|--------------|------------|
|  | 10 of 10<br>universities    | 5-9<br>universities | 10 of 10<br>universities  | 5-9<br>universities | 10 of 10<br>universities | 5-9<br>universities | No majority*        | Even split** | Questions  |
| 1: Purpose   | 4                           |                     |                           |                     |                          |                     |                     |              | 4          |
| 2: Prevention  | 2                           | 6                   |                           | 3                   |                          | 4                   | 3                   | <u>/</u>     | 18         |
| 3: Definitions   |                             | 3                   |                           | 2                   |                          | 1                   | 2                   | 5            | 6          |
| 4: Jurisdiction  | 2                           | 4                   |                           | 1                   |                          | 1                   |                     |              | 8          |
| 5: Faculty and Staff   |                             | 2                   |                           | 1                   | -                        | 2                   | 2                   |              | 7          |
| 6: Reporting and<br>Disclosure   | 1                           | 9                   |                           |                     |                          |                     |                     | 7            | 10         |
| 7: Formal Grievance<br>Process   | 2                           | 7                   |                           | 4                   | 1                        | 5                   |                     | 10           | 19         |
| 8: Voluntary Informal<br>Grievance Process   |                             | 3                   |                           |                     |                          | 1                   |                     |              | 4          |
| 9: Administrative<br>Accommodations  |                             | 3                   |                           | 2                   |                          | 1                   |                     | 1            | 7          |
| 10: Resources for<br>those Affected by<br>GBV  |                             | 5                   |                           | 2                   |                          | 4                   |                     |              | 11         |
| 21 Kit Constant and a second sec | er of FWV Gui               | delines Questi      | ons:                      |                     |                          |                     |                     |              | 94         |

\* Less than 5 schools in each category of compliance | \*\* 5 universities Unclear/Needs Improvement, 5 Incomplete/Not Found

Table 2 lists the number of questions in the ten categories of the FWV Guidelines where all or most of the universities shared a similar level of compliance with the recommendations of Futures Without Violence. First, section one, related to stating a purpose of respectful and nonviolent standards of behavior, including outlining mission statements, was the only section where ten out of ten of the universities complied with all of the questions posed (Table 2: 1). Section six was the second most consistent, with at least a majority of the schools in compliance with all of the questions regarding encouraging simple, effective, and confidential reporting and disclosure of violence (Table 2: 6). Similarly, a majority of the universities in the sample complied with 75% of the recommendations related to describing the jurisdiction of the policy (Table 2: 4) and the promotion of informal grievance processes (Table 2: 8). However, limited conclusions can be made about categorical strengths and weaknesses, due to the wide variation of compliance outside of these four categories. Instead, looking at specific questions in multiple categories led to more generalizable conclusions.

#### Majority All or Mostly In Compliance

There were many occasions where all or most of the universities provided clear, accessible information regarding gender based violence specific resources, such as a sexual battery policy, a victim services unit, and an after-hours emergency contact. For instance, eight out of ten universities specifically and clearly described contact information for after-hours emergencies, including a crisis hotline (APPENDIX A: 10g). The presentation of this information varied from a direct contact number through victim advocacy (i.e.: UCF) to a call back service through the police department (i.e.: FSU). The two schools that were limited or unclear either failed to advertise their crime victim helpline as a 24-hour service (USF) or failed to address all forms of gender-based violence by limiting their helpline to a service for sexual assault, while indicating a separate service for generalized crime reporting (UM).

However, oftentimes, when a majority of the schools complied with a given aspect of the guidelines, the compliance was often not specific to gender based violence, focusing on structural and formal aspects of university policy. For instance, all schools outlined a general mission statement to form the framework of university practices (APPENDIX A: 1a), however, these often implied a relationship to GBV, as policies or missions rarely addressed this issue directly. Similarly, policies often addressed GBV concerns under the blanket term "personal safety" and frequently favored a particular portion of the population or campus area. For instance, verbiage often paid specific attention to undergraduates even when a policy also applied to graduate students and employees, and an emphasis was often placed on personal safety in, and traveling to, campus housing.

Next, when policies addressed gender based violence directly, accommodations often applied specifically to sexual harassment and sexual misconduct, excluding other forms of violence. For instance, conduct codes often described procedures for reporting instances of violence and the formal and informal grievance processes in relation to a variety of violations ranging from theft to illicit drug use, while also explicitly naming sexual misconduct and sexual harassment jointly or separately. Additionally, while university policies often stated that retaliation for filing or participating in grievances was unacceptable (APPENDIX A: 5e), these often specifically related to anti-discrimination or sexual harassment policies, indicating that retaliation policies are mostly limited to Title IX compliance. For one school (FAMU), discussion of retaliation was only located in a university anti-hazing policy. Thus, while it may be implied that the same processes relate to reporting all forms of gender based violence, there was often limited information addressing these issues entirely and specifically.

#### Majority Limited or Unclear

Diverging from full or partial compliance, there were 13 instances in which half or more of the universities were unclear in their conformity to the FWV guidelines and recommendations. Universities consistently had limited accessible information related to issues involving faculty and employee relations and training, as well as grievance and accommodation processes. For instance, the FWV Guidelines inquire about the extent that faculty, housing staff, and those responsible for investigating offenses (APPENDIX A: 2m, 7f, 10i) receive GBV related training. The information that the researcher could access online was often limited to statements that all employees are required to complete sexual harassment training, implying that these employees are at least somewhat trained on one aspect of gender-based violence. Additionally, universities often described their housing staff as trained to handle emergencies and crises (i.e.: FSU), and several of the websites contained resource guides for faculty and staff regarding 'troubled students' (i.e.: USF's Student of Concern Assistance Team). However, many of these resource guides often emphasize suicidal, depressed, or disruptive students and encourage staff to refer these students to the appropriate counseling or advocacy departments.

Similarly, even the departments responsible for investigating student conduct code offenses offer little to no information about their expertise in gender-based violence offenses, with the exception of the University of Florida, which is still generally limited to sexual assault training. Also related to the issue of conduct offenses, universities were often limited in their explanations of sanctions for repeat offenders (APPENDIX A: 7g(i)) as well as the extent to which victims have the right to testify in a separate room from the accused (APPENDIX A: 7e(i)),

as these policies frequently leave room for case by case discretion. Similarly, the universities often limited their discussion of offenses that occur between students and university employees (APPENDIX A: 5b) to the risk that consensual relationships pose for future issues of sexual harassment.

#### Majority Incomplete/Not Found

Areas of the FWV Guidelines that were consistently incomplete or not found among the universities' websites relate similarly to those areas that were unclear or limited. For instance, within multiple sections of the FWV Guidelines, issues arose when attempting to locate information on training for a majority of the universities. The extent to which students, health personnel screening, and campus clergy members (APPENDIX A: 2d, 2o, 10j) received training on gender based violence issues remained incomplete or not found for many of the universities. In fact, health services often limited their online discussion to information about screening for sexually transmitted diseases, and training for students often emphasized alcohol and drug use education and prevention. Similarly, only one school (FSU) advertised an online training service specific to the needs of religious services, yet remained unclear as to the participation in this training among its campus ministries.

Second, a majority of the schools frequently provided little to no information on resources for offenders including peer support for men concerned about their violence (APPENDIX A: 10h), services to help the alleged perpetrator from reoffending (APPENDIX A: 8c), or information on campus members responsible for overseeing perpetrator rehabilitation and evaluations (APPENDIX A: 7g(iv)). Similarly, schools were consistently lacking in relation to mandatory sanctions for GBV offenders. While alcohol and drug policies frequently outlined

mandatory offenses for various offenses, issues of GBV were usually limited to the generalized sanctioning process, all of which allowed for discretion by the hearing officials. The described sanctions, including suspension or expulsion, were referred to as possible outcomes, but never mandatory. In fact, the one instance which ten out of ten schools were completely lacking in comparison to the recommendations of the FWV Guidelines, referred to mandatory and severe sanctioning for multiperpetrator sexual misconduct (APPENDIX A: 7g(ix)).

#### Divided/No Majority

Lastly, while most of the universities in the sample were often consistently in or out of compliance with the recommendations of the FWV Guidelines, there were a few questions throughout multiple sections where universities were fairly evenly divided. These questions included varying protocols for academic accommodations, such as students' ability to make up academic work or receive financial or work accommodations (APPENDIX A: 5f, 9f). Similarly, schools were divided on the availability of prevention coordination and education programs (APPENDIX A: 2a, 2i, 2f), as well as the clarity of policy language (APPENDIX A: 3d, 3e, 5c). These inconsistencies may be better understood by examining each university's profile individually. The following sections will describe the particular strengths and weaknesses of each university, aside from the sections and questions discussed above.

#### University of Central Florida

University of Central Florida's (UCF) complied with sections related to stating a purpose of respectful and non-violent interpersonal behavior (APPENDIX B: 1) and describing voluntary informal grievance processes (APPENDIX B: 8) more consistently than other sections. This

information was found in multiple locations and often implied relation to gender-based violence in formal policies, while providing more explicit information in less formal areas. For instance, the Campus Violence Prevention Resource document and Student Conduct Code refer to the safety of all UCF community members while addressing multiple types of threats against the community, including GBV. On the other hand, the Victim Services FAQ and Home page provide clear information regarding advocate assistance without filing a formal grievance, as well as the applicability of their services to all members of the community and links to offcampus services.

The combination of formal and informal resources for members of the UCF community appears to be one of the school's greatest strengths. Not only does the university have a Victim Services department separate from police or counseling services, but there are also multiple student-led resources and bystander based education services through the Wellness Center and Department of Emergency Management. For instance, UCF has a designated violence prevention coordinator (APPENDIX A: 2a), provides bystander education through the Mentors in Violence Prevention (MVP) program (APPENDIX A: 2i), and appears to be the only university in the sample that explicitly outlines mandatory training for students related to bystander and consent based sexual misconduct prevention (APPENDIX A: 2d). Additionally, the Department of Emergency Management provides an online document outlining standards and procedures for campus violence prevention. While this document focuses on a variety of forms of violence that may affect the community, many issues related to gender-based violence are included. The department also has a "for students, by students" online service called KnightSHARE which includes podcasts and information related to sexual violence, relationship violence, and stalking which outlines facts, prevention strategies, risk factors, and contact information for additional services (i.e.: APPENDIX A: 3a, 7c, 10b).

However, even these services are not without flaws. The Campus Violence Prevention Resource Document, for example, provides links to services yet the document itself is not easily accessible through a "quick link" on the main page (APPENDIX A: 10e). In addition, several of the links related to gender-based violence are broken links or route to general webpages that require additional searching for pertinent information, such as the Office of Rights and Responsibilities. Additionally, information related to university employees were frequently limited or not found. The section that includes faculty and staff relations (APPENDIX B: 5) was particularly lacking, as there was no specific information that addressed violence that occurred between employees and students, or providing clear guidance for students alleging grievances against faculty or staff. GBV related training and reporting options for campus professionals also appears limited (APPENDIX A: 2m, 2o, 6b(i), 7f, 10i, 10j) as information often emphasizes referrals to victim advocacy, dealing with disruptive students, or crisis management training with no clear indication of how a gender based violence issue could require an approach distinct from other forms of disruptions or conflicts.

#### **Florida International University**

Similar to the University of Central Florida, Florida International University's (FIU) most comprehensive compliance with the FWV Guidelines related to stating a purpose of respectful and non-violent interpersonal behavior. Additionally, the policies frequently encouraged simple and effective reporting with an emphasis on anonymity and confidentiality, as addressed in section six of the FWV Guidelines. Interestingly, FIU appeared to be the only school in the sample that had a comprehensive and distinct policy addressing sexual offenses, relationship violence, and stalking, outlining victim's rights, reporting options, and definitions (APPENDIX A: 3a-c, 6a, 8a), while addressing various forms of GBV both jointly and separately (APPENDIX A: 1b), including a distinction for technology-based stalking (APPENDIX A: 3a).

Information found among FIU webpages appeared to be much more formal than UCF's resources. For instance, while the comprehensive GBV policy appears to adequately address multiple aspects of the recommendations of Futures Without Violence, it is unclear whether members of the university community would find such a formal resource easily accessible and welcoming when searching for available options on campus. However, the office of Counseling and Psychological Services includes the Victim Advocacy Center, also known as the Victim Empowerment Program (VEP). VEP appears to address some of these formalities through their informational webpage and Frequently Asked Questions, including assistance with administrative accommodations (APPENDIX B: 9) as well as jurisdiction, situational, and community member applicability (APPENDIX A: 1d, 4b,d,e). The VEP website even includes an "escape" button, found on many gender-based violence related websites, to allow for a quick transfer to an alternative site if help-seeking puts an individual at risk of abuse.

However, much like the emphasis on formal policies for information, there appears to be an emphasis on seeking formal assistance from police or advocacy services for support. Limited information is available on peer education through VEP, and other peer support and education services appear to have limited relation to GBV related issues (APPENDIX A: 2i, 2k, 10h). Similarly, information is limited in respect to non VEP-staff and faculty training (APPENDIX

A:2m, 7f, 10i, 10j), health screenings (APPENDIX A: 2o), and the use of drug and alcohol programming to address gender-based violence concerns in the campus community (APPENDIX A: 2e, 10c).

#### **University of Florida**

Similar to Florida International University, the University of Florida (UFL) places a major emphasis on various formal policies for distributing information. Coincidentally, UFL's most comprehensively available information also relates to policy purpose and reporting procedures (APPENDIX B: 1, 6). This policy driven approach includes clear definitions of types of genderbased violence and key words, such as an unambiguous definition of consent for sexual activity (APPENDIX A: a-d). However, as discussed above, informal resources should supplement the formal policies as a more inviting and accessible tool for members of the university community. While the Victims Advocacy unit exists as a portion of the university police department, UFL's Counseling & Wellness Center provides additional useful information in an informal way, separately targeting students, employees, and families. Within this site, there is also a program called GatorWell that appears to target students for health and wellness related issues, including Sexual Trauma/Interpersonal Violence Education (STRIVE).

However, STRIVE appeared to have limited advertisement on the GatorWell page. Gender based violence was not included in the "Topic Areas" section of the site, and one must select the STRIVE link from the "Programs & Services" dropdown menu in order to find that the service relates to GBV. Additionally, STRIVE includes prevention measures, such as student-led peer education with an emphasis on a bystander approach (APPENDIX A: 2i, 2j), however,

additional UFL resources frequently denoted a need for personal responsibility and accountability in preventing crimes. For instance, the UFL Annual Security and Fire Safety Report (2012) states, "special emphasis is placed on personal safety and every student, staff, faculty member, or visitor is encouraged to take a responsible and proactive approach to their own personal safety and security" (p. 19). While this may be efficient in encouraging a safe and crime-free environment, it may also have the effect of a victim-blaming approach that holds victims accountable for the gender based violence that happens to them.

Similarly, UFL appears to emphasize formal processes including administrative hearings, as well as the need to contact officials for assistance. For instance, according to the victim services section (6C1-4.051) of the University Regulations (2008), cases involving sexual assault require the recommendation of a licensed mental health care provider to allow the alleged victim to provide testimony in a separate room from the alleged offender (APPENDIX A: 7e(i)). Additionally interesting is the fact that the university's law school hosts an Intimate Partner Violence Assistance Clinic (IPVAC), which provides "legal representation, mental health counseling, and case management needs" (2012, para. 2) for victims and survivors in the community. However, despite these services being available, it is unclear as to the extent to which services are advertised and available for students, as opposed to members of the community outside of the university, aside from IPVAC's training for health professionals in the college of medicine.

#### Florida State University

Florida State University's (FSU) areas with the most comprehensive compliance closely reflect those of the schools previously examined. Much like the University of Central Florida, FSU provides the clearest compliance with sections one and eight of the FWV Guidelines stating a purpose of non-violent standards and describing voluntary informal grievance processes. However, FSU also has some unique strengths in addressing gender based violence among members of the university community. For instance, Florida State University is the only school in the sample that addresses the FWV recommendation for a GPS tracking system for students' cell phones (APPENDIX A: 10k). FSU Guardian is advertised through the campus police department as an efficient way for FSUPD dispatchers to identify the location of an individual calling from a cell phone registered through the service ("FSU Guardian," n.d.). Students can also create personal profiles to allow FSUPD access to descriptive information that may be critical in an emergency. Additionally, FSU Guardian includes a timer service, which will notify the police department if an individual does not reach their destination in a predetermined amount of time.

FSU's policies and resources also include additional strengths related to student-led support for bystanders and males. For example, the University Counseling Center's service, Realizing Everyone's Need for Emotional Wellness (RENEW) is a peer education program that includes services related to "healthy relationships" although this program only implies a relation to gender based violence needs, and specifically targets undergraduates. Additionally, Men Advocating Responsible Conduct (MARC) partners with the university's Victim Advocate Program to provide peer education, advocacy, and training for men with a genuine interest in

addressing issues of gender equality, gender violence, sexism, and sexual assault on college campuses. MARC is a particularly unique program as FSU appears to be the only school in the sample that clearly complies with the FWV recommendation for peer support for men concerned about their violence (APPENDIX A: 10h). Similarly, the College of Social Work established an online training program for clergy members, which takes a biblical perspective to involve religious organizations in effectively responding to reports of gender-based violence. However, it is unclear whether this tool is utilized by campus ministries or if it is more useful for agencies outside of the university community, if at all.

In contrast, the areas where FSU falls short of the recommendations of Futures Without Violence reflect the issues found in several other universities in the sample, such as mandatory sanctioning for GBV offenses (APPENDIX A: 7g(i, iv-ix)) and employee training and accommodations (APPENDIX A: 2m, 2o, 5g, 7f, 9c). There also appears to be limited information in the Student Conduct Code and Victim Advocacy Program regarding stalking, including technology based stalking (APPENDIX A: 3a). Additionally, despite the numerous resources available related to gender based violence, such as the College of Social Work's Institute for Family Violence Studies, Dean of Students' Victim Advocate Program, and FSUPD, there does not appear to be an adequately advertised prevention coordinator with expertise in the area of gender based violence (APPENDIX A: 2a). However, despite these limited shortcomings, other universities would greatly benefit from modeling several of the features currently unique to this institution.

#### **University of South Florida**

The information available for the University of South Florida (USF) generally reflects the patterns of the collective sample, as many of the areas in compliance with, or deviating from, the recommendations of Futures Without Violence mirror the generalized findings among all of the universities. However, some of the most effective and comprehensive resources for responding to or preventing gender based violence are found in the Center for Victim Advocacy & Violence Prevention (VAVP) website, a division of Student Affairs. To start, USF provides information about an advocate's role, including clear assistance with academic accommodations (APPENDIX A: 5f, 9b, 9g) including individualized safety planning and making arrangements with professors regarding assignments, missed classes, or other requirements ("What is an Advocate" 2013).

Similarly, VAVP addresses several questions in the FWV Guidelines section regarding prevention and promotion of healthy relationships, including peer education and awareness campaigns to prevent sexual and relationship violence. Relationship Equality and Anti-violence League (REAL) appears to play an active role in hosting awareness events, utilizing social media, and involving men and women as active bystanders (APPENDIX A: 2g-k). However, information on REAL is limited to a short description on the VAVP homepage, with a link to the program's interactive Facebook page. The VAVP webpage also provides links to a number of external websites related to gender based violence, healthy relationships, and resources ranging from the local community to a national scale. This approach may provide members of the university community with valuable information and assistance in an efficient way, but it may also

overload individuals with data that may or may not provide useful information pertinent to their situation.

University of South Florida also provides information that is sensitive to power differences' role in abuse (APPENDIX A: 5c) although this information is generally limited to consensual relationships as a risk for future sexual harassment claims, or the role of power in the various forms of sexual harassment. However, this information is generally limited to faculty policies thus limiting the guidance provided to students alleging claims against faculty or staff (APPENDIX A: 5d). Similarly, USF resources are particularly limited in four areas that are otherwise available for a majority of universities in the sample. First, there is no clear indication of types of resources available for individuals outside of the university community that are victimized on campus or by a USF student or staff member (APPENDIX A: 4e). Second, while the university offers safety measures such as nightly escorts and emergency call boxes, limited information is available regarding acknowledgement that most instances of GBV are perpetrated by someone known to the victim (APPENDIX A: 2r). Additionally, available policies do not clearly address a reporter's right for amnesty regarding unrelated offenses (APPENDIX A: 6a(iv)) or a clear indication that retaliation for reporting will not be tolerated (APPENDIX A: 5e). Lastly, and possibly the most surprising limitation found, is the unclear guidance for afterhours emergencies. VAVP advertises the availability of an afterhours, on call victim advocate through the police department in relation to "violent crimes" while providing an additional phone number for a Crime Victim Helpline. However, there is limited information addressing either source as a 24/7 hotline (APPENDIX A: 10g) especially if a victim or concerned member of the community does not identify an incident as a "violent crime".

#### Florida Atlantic University

Florida Atlantic University (FAU) also appears to reflect the general patterns of the overall sample. Additionally, some of the school's greatest strengths exist through Victim Services, a program offered through the university police department (FAUPD). For example, the various capabilities of Victim Services include compliance with FWV recommendations regarding offering assistance to both students and employees, assurance of confidentiality, and assistance with the range of grievance processes available (APPENDIX A: 1d, 6c, 8a). Similarly, the Victim Services webpage provides several links for additional information, with one in particular leading to information addressing specific concerns. The Specific Concerns and Crimes page (2012) separately addresses various forms of gender-based violence including facts, safety planning, definitions, and courses of action for individuals affected by these crimes (APPENDIX A: 10a, 10b). Unlike the University of South Florida, which provides links to external resources, all information is simplified and available directly through the FAUPD webpage.

FAU also addresses gender –based violence through the Student Code of Conduct. Unlike most of the universities in the sample, the FAU Student Code of Conduct lists "violence or threat of violence... including physical or sexual assault and relationship/domestic violence" (2012) first, among the violations that may be subject to disciplinary action. In contrast, however, listing types of gender-based violence as possible conduct violations appears to be the extent to which these issues are explicitly addressed in the conduct code. Similar to the rest of the universities in the sample, FAU does not describe mandatory sanctions for perpetrators of GBV (APPENDIX A: 7g(i-ix)). However, the university does outline specific, mandatory sanctions for violations of the alcohol and drug policy. This university, and others, may benefit

from taking a similar approach in order to clearly describe gender based violence as unacceptable in the campus community (APPENDIX A: 3b).

Additionally, FAU policies could benefit from improvement in several areas. For instance, much like many other universities in the sample, Florida Atlantic University provides limited information on "hot spots" on campus which create particular risks for violence (APPENDIX A: 2l). However, FAUPD does include a crime mapping resource as well as tips for personal safety, with an emphasis on theft and stranger violence. Similarly, the police department's Victim Services page does not clearly explain the types of accommodations available to victims/survivors outside of a generalized statement that assistance and services are available based on individual needs. FAU may benefit from a more detailed explanation of these possible accommodations, as it may encourage more individuals to seek assistance. Lastly, FAU is greatly limited in peer support as there is no available information on peer education or bystander intervention (APPENDIX A: 2i, 2k, 10h) specific to issues of gender based violence.

#### Nova Southeastern University

Nova Southeastern University (NSU) is one of the two private universities that met the requirements for inclusion in the sample. NSU is also unique in the sense that most schools have a fairly even gender composition in the student population. However, NSU's student population consists of approximately 72% females (see APPENDIX C-7). Coincidentally, NSU is also lacking in several key areas of the recommendations and guidelines of Futures Without Violence, which may correlate to the unique needs of a majority-female population, or may

indicate an even greater need for improved attention to gender-based violence. For instance, Nova Southeastern University provides limited explanation of the various reporting options available for instances of gender-based violence (APPENDIX A: 6a). The Public Safety Department, Student Handbook, and Campus Safety Handbook limit reporting information to contacting police or seeking medical attention and policies almost exclusively limit these options to sexual misconduct. Additionally, information appears limited on providing amnesty for unrelated violations (APPENDIX A: 6a(iv)), protecting reporters from retaliation (APPENDIX A: 5e), and ensuring confidentiality, including access to advocates unaffiliated with an office of notice (APPENDIX A: 6a(iii), 6b(ii),6d, 7d).

Much like Florida Atlantic University, pages of the NSU website also failed to provide clear information regarding the availability of bystander intervention or peer education programs to aid in the prevention and response to gender based violence. NSU also places a major emphasis on perpetration of crimes by strangers, as opposed to someone known to the victim. These two limitations may contribute to difficulties in a victim's ability to identify partner abuse as a crime (Karjane et al, 2002) and for bystanders to understand the importance of everyone's role in preventing gender-based violence (Potter et al, 2009). Lastly, online access to the Faculty Handbook required the use of an employee ID and password, thus limiting the researcher's access to information regarding the extent of training for employees as well as the encouragement and promotion of healthy relationships in the classroom (APPENDIX A: 2n).

In contrast to limitations suggesting that Nova Southeastern University fails to address issues of gender-based violence in the community, two major services stand out as possible useful resources for those concerned with violence in the community. First, the Office of

Suicide and Violence Prevention has the potential to play a large role in addressing these issues. However, available information for this resource suggests a major emphasis on suicide prevention over other forms of violence, including awareness activities, training, and events. Secondly, NSU's Family Violence Program (FVP) is named as a psychological health care service offering "therapeutic interventions for issues involving all aspects of domestic violence" (Family Violence Program, 2011, para. 1). Yet, while this service appears to address violence to assist both victims and perpetrators (APPENDIX A: 10a), while also providing clear behavioral definitions of types of violence (APPENDIX A: 3a), FVP is also a fee-for-service program. Similarly, there is no clear indication if the services are advertised to members of the university community, or if sanctions for student conduct violations include the use of FVP's rehabilitative services (APPENDIX A: 8c).

# **University of North Florida**

While universities offer victim advocacy services as subsections of various different departments, the University of North Florida (UNF) is unique in this sample as it is the only university whose program is offered through the Women's Center. This may increase some community members' willingness to seek assistance, as the service may appear less formal than if it were a division of the police department; however, it may also discourage other members of the community, including male victims (APPENDIX A: 10d). Similarly, faculty and staff may also be discouraged from seeking help through this program, as the Women's Center is a division of Student Affairs. Fortunately, many faculty and staff do have access to additional support through the Florida Statute addressing Domestic Violence Leave and the Employee

Assistance Program although, much like other schools in the sample, information addressing relations between community members of different institutional statuses (APPENDIX A: 5b-d) appears limited.

Employee policies also include mandatory Crisis Management Training through the Center for Professional Development & Training (CPTD). While this training appears to address various forms of violent behavior, the extent to which staff members are trained to respond to gender-based violence in particular remains unclear (APPENDIX A: 2m, 7f, 10i, 10j). CPTD also offers online training specifically addressing domestic violence, although this training appears to address understanding domestic violence on a national scale, and participation in the training does not appear mandatory for any member of the community. Unlike the clear, albeit limited, training available for employees, there does not appear to be any mandatory training requirements for students regarding issues of gender based violence (APPENDIX A: 2d). Despite this, UNF appears to effectively address at least one type of GBV, such as the Women's Center's annual awareness events (APPENDIX A: 2g) and the academic and housing accommodations provided by victim advocates for victims/survivors of sexual assault (APPENDIX A: 9a, 9b).

There also appears to be additional resources in the university that provide unclear or implied support for gender-based violence, while possessing the potential to improve or expand these services. For example, parents are encouraged to discuss issues of safety and personal conduct with their student (APPENDIX A: 2k), including diversity and sexuality, although the need to discuss GBV should be made more clear. Similarly, the Bette Soldewedel Research Initiative offered through the Women's Center supports research projects related to matters of gender, which implies the encouragement of research related to gendered violence

in the community (APPENDIX A: 2p). The Counseling Center also staffs an outreach coordinator with expertise in crisis intervention and domestic violence (APPENDIX A: 2a), although there was limited information on bystander intervention and peer education services. For instance, advertisement of the LIFE Peer Education Team appears particularly limited to encouragement of healthy relationships with no clear indication of the program's impact in the university community or the discussion of GBV. Lastly, the Wellness Center acknowledges violence prevention as essential to maintaining a healthy environment, yet there does not appear to be any additional information on services offered in support of this claim ("Healthy Osprey," 2012).

#### **University of Miami**

Similar to UNF, the University of Miami (UM) provides a foundation for programs and policies addressing gender-based violence prevention and response, yet these systems require improvements to approach these issues more comprehensively and directly. For instance, UM encompasses a wellness center, peer education and support groups, and safety tips; however, these services often focus on other types of concerns with limited attention to the various forms of gender-based violence. First, the wellness center itself tends to limit its focus to recreation and physical fitness, whereas other schools (i.e.: University of Central Florida, University of Florida) also approach wellness and health promotion with a variety of techniques to encourage more comprehensive healthy lifestyles. Peer education and support groups also emphasize more generalized issues, such as the Counseling Outreach Peer Education (COPE) program. COPE includes a campaign for 'healthy relationships' and provides information

regarding services offered through the Counseling Center, but these generalized descriptions do not explicitly describe services related to various forms of gender-based violence.

When the University of Miami addresses gender-based violence, particular attention is placed on sexual misconduct with limited acknowledgement of other forms of abuse. However, even this limited perspective is flawed as policies do not clearly address the varying needs of victims/survivors of sexual misconduct. First, available information on establishing consent is greatly limited (APPENDIX A: 3c, 3d). The 2012-2013 Student Rights and Responsibilities Handbook – Student Code of Conduct (SRR-SCC) defines consent as "intelligent, knowing, and voluntary consent and shall not be construed to include coerced submission" (p. 50). Additionally, an individual may be "incapable of giving consent due to the use of drugs or alcohol... also... due to an intellectual or other disability" (p. 101). While these points are truly important to note, this does not constitute the unambiguous definition that is critical to a comprehensive GBV policy, as outlined by the FWV Guidelines. Similarly, the SRR-SCC states that faculty, staff, and administrators are mandated to report sexual assault, and thus cannot guarantee anonymity (APPENDIX A: 6b, 6b(ii)), which may discourage the reporting of abuse. When confidentiality is available, it is also limited to services offered by the Ombudsperson, including making objective recommendations and investigating policy fairness. The ombudsperson does not offer advocacy or representation, and does not assist members of the community other than students or regarding non-university related problems (APPENDIX A: 1d, 4b, 4e, 6d). There also appears to be no mention of assistance available to visitors assaulted by students, or various types of grievances outside of the student conduct process. Lastly, it also

appears that afterhours emergency contacts are limited to a sexual assault hotline or generalized crime reporting through the police department.

In contrast, however, the University of Miami is among the minority of schools in the sample that clearly address the various power differences involved in GBV. In particular, the office of Equal Opportunity/Affirmative Action (EO/AA) describes sexual harassment as a misuse of power which "most often occurs in situations where there is a power relationship" ("Sexual Harassment FAQs", 2013, para. 5) (APPENDIX A: 5c). The SRR-SCC also outlines distinct reporting procedures based on various forms of relationships in the university community, such as student-faculty relations or student-staff relations (APPENDIX A: 5b). The UM Student Conduct Code is also among the minority in this sample that clearly describes an increasing severity of sanctions for repeat offenders, stating that "any policy violation/s beyond the first will receive more serious sanctions, dependent upon the case at hand" (Student Rights and Responsibilities Handbook, 2012, p. 88). However, this still allows room for individualized case discretion, which remains a common theme throughout sanctioning procedures for all universities in this sample.

#### Florida Agricultural & Mechanical University

The last school in the sample has a student population just shy of 12,000, approximately 90% of whom identify as black (APPENDIX C-10). Florida Agricultural & Mechanical University (FAMU) is a historically black university, thus the skewed racial distribution is not unexpected, although it may offer grounds for future discussion of the impact of race in the implementation of gender-based violence policies and procedures. For this particular institution, the greatest

strengths related to GBV issues are found in peer education and support programs, including the use of public education and social media (APPENDIX A: 2h). For instance, a collaboration of Student Health Services and Campus Recreation developed a Wellness initiative in 2012 utilizing a "mind, body, spirit approach to the overall health and wellness of minorities" ("About Rattler Wellness", n.d., para. 1). While this program is only in its infancy, it utilizes peer education groups including Speak Out, Prevent, Educate, Advocate & Know (SPEAK) and Ladies Opposed to Unsafe Sex (LOTUS) which include presentations, awareness events, and helpful tips regarding the prevention and response to domestic and sexual violence. Similarly, Rattler Wellness includes The Phoenix Fellowship, a confidential peer support program for survivors of sexual violence. However, access to information on these programs and others are limited in a sense that Rattler Wellness exists as an external website not directly tied to the official FAMU site. While the official Student Health Services page briefly mentions these programs, the university would benefit from making links to these additional websites more clear.

Similarly, FAMU Counseling has a peer support group for men concerned with issues of gender violence (APPENDIX A: 10a, 10h). However, the official FAMU websites provide limited information about Men of STrength (MOST), with a Facebook page and external website providing the most useful description and contact information. Additionally, participation in MOST is by invitation only, implying that the program may be limited to secondary or tertiary intervention, responding to high risk or previous perpetrators. The Victim Advocate Program is also offered through the Office of Counseling Services. The Counseling center describes their services as "expanding because students seem to appreciate our nonjudgmental and supportive

style" ("Welcome", 2013, para. 1) indicating institutional and student support and attention to these services.

However, counseling and the victim advocacy appear to provide support to students only. In contrast, there is limited information available on issues involving faculty and staff (APPENDIX A: 5a). For instance, while the Faculty Handbook included limited information about unequal power differences as a potential for coercion, no information was available on counseling services, domestic violence leave, or employee assistance programs available in other universities. Similarly, there was no information found in the Student Handbook guiding the reporting process for claims against employees, nor was there any discussion of retaliation outside of the university hazing policy (APPENDIX A: 5b, 5d, 5e). Lastly, the Student Handbook defines many instances of gender-based violence as felony offenses. According to university policy, felonies include sanctions ranging from suspension to expulsion (APPENDIX A: 7g(i)); however, the definitions of GBV offenses are limited, with a particular lack of attention to definitions of consent.

#### CHAPTER FIVE: DISCUSSION/CONCLUSION

Institutions of higher education serve as a valuable link in the use of ecological and interdisciplinary model to encourage the prevention of gender based violence. These institutions can target GBV with criminal justice and public health approaches while providing education to a diverse population during a period of major transition and development. Thus, the goal of the current content analysis was to evaluate how ten of Florida's largest universities' policies compare to the ecological prevention and response guidelines of a third party, Futures Without Violence. As such, several common themes, and some inconsistencies, became clear.

First, most of the information available for each university required extensive research through various portions of the schools' websites. All of the universities in the sample could benefit from a clear and comprehensive resource guide indicating services available and providing links for additional information, much like the University of Central Florida's Campus Violence Prevention Resource Document (2012). While only a small portion of this document addresses gender violence, every school could benefit from modeling its formatting to make GBV policies and resources more accessible to members of the community. Each of the universities could also benefit from utilizing the ever-increasing emphasis on technology to also encourage and implement services accessible from mobile devices, such as GPS tracking, which is currently only available through Florida State University.

Findings also indicate that universities in Florida emphasize responding to issues of sexual misconduct over other forms of gender based violence. This is to be expected as colleges and universities have been directing resources toward the problem of sexual assault for decades (Armstrong, et al, 2006). However, universities should pay more attention to the ways

in which the policies address this issue. For instance, some universities did not provide a clear definition of consent, some placed a greater emphasis on violations by strangers although it is much more common for victims to know their assailant (Black et al., 2011), and not one of the universities addressed the issue of multiperpetrator sexual assault. This may result in issues of limited help seeking or reporting, as well as a lack of sanctioning for offenders. Additionally, when gender violence is reported, universities appear to have a range of formal and informal options to resolve the issue. Many of the schools approach the issue as a violation of a conduct code, while many also have additional, less formal options available to students. However, violations that result in hearings and sanctioning appear to allow for a wide range of discretion of the hearing body, as mandatory sanctioning is greatly limited, as are services related to perpetrator accountability, monitoring, and rehabilitating.

Most schools also fail to address the particular contexts and locations that provide the greatest risks for violence to occur, such as fraternity houses, parties, and bars (Armstrong, et al, 2006). Similarly, several of the universities in the sample have yet to adapt to the growing emphasis on bystander intervention programs. Current literature argues the importance of encouraging collective accountability, engaging both men and women in the prevention of violence (Welsh, 2008; Katz, Heisterkamp, & Fleming, 2011). In contrast, universities are increasingly utilizing social media websites affiliated with campus prevention and support programs. This approach may aid in spreading the word about GBV issues and services, although future research would be required to adequately address the extent and reach of this method.

It is also possible that the universities place a major emphasis on sexual misconduct as sexual harassment and sexual assault are explicitly described as a form of sex discrimination under Title IX legislation, while other forms of violence are not. In short, this indicates that while less formal, peer centered approaches are increasingly present in Florida universities, and some are beginning to explicitly acknowledge that abuse can take many forms, many policies remain limited to formal, federal regulations. Consistent with the recommendations of Futures Without Violence, the universities in this sample should continue to adapt more to the needs of the university community beyond formal regulations, while continuing to utilize and amend these formal policies as part of a steadfast system opposed to all types of gender based violence by, against, or affecting members of the university community.

#### Limitations and Directions for Future Research

The purpose of the current study was to evaluate the comprehensiveness and accessibility of Florida universities' gender based violence policies and resources, as they compare to the guidelines and recommendations of Futures Without Violence, a private organization. Thus, the current research is not without limitations. First, there are multiple limitations to the university website content analysis approach. For instance, there was only one researcher performing the analysis, which leaves room for coding errors and possible subjective interpretations of information. However, this is equally, if not more, possible if the coder was actually a member of the university community in need of assistance from a given university's website. Additionally, some websites may be updated less frequently than others, and it is beyond the scope of the current analysis to determine whether individuals actively

involved with the university receive more updated information through other sources such as printed posters, classroom discussion, or organization tabling and flyers.

Similarly, the researcher attempted to limit searches to websites that address the university at large, rather than resources for a specific regional campus, college, or department within a college. Future research may benefit from evaluating how subsections of the university also address issues of grievances and support, as well as the advertisement of these resources. Future research should also evaluate knowledge of services and training for common points of contact for international students or students with disabilities. It is also beyond the scope of this study to provide a detailed analysis comparing access to comprehensive GBV resources to particular university characteristics (i.e.: racial composition, regional location, additional sources of funding or grants, or current statistics related to reported incidents of GBV).

Lastly, the guidelines and recommendations of Futures Without Violence are not without limitations of their own. First, it is important to note that prevention techniques are often tailored to the needs of an individual community, thus one particular set of guidelines may be limited to address diverse needs. Similarly, the FWV Guidelines are structured into ten sections, each with a separate focus. However, it may be argued that there are several overlaps and inconsistencies within each section. For example, section five separately addresses faculty and staff, yet several other sections include questions regarding support for employees, as well as their training and expertise. Section five also addresses retaliation for reporting, which may be better served in the section specifically addressing effective reporting and disclosure. If the these sections were structured differently, the current research may have reflected more consistent compliance levels for overall sections, rather than for individual questions,

potentially making an analysis more clear. Lastly, the current research does not attempt to evaluate the feasibility of the FWV Guidelines in practice. This study simply argues that FWV serves as a legitimate organization to address gender based violence, and its set of guidelines is a valuable and comprehensive tool that is useful in evaluating the current state of prevention and response policies and procedures in Florida universities. Future research should expand on this research by examining the extent to which the FWV Guidelines are conceivable in practice.

In short, as discussed in Chapter Two, the Campus Advisory Board established by Futures Without Violence attempts to go above and beyond legal requirements to prevent and respond to gender based violence in institutions of higher education. Futures Without Violence utilized existing literature as well as advisors with expertise in violence prevention (Fleck-Henderson, 2012) to create the comprehensive set of guidelines and recommendations described. The findings discussed above represent an analysis of these guidelines and recommendations in practice based on existing policies in ten of the largest universities in Florida. The current study effectively evaluates how a sample of IHEs compares to the recommendations of social research and legal requirements for preventing and responding to gender based violence. Understanding a university's overall and individual strengths and weaknesses may assist the institutions with targeting future policy development.

For instance, existing literature argues that advocacy for proactive prevention techniques and bystander intervention models are increasing. The current research examines whether particular universities have begun moving toward these approaches, and points out the areas in which remain lacking. Similarly, current literature and the FWV Guidelines address stalking and dating/domestic violence, areas that are lacking in legal regulations limited to sex

discrimination and crime disclosers. The current research suggests that several of the universities in the sample should make more progress toward increasing support outside of legal requirements as well as addressing a more broad population of the university community. Lastly, the current research adds to the national conversation about the current state, and future direction, of gender based violence prevention (Fleck-Henderson, 2012). This study not only evaluates the sample's compliance with the FWV Guidelines but also begins the conversation about the feasibility of these guidelines and recommendations in practice. If universities consistently fail to meet certain criteria, future discussions will be needed about the guidelines' achievability at the institutional level.

# APPENDIX A: LIST OF QUESTIONS IN FWV GUIDELINES REPORT

### **1.** Purpose: Respectful and non-violent standards of interpersonal behavior.

a. Do you set forth the general mission statement and goals which will form the framework for the practice and policy details?

b. Do you address sexual misconduct, intimate partner violence and stalking, either in one document or in separate documents?

c. Is it clear that recommendations will be consistent with and supported by the student conduct code and other forms of governance on campus? Is it clear that recommendations will be consistent with legal requirements, e.g., the Clery Act, Title IX and state and local laws?

d. Does the work of this team apply to students only, or to faculty and staff as well? If only to students, is it clear which policies govern faculty and staff?

### 2. Prevention: Culture that resists violence and abuse and promotes healthy relationships for all

a. Is there a designated and adequately supported prevention coordinator on campus? Does the prevention coordinator have expertise in prevention programs and strategies in the area of violence b. Can the college/university demonstrate that at the beginning of the school year it informs all students of their rights and responsibilities regarding sexual misconduct, dating or domestic violence c. Recognizing that an overload of information early in the year often results in very little being retained and understood, is there appropriate follow-up throughout the year?

d. Is there mandatory training for students, online and/or in person, regarding gender-based violence? Is that training sensitive to particular needs of international students and those with disabilities?

e. Do drug and alcohol programs work closely with violence prevention efforts?

f. Are parents informed of institutional policies regarding gender-based violence prior to their child entering the college/university and encouraged to discuss these with their child?

g. Does the college/university host events that encourage awareness of the issues of sexual misconduct, intimate violence, and stalking?

h. Does the college/university have a public education/social media campaign regarding gender-based violence that is informed by campus data as well as evaluation research?

i. Does the college/university offer bystander education, where men and women are taught to take an active role in preventing all forms of violence on campus?

j. Does the college/university encourage and support student-led activities that protest, bring awareness to, or work to reduce the incidence of gender-based violence on campus?

k. Does the college/university support on-campus peer groups with training in the prevention of and response to sexual misconduct, stalking and intimate partner violence?

I. Has the college/university collected data and identified "hot spots" on campus which create particular risks for sexual misconduct or intimate partner violence? Are there targeted efforts to m. Do faculty and staff receive training on responding to incidents of gender-based violence?

n. Are faculty and staff encouraged to promote healthy relationships and community responsibility on campus and in their classrooms, including discouraging sexism and offensive language?

o. Are health personnel trained to screen for intimate partner violence, sexual misconduct and

p. Does the college/university support and fund research on the experience of gender-based violence

q. Does the college/university work to ensure a "culture of respect" that makes it clear that all forms of violence, and gender-based violence in particular, are unacceptable on campus?

(while also recognizing and informing students that most incidents of gender-based violence on campuses are not perpetrated by strangers)?

# 3. Definitions of Key Terms and Language: Clear definitions and statements of prohibited behaviors

a. Does the college/university policy define sexual misconduct, intimate partner violence and stalking in behavioral terms? Does it refer to the use of technology to abuse, humiliate, harass or stalk someone? Does it give specific examples to clarify the definitions? Does it make clear that the listed examples of sexual misconduct, intimate partner violence and stalking are not exhaustive?
b. Does the policy make clear that these behaviors, as well as others that the school may deem inappropriate, are prohibited and may result in disciplinary and/or legal action?
c. Within definitions, are key words defined, e.g., consent, force, incapacitation, physical assault?
d. Does the language make unmistakably clear the need for affirmative consent to any sexual activity?

e. Do students have input into the language used in these policies, to ensure that definitions and explanations are stated in a way that is easy for the general student body to understand?f. Is there a section which gives specific examples to clarify and illustrate the boundaries between what

is prohibited and what is disrespectful, but does not violate law or policy?

### 4. Jurisdiction: Who is covered and where the policies pertain

a. Is it clear who is included as "student," "faculty," "staff" and "contractor"?

b. Is it clear that student survivors have access to campus resources whether or not the alleged perpetrator has an affiliation with the college/university?

c. Is it clear how the policies apply to students who are employed by the college/university, e.g., RAs, TAs, graduate assistants, etc., and to employees who may be taking classes? Is it also clear how the policy applies to those working at the university under a contract or grant?

d. What locations are covered by this policy? Specifically, are violations which occur off-campus covered? If not, is the limit clearly, and broadly, defined, i.e., are off-campus buildings which primarily e. Are offenses against students by persons not related to the institution addressed, as well as offenses committed by students against those who are not students?

f. Does a partnership exist between schools that share close physical proximity? If a student at one school is assaulted by a student at a neighboring school, is there a system in place for these colleges to work together to a fair and just resolution for both/all parties?

g. For any offenses not covered by university policy, is it clear who has jurisdiction (e.g., police)? duty to investigate?

# 5. Faculty and Staff: Separately addressing various forms of relationships

a. Is there a separate workplace policy that addresses gender-based violence involving faculty or staffb. Do the college/university policies on sexual misconduct, intimate partner violence and stalkingaddress the issue of violence that occurs between students and faculty or students and staff?

c. Are these policies sensitive to power differences, e.g., in institutional status, and their role in abuse? d. Does the policy have clear guidance for students who allege sexual misconduct, intimate partner violence or stalking by faculty or staff members?

e. Is it clear that retaliation is not permitted, and the student will not be penalized, academically or otherwise, for reporting the incident/s?

f. Is there protocol for students to make up any academic work they may miss as a result of the g. Is there a protocol for students to transfer jobs or miss work without penalty as a result of an

# 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and confidential.

a. Does the policy include the range of reporting options for those who have experienced gender-basedi. Does it outline how to file a criminal complaint? Does it specify a resource for help with filing a

ii. Does it outline how to file an institutional complaint of violation of this policy? Does it specify a resource for help in filing an institutional complaint?

iii. Does it specify how to file anonymous and confidential reports? Does it specify a resource for help in filing an anonymous and/or confidential report?

iv. Does it indicate that reporters can expect amnesty for unrelated violations, e.g. underage use b. Does it specify clearly who is mandated to report incidents of violence of which they become aware?

i. Does it outline how to file such reports?

ii. Does it include guidelines for dealing with survivor requests for anonymity and or

c. Does it specify with whom in the college/university community one may have confidential communications, i.e. who is not required to report?

for reporting?

# 7. Formal greivances process: Access to and information about pursuing a formal grievance

a. Does the policy address Title IX investigations as an obligation of the institution in response to reported incidents of gender based violence? Does it name the Title IX officer and clarify the possibility for less formal investigations in some cases?

how a student can opt for both, either or neither route? Does it specify the student's role in choosing which processes to participate in?

c. Does it include contact persons who can assist survivors and those accused with the grievance d. Is it clear that the above mentioned contact persons do not work for an "office of notice," but that their role is to help students work through the process?

e. Is the student conduct/grievance process clearly described, including the rights and responsibilities of both accuser and accused?

i. Is it clear that a face-to-face meeting of accuser and accused is not part of the process? Colleague Letter specifies?

iii. Are privacy and notification processes described? Is it clear, as the Dear Colleague Letter

requires, that both accuser and accused have an equal right to notice of the outcome, any f. Have those responsible for investigating or mitigating received specialized training? Does this training include intimate partner violence, sexual misconduct, stalking, workplace, and civil rights? g. Are sanctions that may be imposed for different offenses clearly spelled out?

i. If there are offenses which warrant mandatory sanctions, is that clearly stated?

ii. Are there more serious sanctions for repeat offenders? Is expulsion mandatory?

iii. Are non-expulsion sanctions multifaceted, including punishment, treatment, education, and

iv. Is there an individual on campus who is responsible for each area of rehabilitation? Is there an individual responsible for overseeing the perpetrator's progress and reevaluating the appropriateness of his remaining on campus?

v. Is there a mandatory, more serious punishment should the perpetrator not make progress or refuse to do that which is required of him, such as counseling and training?

vi. Is there a mandatory relocation policy for perpetrators who live near their victims, such as in vii. Do sanctions include the mandatory suspension of athlete perpetrators from their teams? viii. Do sanctions include the mandatory suspension of fraternity member perpetrators from their fraternities and associated parties and events?

ix. Are there more serious mandatory sanctions for those involved in multipleperpetrator sexual

### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file

a. Is it clear in the policy that informal responses are offered in a context of a system that also offers formal grievance procedures, and that the victim's choice remains at the center of the school's
b. Are there named services, both on campus and in the community, which can be utilized to aid survivors in their desire for closure?

c. Are there named services, both on campus and in the community, which can be utilized to help the alleged perpetrator not to reoffend, e.g., counseling services, dedicated men's non-violence groups? d. Are faculty, staff and advocates trained to listen to survivors regarding how they want to approach the grievance process? Are they trained to balance the harms and offer survivor-centered safety

# 9. Administrative Accommodations For Those Affected By Gender-Based Violence: Accommodations and personalized support for survivors

a. Is it possible to provide alternative housing for the accused and/or accusing student to increase

- b. Is it possible to change a survivor's academic schedule to accommodate her/his needs?
- c. Are all professors required to offer academic accommodations to survivors?
- d. Are tutors and academic counselors available?
- e. May a survivor drop a class without penalty if his/her workload becomes too overwhelming?
- f. Are there accommodations in place for students whose ability to afford school is dependent on a work-study job, such as flexibility in work schedule?

g. Are there accommodations in place for students who must maintain a certain GPA for scholarships, such as a semester or yearlong forgiveness period in which her GPA does not count towards

# **10.** Resources For Those Affected By Gender-Based Violence: Easy access to medical, psychological, moral/spiritual, legal help on and off campus

a. Does the policy clearly state where survivors and those accused of abusive behavior or concerned about their behavior may go for help, on and off campus?

b. Does the policy include survivor resources separately and specifically for intimate partner violence, sexual misconduct and stalking, e.g., medical resources for rape, advocacy and safety planning, cyber c. Do drug and alcohol resources work closely with violence response resources?

d. Are survivor resources accessible to and prepared for male victims of intimate partner violence, sexual misconduct and stalking?

e. Is there a "quick-link" on the school's website that accesses the school's policy and resource

f. Are counseling and health services available 24/7?

g. Is there a hotline that students can call 24/7?

h. Are there peer groups on campus with whom survivors can meet to share their stories? Is there peer support for concerned bystanders? Is there peer support for men concerned about their violence?i. Are Residential Advisors, House Masters, and other individuals who are employed by the university, specifically in residence life, required to attend training on sexual misconduct, intimate partner

violence and stalking prevention and response? Is basic safety planning included in their training? j. Do members of the campus clergy attend training on sexual misconduct, intimate partner violence and stalking prevention and response? Is basic safety planning included in their training?

k. Is there an option for a student's cell phone to place emergency calls to campus police and act as a tracking system if such a call is made?

# APPENDIX B: LOGGING AND CODING OF UNIVERSITY POLICIES IN COMPARISON TO FWV GUIDELINES

|   | Key Terms  | Compliance? | Where is info located? | What type of info/context? | Explicit/Implied |
|---|--|-------------|------------------------|----------------------------|------------------|
| 1. Purpose: Respectful and non-violent standards of interpersonal behavior  |  |             |                        |                            |                  |
| a. Do you set forth the general mission statement and goals which will form the framework for the practice and policy details?  | mission statement,<br>mission, creed                           |             |                        |                            |                  |
| b. Do you address sexual misconduct, intimate partner violence and stalking, either in one document or in separate documents?   | policy + sexual<br>misconduct; violence;<br>stalking           |             |                        |                            |                  |
| <ul> <li>c. Is it clear that recommendations will be consistent with and supported by the student conduct code and other forms of governance on campus? Is it clear that recommendations will be consistent with legal requirements, e.g., the Clery Act, Title IX and state and local laws?</li> <li>d. Does the work of this team apply to students only, or to faculty and staff as well? If only</li> </ul> | Clery Act; Title IX; legal;<br>governance<br>student, faculty  |             |                        |                            |                  |
| to students, is it clear which policies govern faculty and staff?<br>2. Prevention: Culture that resists violence and abuse and promotes healthy<br>relationships for all   |  |             |                        |                            |                  |
| <ul> <li>a. Is there a designated and adequately supported prevention coordinator on campus?</li> <li>Does the prevention coordinator have expertise in prevention programs and strategies in<br/>the area of violence against women?</li> </ul>  | Prevention Coordinator   |             |                        |                            |                  |
| b. Can the college/university demonstrate that at the beginning of the school year it<br>informs all students of their rights and responsibilities regarding sexual misconduct, dating<br>or domestic violence and stalking?  | beginning of year,<br>orientation, rights,<br>responsibilities |             |                        |                            |                  |
| c. Recognizing that an overload of information early in the year often results in very little being retained and understood, is there appropriate follow-up throughout the year?  | follow up, rights,<br>responsibilities                         |             |                        |                            |                  |
| d. Is there mandatory training for students, online and/or in person, regarding gender-<br>based violence? Is that training sensitive to particular needs of international students and<br>those with disabilities?   | online ,violence<br>training,module                            |             |                        |                            |                  |
| e. Do drug and alcohol programs work closely with violence <b>prevention</b> efforts?   | alcohol, drugs, prevention                                     |             |                        |                            |                  |
| f. Are parents informed of institutional policies regarding gender-based violence prior to their child entering the college/university and encouraged to discuss these with their child?  | Parents  |             |                        |                            |                  |
| g. Does the college/university host events that encourage awareness of the issues of<br>sexual misconduct, intimate violence, and stalking?   | violence awareness<br>events                                   |             |                        |                            |                  |
| h. Does the college/university have a public education/social media campaign regarding gender-based violence that is informed by campus data as well as evaluation research?  | education, social media, gender violence                       |             |                        |                            |                  |
| i. Does the college/university offer bystander education, where men and women are<br>taught to take an active role in preventing all forms of violence on campus?   | Bystander  |             |                        |                            |                  |

| j. Does the college/university encourage and support student-led activities that protest,<br>bring awareness to, or work to reduce the incidence of gender-based violence on campus?   | protest, student-led,<br>awareness, violence                                       |
|--|--|
| k. Does the college/university support on-campus peer groups with training in the prevention of and response to sexual misconduct, stalking and intimate partner violence?   | prevention, peer groups,<br>violence, training                                     |
| I. Has the college/university collected data and identified "hot spots" on campus which create particular risks for sexual misconduct or intimate partner violence? Are there targeted efforts to address these locations and groups?  | hot spots, risk for<br>violence, dangerous<br>locations                            |
| m. Do faculty and staff receive training on responding to incidents of gender-based violence?  | faculty, staff, training, violence   |
| n. Are faculty and staff encouraged to promote healthy relationships and community responsibility on campus and in their classrooms, including discouraging sexism and offensive language?   | faculty, staff, healthy,<br>responsibility   |
| o. Are health personnel trained to screen for intimate partner violence, sexual misconduct and stalking?   | health, screening  |
| p. Does the college/university support and fund research on the experience of gender-<br>based violence among its students?  | research, funding,<br>campus violence,<br>student violence                         |
| q. Does the college/university work to ensure a "culture of respect" that makes it clear that all forms of violence, and gender-based violence in particular, are unacceptable on campus?  | respect, violence  |
| r. Does the campus offer safety measures such as police escorts, sufficient lighting, call boxes, etc. (while also recognizing and informing students that most incidents of gender-based violence on campuses are not perpetrated by strangers)?  | call box, police escort,<br>campus violence, safety                                |
| 3. Definitions of Key Terms and Language: Clear definitions and statements of prohibited<br>behaviors  |  |
| a. Does the college/university policy define sexual misconduct, intimate partner violence<br>and stalking in behavioral terms? Does it refer to the use of technology to abuse,<br>humiliate, harass or stalk someone? Does it give specific examples to clarify the<br>definitions? Does it make clear that the listed examples of sexual misconduct, intimate<br>partner violence and stalking are not exhaustive? | stalking, harassment,<br>technology, sexual<br>misconduct, violence,<br>exhaustive |
| b. Does the policy make clear that these behaviors, as well as others that the school may deem inappropriate, are prohibited and may result in disciplinary and/or legal action?   | disciplinary action  |
| c. Within definitions, are key words defined, e.g., consent, force, incapacitation, physical assault?  | consent, force, assault,<br>define   |

| d. Does the language make unmistakably clear the need for affirmative consent to any<br>sexual activity? An unambiguous definition of consent is critical to a sound policy on sexual<br>misconduct.   | consent, sexual<br>misconduct           |
|--|---|
| e. Do students have input into the language used in these policies, to ensure that definitions and explanations are stated in a way that is easy for the general student body to understand?   | student, policy input                   |
| f. Is there a section which gives specific examples to clarify and illustrate the boundaries between what is prohibited and what is disrespectful, but does not violate law or policy?   | prohibited, violate                     |
| 4. Jurisdiction: Who is covered and where the policies pertain   |   |
| a. Is it clear who is included as "student," "faculty," "staff" and "contractor"?  | definition                              |
| b. Is it clear that student survivors have access to campus resources whether or not the<br>alleged perpetrator has an affiliation with the college/university?  | victim services                         |
| c. Is it clear how the policies apply to students who are employed by the college/university, e.g., RAs, TAs, graduate assistants, etc., and to employees who may be taking classes? Is it also clear how the policy applies to those working at the university under a contract or grant? | employee                                |
| d. What locations are covered by this policy? Specifically, are violations which occur off-<br>campus covered? If not, is the limit clearly, and broadly, defined, i.e., are off-campus<br>buildings which primarily serve the institution included?                                       | jurisdiction                            |
| e. Are offenses against students by persons not related to the institution addressed, as well as offenses committed by students against those who are not students?  | victim services                         |
| f. Does a partnership exist between schools that share close physical proximity? If a student at one school is assaulted by a student at a neighboring school, is there a system in place for these colleges to work together to a fair and just resolution for both/all parties?          | partnership, neighboring<br>schools     |
| g. For any offenses not covered by university policy, is it clear who has jurisdiction (e.g., police)?   | jurisdiction, police, policy            |
| h. Does the policy make clear that even when local law enforcement is involved, the school still has a duty to investigate?  | investigate, police, law<br>enforcement |
| 5. Faculty and Staff: Separately addressing various forms of relationships   |   |
| a. Is there a separate workplace policy that addresses gender-based violence involving<br>faculty or staff members?  | violence, faculty, staff,<br>workplace  |
| b. Do the college/university policies on sexual misconduct, intimate partner violence and<br>stalking address the issue of violence that occurs between students and faculty or<br>students and staff?   | violence, faculty, staff                |

| c. Are these policies sensitive to power differences, e.g., in institutional status, and their role in abuse?  | power, abuse, faculty<br>and staff      |
|--|---|
| d. Does the policy have clear guidance for students who allege sexual misconduct, intimate partner violence or stalking by faculty or staff members?   | violence, faculty, staff                |
| e. Is it clear that retaliation is not permitted, and the student will not be penalized,<br>academically or otherwise, for reporting the incident/s?   | retaliation, reporting                  |
| f. Is there protocol for students to make up any academic work they may miss as a result of the incident?  | academic<br>accommodations              |
| g. Is there a protocol for students to transfer jobs or miss work without penalty as a result of an incident?  | employee protocol,<br>victim, incident  |
| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and confidential   |   |
| a. Does the policy include the range of reporting options for those who have experienced gender-based violence?  | reporting, violence                     |
| i. Does it outline how to file a criminal complaint? Does it specify a resource for<br>help with filing a criminal complaint?  | forms, criminal,<br>complaint           |
| ii. Does it outline how to file an institutional complaint of violation of this policy?<br>Does it specify a resource for help in filing an institutional complaint?   | institutional complaint                 |
| iii. Does it specify how to file anonymous and confidential reports? Does it specify a resource for help in filing an anonymous and/or confidential report?  | confidential, anonymous<br>reporting    |
| iv. Does it indicate that reporters can expect amnesty for unrelated violations, e.g. underage use of alcohol?   | amnesty, exempt,<br>underage alcohol    |
| b. Does it specify clearly who is mandated to report incidents of violence of which they<br>become aware?  | mandated, reporting                     |
| i. Does it outline how to file such reports?   | reporting, violence                     |
| ii. Does it include guidelines for dealing with survivor requests for anonymity and<br>or confidentiality?   | confidentiality,<br>anonymity, survivor |
| c. Does it specify with whom in the college/university community one may have<br>confidential communications, i.e. who is not required to report?  | confidential, reporting                 |
| d. Does it recommend a confidential advocate as a starting place for a victim to determine the options for reporting?  | confidential, advocate,<br>reporting    |
| 7. Formal greivances process: Access to and information about pursuing a formal grievance  |   |
| a. Does the policy address Title IX investigations as an obligation of the institution in response to reported incidents of gender based violence? Does it name the Title IX officer and clarify the possibility for less formal investigations in some cases? | Title IX, grievance,<br>investigation   |

| b. Does it address the student conduct/grievance process and the criminal process, indicating clearly how a student can opt for both, either or neither route? Does it specify the student's role in choosing which processes to participate in? | grievance  |
|--|--|
| c. Does it include contact persons who can assist survivors and those accused with the grievance process?  | grievance, contact   |
| d. Is it clear that the above mentioned contact persons do not work for an "office of notice," but that their role is to help students work through the process?   | office of notice   |
| e. Is the student conduct/grievance process clearly described, including the rights and responsibilities of both accuser and accused?  | grievance, rights,<br>responsibilities, conduct            |
| i. Is it clear that a face-to-face meeting of accuser and accused is not part of the<br>process?   | meeting, grievance   |
| ii. Is it clear that the institution will use a preponderance of evidence standard, as<br>the Dear Colleague Letter specifies?   | perponderance, Dear<br>Colleague                           |
| iii. Are privacy and notification processes described? Is it clear, as the Dear<br>Colleague Letter requires, that both accuser and accused have an equal right to<br>notice of the outcome, any sanctions and appeal?                           | right, notice, sanctions,<br>appeal, Colleague,<br>privacy |
| f. Have those responsible for investigating or mitigating received specialized training?<br>Does this training include intimate partner violence, sexual misconduct, stalking,<br>workplace, and civil rights?                                   | mitigation, training,<br>investigation                     |
| g. Are sanctions that may be imposed for different offenses clearly spelled out?   | sanctions  |
| i. If there are offenses which warrant mandatory sanctions, is that clearly stated?  | mandatory sanctions  |
| ii. Are there more serious sanctions for repeat offenders? Is expulsion mandatory?   | repeat offender,<br>expulsion                              |
| iii. Are non-expulsion sanctions multifaceted, including punishment, treatment,<br>education, and monitoring?  | sanctions  |
| iv. Is there an individual on campus who is responsible for each area of<br>rehabilitation? Is there an individual responsible for overseeing the perpetrator's<br>progress and reevaluating the appropriateness of his remaining on campus?     | rehabilitation,<br>perpetrator                             |
| v. Is there a mandatory, more serious punishment should the perpetrator not<br>make progress or refuse to do that which is required of him, such as counseling<br>and training?  | mandatory, sanctions                                       |
| vi. Is there a mandatory relocation policy for perpetrators who live near their victims, such as in the same dormitory?  | mandatory relocation                                       |
| vii. Do sanctions include the mandatory suspension of athlete perpetrators from their teams?   | mandatory suspension,<br>athlete, perpetrator              |

| viii. Do sanctions include the mandatory suspension of fraternity member perpetrators from their fraternities and associated parties and events?  | mandatory suspension,<br>fraternity, perpetrator  |
|---|---|
| ix. Are there more serious mandatory sanctions for those involved in multipleperpetrator sexual misconduct?   | sanctions, sexual<br>misconduct   |
| 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances   |   |
| a. Is it clear in the policy that informal responses are offered in a context of a system that also offers formal grievance procedures, and that the victim's choice remains at the center of the school's response?  | informal, grievance,<br>victim, choice  |
| b. Are there named services, both on campus and in the community, which can be utilized to aid survivors in their desire for closure?   | on campus, off campus,<br>survivors, services   |
| c. Are there named services, both on campus and in the community, which can be utilized to help the alleged perpetrator not to reoffend, e.g., counseling services, dedicated men's non-violence groups?  | counseling, mens<br>violence, community,<br>campus  |
| d. Are faculty, staff and advocates trained to listen to survivors regarding how they want to approach the grievance process? Are they trained to balance the harms and offer survivor-centered safety planning?  | training, grievance,<br>safety planning, faculty  |
|   |   |
| 9. Administrative Accommodations For Those Affected By Gender-Based Violence:<br>Accommodations and personalized support for survivors  |   |
|   | housing, safety   |
| Accommodations and personalized support for survivors<br>a. Is it possible to provide alternative housing for the accused and/or accusing student to  | housing, safety<br>academic changes   |
| Accommodations and personalized support for survivors<br>a. Is it possible to provide alternative housing for the accused and/or accusing student to<br>increase safety?  |   |
| Accommodations and personalized support for survivors a. Is it possible to provide alternative housing for the accused and/or accusing student to increase safety? b. Is it possible to change a survivor's academic schedule to accommodate her/his needs?   | academic changes academic, accomodations,   |
| Accommodations and personalized support for survivors a. Is it possible to provide alternative housing for the accused and/or accusing student to increase safety? b. Is it possible to change a survivor's academic schedule to accommodate her/his needs? c. Are all professors required to offer academic accommodations to survivors?   | academic changes<br>academic,<br>accomodations,<br>survivors<br>tutors, academic<br>counseling, violence,   |
| Accommodations and personalized support for survivors         a. Is it possible to provide alternative housing for the accused and/or accusing student to increase safety?         b. Is it possible to change a survivor's academic schedule to accommodate her/his needs?         c. Are all professors required to offer academic accommodations to survivors?         d. Are tutors and academic counselors available?         e. May a survivor drop a class without penalty if his/her workload becomes too | academic changes<br>academic,<br>accomodations,<br>survivors<br>tutors, academic<br>counseling, violence,<br>victimization<br>survivor, drop class, |

| 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical, psychological, moral/spiritual, legal help on and off campus  |  |
|--|--|
| a. Does the policy clearly state where survivors and those accused of abusive behavior or concerned about their behavior may go for help, on and off campus?   | survivors, accused, help,<br>assistance  |
| b. Does the policy include survivor resources separately and specifically for intimate partner violence, sexual misconduct and stalking, e.g., medical resources for rape, advocacy and safety planning, cyber safety?   | survivor resources,<br>intimate partner<br>violence, rape, safety<br>planning, advocacy,<br>safety |
| c. Do drug and alcohol resources work closely with violence response resources?  | drug ,alcohol, services,<br>violence   |
| d. Are survivor resources accessible to and prepared for male victims of intimate partner violence, sexual misconduct and stalking?  | male victims   |
| e. Is there a "quick-link" on the school's website that accesses the school's policy and resource information?   | policy, resource, violence   |
| f. Are counseling and health services available 24/7?  | counseling, 24/7   |
| g. Is there a hotline that students can call 24/7?   | hotline, 24/7  |
| h. Are there peer groups on campus with whom survivors can meet to share their stories?<br>Is there peer support for concerned bystanders? Is there peer support for men concerned<br>about their violence?  | peer, violence, bystander  |
| i. Are Residential Advisors, House Masters, and other individuals who are employed by the university, specifically in residence life, required to attend training on sexual misconduct, intimate partner violence and stalking prevention and response? Is basic safety planning included in their training? | housing, resident life,<br>training,   |
| j. Do members of the campus clergy attend training on sexual misconduct, intimate  | religion, faith, training  |
| k. Is there an option for a student's cell phone to place emergency calls to campus police<br>and act as a tracking system if such a call is made?   | campus police,<br>emergency calls, cell<br>phone   |

### Color Descriptions:

All or Mostly in Compliance

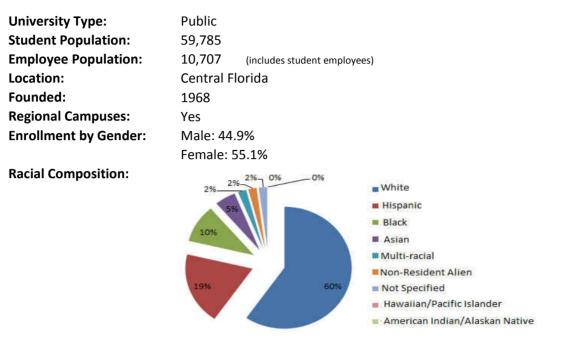
Unclear or In Need of Improvement

Incomplete or Not Accessible

# APPENDIX C: UNIVERSITY PROFILES AND FINDINGS SUMMARIES

# University of Central Florida

Orlando, Florida



Fall 2012 Data | Source: Facts About UCF (http://www.iroffice.ucf.edu/character/current.html#Head)

| 1. Purpose: Respectful and non-violent standards of interpersonal behavior. |        |      |  |
|---|--------|------|--|
| All or Mostly in Compliance   | 4 of 4 | 100% |  |
| Unclear or In Need of Improvement   | 0 of 4 | 0%   |  |
| Incomplete or Not Accessible  | 0 of 4 | 0%   |  |

| 2. Prevention: Culture that resists violence and abuse and promotes healthy relationships for all |          |     |  |
|---|----------|-----|--|
| All or Mostly in Compliance   | 12 of 18 | 67% |  |
| Unclear or In Need of Improvement   | 5 of 18  | 28% |  |
| Incomplete or Not Accessible  | 1 of 18  | 6%  |  |

| 3. Definitions of Key Terms and Language: Clear definitions and statements of prohibited |        |     |  |  |
|--|--------|-----|--|--|
| behaviors  |        |     |  |  |
| All or Mostly in Compliance  | 4 of 6 | 67% |  |  |
| Unclear or In Need of Improvement  | 1 of 6 | 17% |  |  |
| Incomplete or Not Accessible   | 1 of 6 | 17% |  |  |
|  |        |     |  |  |

| 4. Jurisdiction: Who is covered and wh | ere the polic | ies pertain |  |
|--|---------------|-------------|--|
| All or Mostly in Compliance            | 6 of 8        | 75%         |  |
| Unclear or In Need of Improvement      | 1 of 8        | 13%         |  |
| Incomplete or Not Accessible           | 1 of 8        | 13%         |  |

# 5. Faculty and Staff: Separately addressing various forms of relationships

| All or Mostly in Compliance       | 2 of 7 | 29% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 1 of 7 | 14% |
| Incomplete or Not Accessible      | 4 of 7 | 57% |

| 6. | Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |
|----|--|
| со | onfidential.   |

| connacticum                       |         |     |
|-----------------------------------|---------|-----|
| All or Mostly in Compliance       | 7 of 10 | 70% |
| Unclear or In Need of Improvement | 2 of 10 | 20% |
| Incomplete or Not Accessible      | 1 of 10 | 10% |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 8 of 19 | 42% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 4 of 19 | 21% |
| Incomplete or Not Accessible      | 7 of 19 | 37% |

#### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| All or Mostly in Compliance       | 4 of 4 | 100% |
|-----------------------------------|--------|------|
| Unclear or In Need of Improvement | 0 of 4 | 0%   |
| Incomplete or Not Accessible      | 0 of 4 | 0%   |

### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

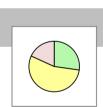
#### Accommodations and personalized support for survivors

| •                                 | . •    |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 3 of 7 | 43% |
| Unclear or In Need of Improvement | 1 of 7 | 14% |
| Incomplete or Not Accessible      | 3 of 7 | 43% |

# 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

#### psychological, moral/spiritual, legal help on and off campus

| All or Mostly in Compliance       | 3 of 11 | 27% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 11 | 55% |
| Incomplete or Not Accessible      | 2 of 11 | 18% |

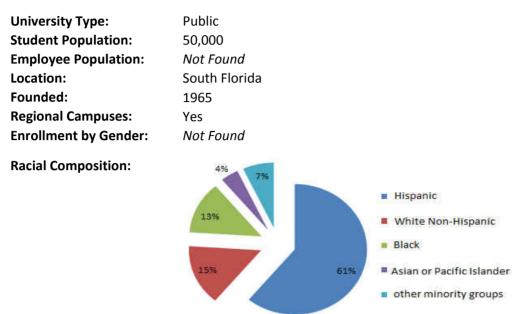






# Florida International University

Miami, Florida



Fall 2012 data | Source: Ranking and Facts | http://fiu.edu/about-us/rankings-facts/index.html

| standards o | f interpersonal behavior. |           |
|-------------|---------------------------|-----------|
| 4 of 4      | 100%                      |           |
| 0 of 4      | 0%                        |           |
| 0 of 4      | 0%                        |           |
|             | 4 of 4<br>0 of 4          | 0 of 4 0% |

| 2. Prevention: Culture that resists violence and abuse and | promotes healthy relationships for all |  |
|--|--|--|
|  |  |  |

| All or Mostly in Compliance       | 8 of 18 | 44% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 5 of 18 | 28% |
| Incomplete or Not Accessible      | 5 of 18 | 28% |

| 3. Definitions of Key Terms and Language: Clear definitions and statements of prohibited |        |     |  |
|--|--------|-----|--|
| behaviors  |        |     |  |
| All or Mostly in Compliance  | 2 of 6 | 33% |  |
| Unclear or In Need of Improvement  | 2 of 6 | 33% |  |
| Incomplete or Not Accessible   | 2 of 6 | 33% |  |

| 4. Jurisdiction: Who is covered and wh | ere the polic | ies pertain |  |
|--|---------------|-------------|--|
| All or Mostly in Compliance            | 5 of 8        | 63%         |  |
| Unclear or In Need of Improvement      | 3 of 8        | 38%         |  |
| Incomplete or Not Accessible           | 0 of 8        | 0%          |  |

| All or Mostly in Compliance       | 3 of 7 | 43% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 1 of 7 | 14% |
| Incomplete or Not Accessible      | 3 of 7 | 43% |

| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |
|---|
| confidential  |

| All or Mostly in Compliance       | 9 of 10 | 90% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 1 of 10 | 10% |
| Incomplete or Not Accessible      | 0 of 10 | 0%  |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 9 of 19 | 47% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 4 of 19 | 21% |
| Incomplete or Not Accessible      | 6 of 19 | 32% |

#### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| iorinal grievances                |        |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 3 of 4 | 75% |
| Unclear or In Need of Improvement | 0 of 4 | 0%  |
| Incomplete or Not Accessible      | 1 of 4 | 25% |

### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

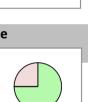
| 4 of 7 | 57%    |
|--------|--------|
| 2 of 7 | 29%    |
| 1 of 7 | 14%    |
|        | 2 of 7 |

### 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 4 of 11 | 36% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 3 of 11 | 27% |
| Incomplete or Not Accessible      | 4 of 11 | 36% |

| _ |
|---|
|   |
|   |



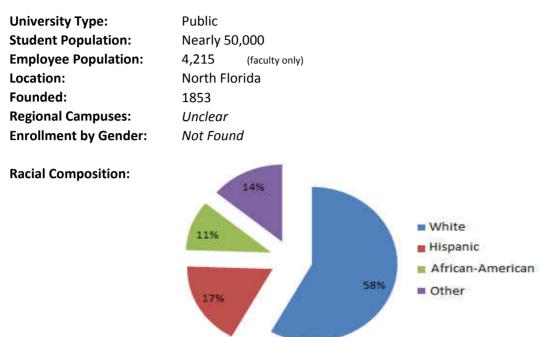






# University of Florida

Gainesville, Florida



Fall 2011 Data | Source: http://www.ufl.edu/wp-content/uploads/2011/09/Profile-of-Entering-Students.pdf

| 1. Purpose: Respectful and non-violent | standards o | f interpersonal behavior. |  |
|--|-------------|---------------------------|--|
| All or Mostly in Compliance            | 4 of 4      | 100%                      |  |
| Unclear or In Need of Improvement      | 0 of 4      | 0%                        |  |
| Incomplete or Not Accessible           | 0 of 4      | 0%                        |  |

| 2. Prevention: Culture that resists violence and abuse a | nd promotes healthy relationships for all |
|--|---|
|  |   |

| All or Mostly in Compliance       | 12 of 18 | 67% |
|-----------------------------------|----------|-----|
| Unclear or In Need of Improvement | 6 of 18  | 33% |
| Incomplete or Not Accessible      | 0 of 18  | 0%  |

| 3. Definitions of Key Terms and Langua | ige: Clear de | finitions and statements of prohibited |  |
|--|---------------|--|--|
| behaviors                              |               |  |  |
| All or Mostly in Compliance            | 5 of 6        | 83%                                    |  |
| Unclear or In Need of Improvement      | 0 of 6        | 0%                                     |  |

17%

| 4. Jurisdiction: Who is covered and wh | ere the polic | ies pertain |  |
|--|---------------|-------------|--|
| All or Mostly in Compliance            | 7 of 8        | 88%         |  |
| Unclear or In Need of Improvement      | 1 of 8        | 13%         |  |
| Incomplete or Not Accessible           | 0 of 8        | 0%          |  |

1 of 6

Incomplete or Not Accessible

| All or Mostly in Compliance       | 3 of 7 | 43% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 3 of 7 | 43% |
| Incomplete or Not Accessible      | 1 of 7 | 14% |

| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |
|---|
| confidential  |

| All or Mostly in Compliance       | 10 of 10 | 100% |
|-----------------------------------|----------|------|
| Unclear or In Need of Improvement | 0 of 10  | 0%   |
| Incomplete or Not Accessible      | 0 of 10  | 0%   |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 9 of 19 | 47% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 3 of 19 | 16% |
| Incomplete or Not Accessible      | 7 of 19 | 37% |

# 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| ionnai grievances                 |        |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 2 of 4 | 50% |
| Unclear or In Need of Improvement | 1 of 4 | 25% |
| Incomplete or Not Accessible      | 1 of 4 | 25% |

#### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

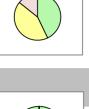
| 4 of 7 | 57%    |
|--------|--------|
| 2 of 7 | 29%    |
| 1 of 7 | 14%    |
|        | 2 of 7 |

# 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 4 of 11 | 36% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 11 | 55% |
| Incomplete or Not Accessible      | 1 of 11 | 9%  |

| е |  |
|---|--|
|   |  |

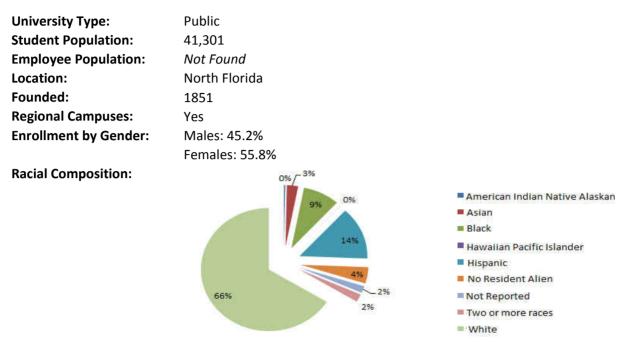






# Florida State University

Tallahassee, Florida



Fall 2012 Data | Source: http://www.ir.fsu.edu/studentinfo.cfm?ID=enroll

| 1. Purpose: Respectful and non-violent | standards o | f interpersonal behavior. |  |
|--|-------------|---------------------------|--|
| All or Mostly in Compliance            | 4 of 4      | 100%                      |  |
| Unclear or In Need of Improvement      | 0 of 4      | 0%                        |  |
| Incomplete or Not Accessible           | 0 of 4      | 0%                        |  |

| 2. Prevention: Culture that resists violence and al | buse and promotes healthy rela        | tionships for all |
|---|---------------------------------------|-------------------|
|   | ····· · · · · · · · · · · · · · · · · |                   |

| All or Mostly in Compliance       | 10 of 18 | 56% |
|-----------------------------------|----------|-----|
| Unclear or In Need of Improvement | 6 of 18  | 33% |
| Incomplete or Not Accessible      | 2 of 18  | 11% |

| 3. Definitions of Key Terms and Language: Clear definitions and statements of prohibited |        |     |  |   |
|--|--------|-----|--|---|
| behaviors  |        |     |  | _ |
| All or Mostly in Compliance  | 5 of 6 | 83% |  |   |
| Unclear or In Need of Improvement  | 0 of 6 | 0%  |  |   |
| Incomplete or Not Accessible   | 1 of 6 | 17% |  |   |

| 4. Jurisdiction: Who is covered and whe | ere the polic | ies pertain |  |
|---|---------------|-------------|--|
| All or Mostly in Compliance             | 7 of 8        | 88%         |  |
| Unclear or In Need of Improvement       | 1 of 8        | 13%         |  |
| Incomplete or Not Accessible            | 0 of 8        | 0%          |  |

| All or Mostly in Compliance       | 2 of 7 | 29% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 4 of 7 | 57% |
| Incomplete or Not Accessible      | 1 of 7 | 14% |

#### 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and confidential.

| All or Mostly in Compliance       | 9 of 10 | 90% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 1 of 10 | 10% |
| Incomplete or Not Accessible      | 0 of 10 | 0%  |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 9 of 19 | 47% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 3 of 19 | 16% |
| Incomplete or Not Accessible      | 7 of 19 | 37% |

#### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| lerina Brierances                 |        |      |
|-----------------------------------|--------|------|
| All or Mostly in Compliance       | 4 of 4 | 100% |
| Unclear or In Need of Improvement | 0 of 4 | 0%   |
| Incomplete or Not Accessible      | 0 of 4 | 0%   |

### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

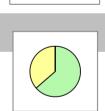
#### Accommodations and personalized support for survivors

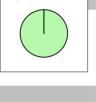
| · · · · · · · · · · · · · · · · · · · | •      |     |
|---------------------------------------|--------|-----|
| All or Mostly in Compliance           | 3 of 7 | 43% |
| Unclear or In Need of Improvement     | 1 of 7 | 14% |
| Incomplete or Not Accessible          | 3 of 7 | 43% |

# 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 7 of 11 | 64% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 4 of 11 | 36% |
| Incomplete or Not Accessible      | 0 of 11 | 0%  |

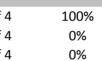
| <br>_ |
|-------|





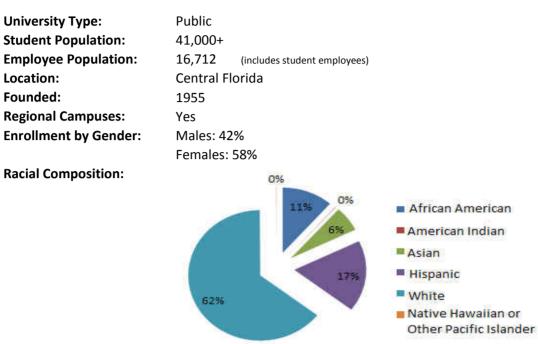






# University of South Florida

Tampa, Florida



C-5

Fall 2012 Data | Source: http://www.usf.edu/about-usf/facts-statistics.aspx ; http://www.usf.edu/pdfs/usf-facts-2012-13.pdf ; http://usfweb3.usf.edu/infocenter/?silverheader=15&report\_category=STU&report\_type=ECBPP&reportid=178795

| 1. Purpose: Respectful and non-violent | standards o | f interpersonal behavior. |  |
|--|-------------|---------------------------|--|
| All or Mostly in Compliance            | 4 of 4      | 100%                      |  |
| Unclear or In Need of Improvement      | 0 of 4      | 0%                        |  |
| Incomplete or Not Accessible           | 0 of 4      | 0%                        |  |

| 2. Prevention: Culture that resists violence and abuse and promotes healthy relationships for all |  |
|---|--|
|   |  |

| All or Mostly in Compliance       | 9 of 18 | 50% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 4 of 18 | 22% |
| Incomplete or Not Accessible      | 5 of 18 | 28% |

| 3. Definitions of Key Terms and Langua<br>behaviors | ge: Clear de | finitions and statemer | nts of prohibited |
|---|--------------|------------------------|-------------------|
| All or Mostly in Compliance                         | 5 of 6       | 83%                    |                   |
| Unclear or In Need of Improvement                   | 0 of 6       | 0%                     |                   |
| Incomplete or Not Accessible                        | 1 of 6       | 17%                    |                   |

| 4. Jurisdiction: Who is covered and whe | ere the polic | ies pertain |    |
|---|---------------|-------------|----|
| All or Mostly in Compliance             | 4 of 8        | 50%         |    |
| Unclear or In Need of Improvement       | 3 of 8        | 38%         |    |
| Incomplete or Not Accessible            | 1 of 8        | 13%         | )) |

| All or Mostly in Compliance       | 5 of 7 | 71% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 2 of 7 | 29% |
| Incomplete or Not Accessible      | 0 of 7 | 0%  |

| 6. Reporting and Disclosure: Encorage simp | e, effective reporting that is anonymous and |
|--|--|
| confidential.                              |  |

| All or Mostly in Compliance       | 8 of 10 | 80% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 1 of 10 | 10% |
| Incomplete or Not Accessible      | 1 of 10 | 10% |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 7 of 19 | 37% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 5 of 19 | 26% |
| Incomplete or Not Accessible      | 7 of 19 | 37% |

# 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| iorniai grievances                |        |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 3 of 4 | 75% |
| Unclear or In Need of Improvement | 1 of 4 | 25% |
| Incomplete or Not Accessible      | 0 of 4 | 0%  |

#### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

| All or Mostly in Compliance       | 5 of 7 | 71% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 0 of 7 | 0%  |
| Incomplete or Not Accessible      | 2 of 7 | 29% |

### 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 3 of 11 | 27% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 11 | 55% |
| Incomplete or Not Accessible      | 2 of 11 | 18% |



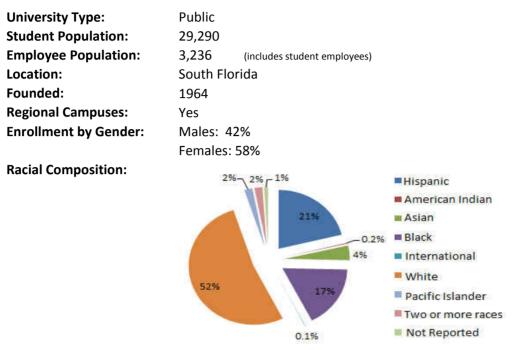






# Florida Atlantic University

Boca Raton, Florida



Fall 2011 Data | Source: http://pubweb.fau.edu/quickFacts2012/files/assets/downloads/publication.pdf

|        | terpersonal behavior. | -       |
|--------|-----------------------|---------|
| of 4   | 100%                  |         |
| ) of 4 | 0%                    |         |
| ) of 4 | 0%                    |         |
| )      | of 4                  | of 4 0% |

| 2. | Prevention: Culture that resists violence and a | abuse and promotes                    | s healthy rela    | tionships for | all |
|----|---|---------------------------------------|-------------------|---------------|-----|
|    |   | · · · · · · · · · · · · · · · · · · · | · · · · · · · · · | · · · •       |     |

| All or Mostly in Compliance       | 6 of 18 | 33% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 18 | 33% |
| Incomplete or Not Accessible      | 6 of 18 | 33% |

| 3. Definitions of Key Terms and Langua | age: Clear de | finitions and statements | of prohibited |
|--|---------------|--------------------------|---------------|
| behaviors                              |               |                          |               |
| All or Mostly in Compliance            | 2 of 6        | 33%                      |               |
| Unclear or In Need of Improvement      | 2 of 6        | 33%                      |               |
| Incomplete or Not Accessible           | 2 of 6        | 33%                      |               |

| 4. Jurisdiction: Who is covered and whe | ere the polic | ies pertain |  |
|---|---------------|-------------|--|
| All or Mostly in Compliance             | 5 of 8        | 63%         |  |
| Unclear or In Need of Improvement       | 2 of 8        | 25%         |  |
| Incomplete or Not Accessible            | 1 of 8        | 13%         |  |

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| All or Mostly in Compliance       | 2 of 7 | 29% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 1 of 7 | 14% |
| Incomplete or Not Accessible      | 4 of 7 | 57% |

| 6. Reporting and Disclosure: Encorage simple, effective repo | rting that is anonymous and |
|--|-----------------------------|
| confidential.  |                             |

| connacticum                       |         |     |
|-----------------------------------|---------|-----|
| All or Mostly in Compliance       | 9 of 10 | 90% |
| Unclear or In Need of Improvement | 0 of 10 | 0%  |
| Incomplete or Not Accessible      | 1 of 10 | 10% |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 10 of 19 | 53% |
|-----------------------------------|----------|-----|
| Unclear or In Need of Improvement | 2 of 19  | 11% |
| Incomplete or Not Accessible      | 7 of 19  | 37% |

# 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| iorinal grievances                |        |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 3 of 4 | 75% |
| Unclear or In Need of Improvement | 0 of 4 | 0%  |
| Incomplete or Not Accessible      | 1 of 4 | 25% |

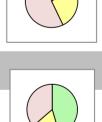
#### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

| •                                 | . •    |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 1 of 7 | 14% |
| Unclear or In Need of Improvement | 2 of 7 | 29% |
| Incomplete or Not Accessible      | 4 of 7 | 57% |

### 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 5 of 11 | 45% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 2 of 11 | 18% |
| Incomplete or Not Accessible      | 4 of 11 | 36% |



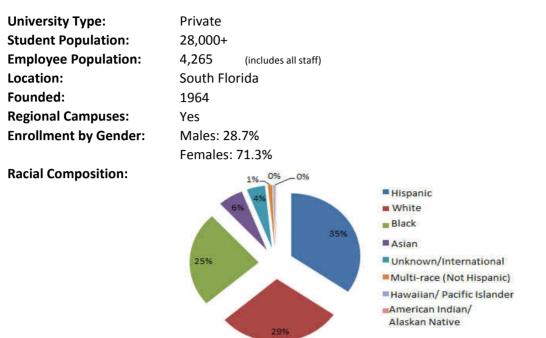






# Nova Southeastern University

Fort Lauderdale, Florida



2012 Data | Source: http://www.collegedata.com/cs/data/college/college\_pg06\_tmpl.jhtml?schoolId=1611

| 1. Purpose: Respectful and non-violent | standards o | f interpersonal behavior. |  |
|--|-------------|---------------------------|--|
| All or Mostly in Compliance            | 4 of 4      | 100%                      |  |
| Unclear or In Need of Improvement      | 0 of 4      | 0%                        |  |
| Incomplete or Not Accessible           | 0 of 4      | 0%                        |  |

#### 2. Prevention: Culture that resists violence and abuse and promotes healthy relationships for all

| All or Mostly in Compliance       | 2 of 18 | 11% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 9 of 18 | 50% |
| Incomplete or Not Accessible      | 7 of 18 | 39% |

| incomplete of Not Accessible           | 7 01 18          | 3970                                 |  |
|--|------------------|--------------------------------------|--|
|  |                  |                                      |  |
| 3. Definitions of Key Terms and Langua | ige: Clear defir | nitions and statements of prohibited |  |
| behaviors                              |                  |                                      |  |
| All or Mostly in Compliance            | 2 of 6           | 33%                                  |  |

| All or Mostly in Compliance       | 2 of 6 | 33% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 2 of 6 | 33% |
| Incomplete or Not Accessible      | 2 of 6 | 33% |

| 4. Jurisdiction: Who is covered and whe | ere the polic | ies pertain |  |
|---|---------------|-------------|--|
| All or Mostly in Compliance             | 3 of 8        | 38%         |  |
| Unclear or In Need of Improvement       | 4 of 8        | 50%         |  |
| Incomplete or Not Accessible            | 1 of 8        | 13%         |  |

| All or Mostly in Compliance       | 3 of 7 | 43% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 1 of 7 | 14% |
| Incomplete or Not Accessible      | 3 of 7 | 43% |

| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |
|---|
| confidential  |

| connucilitai.                     |         |     |
|-----------------------------------|---------|-----|
| All or Mostly in Compliance       | 1 of 10 | 10% |
| Unclear or In Need of Improvement | 8 of 10 | 80% |
| Incomplete or Not Accessible      | 1 of 10 | 10% |

### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 5 of 19  | 26% |
|-----------------------------------|----------|-----|
| Unclear or In Need of Improvement | 4 of 19  | 21% |
| Incomplete or Not Accessible      | 10 of 19 | 53% |

#### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| 3 of 4 | 75%    |
|--------|--------|
| 1 of 4 | 25%    |
| 0 of 4 | 0%     |
|        | 1 of 4 |

### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

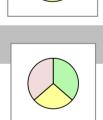
#### Accommodations and personalized support for survivors

|                                   | . •    |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 1 of 7 | 14% |
| Unclear or In Need of Improvement | 5 of 7 | 71% |
| Incomplete or Not Accessible      | 1 of 7 | 14% |

### 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 4 of 11 | 36% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 3 of 11 | 27% |
| Incomplete or Not Accessible      | 4 of 11 | 36% |

| P |
|---|
|   |

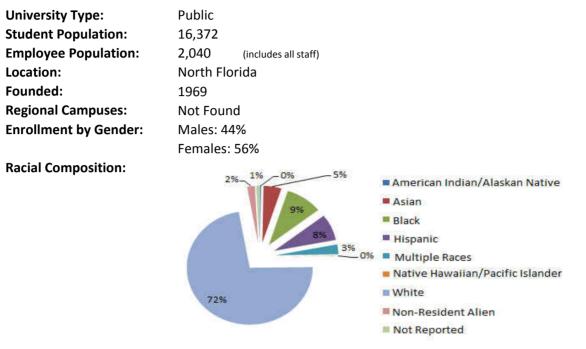






# University of North Florida

Jacksonville, Florida



Fall 2011 Data | Source: http://www.unf.edu/ia/pr/marketing\_publications/factsheet/2011/University\_Profile.aspx

| 1. Purpose: Respectful and non-violent | standards o | f interpersonal behavior. |  |
|--|-------------|---------------------------|--|
| All or Mostly in Compliance            | 4 of 4      | 100%                      |  |
| Unclear or In Need of Improvement      | 0 of 4      | 0%                        |  |
| Incomplete or Not Accessible           | 0 of 4      | 0%                        |  |

| 2. Prevention: Culture that resists violence and abuse and promotes healthy relationships for all |
|---|
|---|

| All or Mostly in Compliance       | 8 of 18 | 44% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 18 | 33% |
| Incomplete or Not Accessible      | 4 of 18 | 22% |

| behaviors                         | ge. clear de | finitions and stateme | ents of prohibited |
|-----------------------------------|--------------|-----------------------|--------------------|
| All or Mostly in Compliance       | 2 of 6       | 33%                   |                    |
| Unclear or In Need of Improvement | 4 of 6       | 67%                   |                    |
| Incomplete or Not Accessible      | 0 of 6       | 0%                    |                    |

| 4. Jurisdiction: Who is covered and wh | ere the polic | ies pertain |  |
|--|---------------|-------------|--|
| All or Mostly in Compliance            | 5 of 8        | 63%         |  |
| Unclear or In Need of Improvement      | 2 of 8        | 25%         |  |
| Incomplete or Not Accessible           | 1 of 8        | 13%         |  |

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| All or Mostly in Compliance       | 2 of 7 | 29% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 4 of 7 | 57% |
| Incomplete or Not Accessible      | 1 of 7 | 14% |

| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |
|---|
| confidential.   |

| All or Mostly in Compliance       | 10 of 10 | 100% |
|-----------------------------------|----------|------|
| Unclear or In Need of Improvement | 0 of 10  | 0%   |
| Incomplete or Not Accessible      | 0 of 10  | 0%   |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 9 of 19 | 47% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 3 of 19 | 16% |
| Incomplete or Not Accessible      | 7 of 19 | 37% |

# 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| iornial grievances                |        |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 3 of 4 | 75% |
| Unclear or In Need of Improvement | 0 of 4 | 0%  |
| Incomplete or Not Accessible      | 1 of 4 | 25% |

#### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

| 4 of 7 | 57%    |
|--------|--------|
| 2 of 7 | 29%    |
| 1 of 7 | 14%    |
|        | 2 of 7 |

# 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 3 of 11 | 27% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 11 | 55% |
| Incomplete or Not Accessible      | 2 of 11 | 18% |



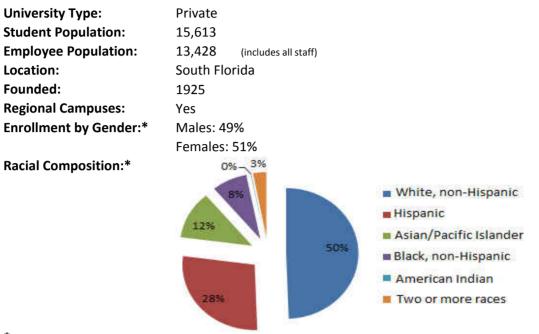






# University of Miami

Coral Gables, Florida



f \* – Based on Undergraduate population only

Fall 2012 Data | Source: http://www.miami.edu/index.php/about\_us/fast\_facts/student\_enrollment/

| 1. Purpose: Respectful and non-violent | standards o | f interpersonal behavior. |  |
|--|-------------|---------------------------|--|
| All or Mostly in Compliance            | 4 of 4      | 100%                      |  |
| Unclear or In Need of Improvement      | 0 of 4      | 0%                        |  |
| Incomplete or Not Accessible           | 0 of 4      | 0%                        |  |

| 2. Prevention: Culture that resists violence a | ind abuse and promotes                | healthy relationships for all |  |
|--|---------------------------------------|-------------------------------|--|
|  | · · · · · · · · · · · · · · · · · · · |                               |  |

| All or Mostly in Compliance       | 4 of 18  | 22% |
|-----------------------------------|----------|-----|
| Unclear or In Need of Improvement | 10 of 18 | 56% |
| Incomplete or Not Accessible      | 4 of 18  | 22% |



| 3. Definitions of Key Terms and Langua | ge: Clear de | finitions and statements of proh | ibited |
|--|--------------|----------------------------------|--------|
| behaviors                              |              |                                  |        |
| All or Mostly in Compliance            | 1 of 6       | 17%                              |        |
| Unclear or In Need of Improvement      | 3 of 6       | 50%                              |        |
| Incomplete or Not Accessible           | 2 of 6       | 33%                              |        |
|  |              |                                  |        |

| 4. Jurisdiction: Who is covered and whe | ere the polic | ies pertain |                  |
|---|---------------|-------------|------------------|
| All or Mostly in Compliance             | 2 of 8        | 25%         | $\left( \right)$ |
| Unclear or In Need of Improvement       | 2 of 8        | 25%         |                  |
| Incomplete or Not Accessible            | 4 of 8        | 50%         |                  |

| All or Mostly in Compliance       | 6 of 7 | 86% |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 0 of 7 | 0%  |
| Incomplete or Not Accessible      | 1 of 7 | 14% |

| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |         |     |  |  |  |
|---|---------|-----|--|--|--|
| confidential.   |         |     |  |  |  |
| All or Mostly in Compliance   | 6 of 10 | 60% |  |  |  |

| All or Mostly in Compliance       | 6 of 10 | 60% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 4 of 10 | 40% |
| Incomplete or Not Accessible      | 0 of 10 | 0%  |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 10 of 19 | 53% |
|-----------------------------------|----------|-----|
| Unclear or In Need of Improvement | 3 of 19  | 16% |
| Incomplete or Not Accessible      | 6 of 19  | 32% |

#### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| ionnai Bricvaneco              |                           |     |
|--------------------------------|---------------------------|-----|
| All or Mostly in Compliance    | 2 of 4                    | 50% |
| Unclear or In Need of Improvem | i <mark>ent</mark> 0 of 4 | 0%  |
| Incomplete or Not Accessible   | 2 of 4                    | 50% |

### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

| •                                 | <u> </u> |     |
|-----------------------------------|----------|-----|
| All or Mostly in Compliance       | 4 of 7   | 57% |
| Unclear or In Need of Improvement | 1 of 7   | 14% |
| Incomplete or Not Accessible      | 2 of 7   | 29% |
|                                   |          |     |

### 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical,

| All or Mostly in Compliance       | 2 of 11 | 18% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 7 of 11 | 64% |
| Incomplete or Not Accessible      | 2 of 11 | 18% |



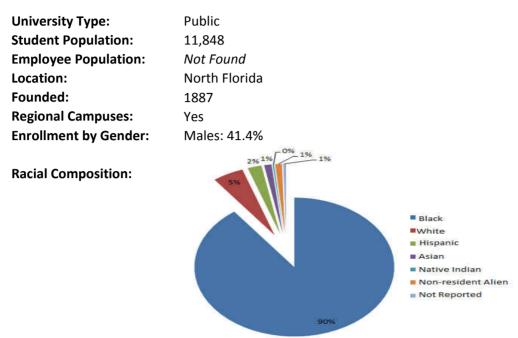






# <sup>c-10</sup> Florida Agricultural & Mechanical University

Tallahassee, Florida



2008-2009 Demographics | Source: http://www.famu.edu/index.cfm?AboutFAMU&Overview

| 1. Purpose: Respectful and non-violent |        |      |  |
|--|--------|------|--|
| All or Mostly in Compliance            | 4 of 4 | 100% |  |
| Unclear or In Need of Improvement      | 0 of 4 | 0%   |  |
| Incomplete or Not Accessible           | 0 of 4 | 0%   |  |
|  |        |      |  |

| 2. Prevention: Culture that resists violence and abuse and promotes healthy relationships for all |          |     |  |  |
|---|----------|-----|--|--|
| All or Mostly in Compliance   | 10 of 18 | 56% |  |  |
| Unclear or In Need of Improvement   | 4 of 18  | 22% |  |  |
| Incomplete or Not Accessible  | 4 of 18  | 22% |  |  |

| 3. Definitions of Key Terms and Language: Clear definitions and statements of prohibited |        |     |  |  |
|--|--------|-----|--|--|
| behaviors  |        |     |  |  |
| All or Mostly in Compliance  | 1 of 6 | 17% |  |  |
| Unclear or In Need of Improvement  | 1 of 6 | 17% |  |  |
| Incomplete or Not Accessible   | 4 of 6 | 67% |  |  |

| 4. Jurisdiction: Who is covered and wh | ere the polic | ies pertain |  |
|--|---------------|-------------|--|
| All or Mostly in Compliance            | 4 of 8        | 50%         |  |
| Unclear or In Need of Improvement      | 3 of 8        | 38%         |  |
| Incomplete or Not Accessible           | 1 of 8        | 13%         |  |
|  |               |             |  |

| All or Mostly in Compliance       | 0 of 7 | 0%  |
|-----------------------------------|--------|-----|
| Unclear or In Need of Improvement | 3 of 7 | 43% |
| Incomplete or Not Accessible      | 4 of 7 | 57% |

| 6. Reporting and Disclosure: Encorage simple, effective reporting that is anonymous and |
|---|
| confidential  |

| All or Mostly in Compliance       | 8 of 10 | 80% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 2 of 10 | 20% |
| Incomplete or Not Accessible      | 0 of 10 | 0%  |

#### 7. Formal greivances process: Access to and information about pursuing a formal grievance

| All or Mostly in Compliance       | 8 of 19 | 42% |
|-----------------------------------|---------|-----|
| Unclear or In Need of Improvement | 6 of 19 | 32% |
| Incomplete or Not Accessible      | 5 of 19 | 26% |

#### 8. Voluntary Informal Grievance Processes: Informal opportunities for those not wishing to file formal grievances

| iornial grievances                |        |     |
|-----------------------------------|--------|-----|
| All or Mostly in Compliance       | 2 of 4 | 50% |
| Unclear or In Need of Improvement | 2 of 4 | 50% |
| Incomplete or Not Accessible      | 0 of 4 | 0%  |

### 9. Administrative Accommodations For Those Affected By Gender-Based Violence:

#### Accommodations and personalized support for survivors

| 4 of 7 | 57%    |
|--------|--------|
| 1 of 7 | 14%    |
| 2 of 7 | 29%    |
|        | 1 of 7 |

#### 10. Resources For Those Affected By Gender-Based Violence: Easy access to medical, nsychological moral/spiritual legal help on and off campus

| sychological, moral/spintual, legal nelp on and on campus |         |     |
|---|---------|-----|
| All or Mostly in Compliance                               | 3 of 11 | 27% |
| Unclear or In Need of Improvement                         | 5 of 11 | 45% |
| Incomplete or Not Accessible                              | 3 of 11 | 27% |









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