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A Feminist Analysis of Campus Sexual Assault Policies: Results from a National Sample

Institutions of higher education (IHEs) in the United States are obligated to address sexual assault on campus under the Clery Act and Title IX, and a recent surge in societal interest in sexual assault among college students has prompted many IHEs to bolster their response. Little systematic information exists about IHEs' sexual assault policies and services and whether they align with feminist-based models of advocacy. This study examined annual security reports and student handbooks and codes of conduct for a nationally representative sample of 4-year IHEs (N = 387) and assessed IHEs' responses to sexual assault on college campuses through the lens of a feminist-based organizational model. Findings indicate that policies for the sampled IHEs include a mean of 12 of 17 policy components' aligned with feminist models, and 4% of sampled IHEs include all 17 components. Implications for improving IHEs' responses to sexual assault in ways consistent with feminist models are discussed.

BACKGROUND

Sexual assault is a serious problem on college campuses in the United States. Victims of

sexual assault may suffer psychological and emotional trauma, which can be long lasting (Petрак, 2002; see Bordere, 2017), and the threat of sexual assault impacts the larger college campus by creating an unsafe environment not conducive to learning and student growth (Fisher & Cullen, 2013). Further, highly publicized sexual assault and rape cases may have an impact on college reputations and create disincentives for student enrollment. Given the prevalence and consequences of sexual victimization, many institutions of higher education (IHEs) have enacted or reevaluated administrative policies and codes of conduct in an effort to better respond to victims and to comply with the growing body of federal legislation regarding gender-based violence (e.g., sexual assault, dating violence, domestic violence, stalking). However, little published research has focused on university compliance with federal mandates (for a discussion, see Gregory & Janosik, 2007), best practices, or the degree to which university compliance may affect survivors of sexual assault.

The theory of gendered organizations provides a useful framework for analyzing IHEs' policy and procedures regarding sexual violence on their campuses (Acker, 1990). Similar to Nichols's (2011) application to examine domestic violence organizations, our approach here examines three possible models of gendered processes present in IHEs. Organizations steeped in a feminist gender-based model "recognize

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differences between men and women but assume women's agency as rational, independent, capable decision makers" and attempt to disrupt gender inequality (Nichols, 2011, p. 113). Comparatively, those aligned with a patriarchal gender-based model presume that women are "passive, dependent, in need of protection, and lacking in agency" and perpetuate gender inequality (Nichols, 2011, p. 113). Last, gender-neutral-based models "ignore gender, under the ideological assumption of 'sameness,' that men and women are the same and should be treated as such" and thus do not take action to intervene when gender-based inequities occur (Nichols, 2011, p. 113). Using a nationally representative sample of Title IX eligible 4-year IHEs, our present research examines publicly available information on campus sexual misconduct policies and procedures to assess the extent to which universities have adopted policies and procedures related to campus sexual assault and how such policies align with a feminist gender-based model to address the needs of sexual assault victims.

CONTEXT OF SEXUAL ASSAULT AMONG COLLEGE STUDENTS

Although estimates of sexual assault among college students vary depending on research methodology, victimization surveys suggest that as many as 25% of women and 5% of men will be sexually assaulted as college students (Cantor et al., 2015; Krebs, Lindquist, Warner, Fisher, & Martin, 2007). Further, lesbian, gay, bisexual, transgender, and questioning (LGBTQ) students may be at an increased risk for sexual assault than their heterosexual peers (Cantor et al., 2015).

A sizable body of literature has documented the context of sexual assault among college students. Sexual assaults of college women often include alcohol and/or drugs (Fisher, Daigle, & Cullen, 2010; Koss & Dinero, 1989); 35.2% of college women who reported sexual assaults in the National Crime Victimization Survey (NCVS) also reported that the offender was using drugs and/or alcohol at the time of the assault (Rennison & Addington, 2014). Other studies have documented that a considerable proportion of rapes involve victim incapacitation by alcohol or drugs (Cantor et al., 2015; Krebs, Lindquist, Berzofsky, Shook-Sa, & Peterson, 2007; McCauley, Ruggiero, Resnick,

& Kilpatrick, 2010; Mohler-Kuo, Dowdall, Koss, & Wechsler, 2004).

Sexual assault is severely underreported to law enforcement generally (e.g., Tjaden & Thoennes, 2006), and college student victims in particular rarely report sexual assault to the police (Fisher, Daigle, Cullen & Turner, 2003). Approximately 5% of sexual assault incidents among college students are reported either to campus law enforcement or to community law enforcement (Krebs, Lindquist, Berzofsky, Shook-Sa, & Peterson, 2016), which is a lower reporting rate than similarly aged noncollegiate women (Rennison & Addington, 2014). Relatedly, few student victims report that they received services after reporting an assault. For example, approximately 87% of college women reporting sexual assault in the NCVS indicated that they did not receive victim services after the assault (Rennison & Addington, 2014; see also Cantor et al., 2015). That said, survivors of sexual assault often turn to an informal provider for support (Ahrens, 2006; Ahrens, Campbell, Ternier-Thames, Wasco, & Sefl, 2007; Ullman & Siegel, 1995), and college student survivors of sexual assault often choose friends as their support provider of choice (Orchowski & Gidycz, 2012). Given the relatively high risk and particular reporting tendencies of student survivors of sexual assault, legislation specific to addressing sexual assault on campus—Title IX of the Educational Amendments of 1972 (Title IX) and the Student Right-to-Know Act and Campus Security Act of 1990 (also known as the Clery Act; Gregory & Janosik, 2013)—has been enacted. Prior research has not, however, examined legislatively mandated policies in the context of organizational models of gender and theoretical approaches to sexual assault.

RESPONSES TO SEXUAL ASSAULT VICTIMS AND ORGANIZATIONAL MODELS OF GENDER

As explained by Nichols (2011), organizations and their associated policies, structures, ideologies, and working relationships reflect one of three models: feminist gender-based, patriarchal gender-based, and gender neutral. Although each model is briefly described here, the focus of this analysis is on feminist gender-based models.

Feminist gender-based models of organizational policy and practice focus on survivor-empowered action and active participation by survivors. Zweig and Burt (2007) found a direct

correlation between women's sense of control when working with domestic violence and sexual assault service agencies and their likelihood to seek services from the agency in the future. In this vein, a feminist gender-based response to campus sexual assault assumes survivor's agency and focuses on survivor empowerment and control in the disclosure process as well as when seeking services (e.g., Allen, Larsen, Trotter, & Sullivan, 2013; Sullivan & Bybee, 1999). Feminist-based advocacy recognizes that sexual violence removes control from survivors and consciously seeks to return that control, enabling victims to decide whether to seek medical treatment or make a police report, or even whether to speak with an advocate at all (see Maier, 2008). Survivors have reported high satisfaction from services designed around feminist gender-based advocacy (Zweig & Burt, 2007).

Moreover, in the area of intimate partner violence, which often includes sexual assault, feminist approaches increase safety and reduce violence. For example, a series of evaluation studies by Sullivan and colleagues (e.g., Allen et al., 2013; Sullivan & Bybee, 1999; Sullivan, Sutherland, & Allen, 1998) demonstrated that when survivors had access to comprehensive woman-centered paraprofessional advocates for 10 weeks after leaving a domestic violence shelter, they experienced less violence over time. Notably, the intervention they evaluated did not focus on changing the batterers' behavior; rather, it emphasized that women are the experts on their own lives and are in the best position to choose which resources and services will be most beneficial to themselves.

Similarly, the recent increase in attention regarding campus sexual assault—what President Obama referred to as “a renewed call to action” (White House Council on Women and Girls, 2014)—has largely been the result of grassroots efforts by student victims, many of whom have served in critical roles advancing IHEs' responses to survivors of sexual assault. For example, the student-led groups *SurvJustice* and *Know Your IX* were among the negotiators in the rule-making process for the 2013 Campus Sexual Violence Elimination Act (SaVE Act). These grassroots organizations and their work are examples of feminist approaches to sexual assault; they emphasize systems advocacy by endeavoring not just to change individual women's lives but also to reform policies and

procedures to better meet the needs of all survivors (Nichols, 2014a, 2014b).

Comparatively, patriarchal-gender based models of sexual assault services treat (the mostly female) survivors as passive, dependent, and in need of male protection (Lloyd, Emery, & Klatt, 2009; Nichols, 2011). Survivor “agency” in this context is either completely absent or limited to a narrow set of behaviors, such as pressing charges or behaving in ways that may reduce the risk of assault in the first place (Lloyd et al., 2009). Patriarchal victim services mimic the loss of control inherent in victimization and may lead to survivors receiving services that they do not want. Victim service strategies that include “mandatory services” have been critiqued extensively in the literature for their potential to have unintended consequences for survivors. For instance, mandatory arrest policies for intimate partner violence have led to higher arrest and conviction rates, but they have also led to a higher number of survivors being arrested (as perpetrators) when acting in self-defense (e.g., Miller, 2005). In her in-depth qualitative study of women's help seeking at a domestic violence shelter, Moe (2007) found that women's agency was a critical piece of their experience; those who were denied agency by patriarchal gender-based or gender-neutral practices were more frustrated by their experiences and were ultimately less safe.

A third model, gender-neutral responses to violence, relies on the assumption that men and women are the same and fail to consider differences in the experiences of victims on the basis of gender and sexual orientation as well as gendered expectations by others. In gender-neutral advocacy, policies and practices are uniformly applied and do not take gender dynamics into consideration, thus increasing the risk of victim blaming attitudes and adherence to myths about rape and other forms of gendered violence. In their study of custody evaluators, Haselschwerdt, Hardesty, and Hans (2011) found that those evaluators who espoused gender-neutral beliefs about intimate partner violence were more likely to believe myths about it. For instance, they indicated that “real” intimate partner violence leads to criminal charges; if there is no police record, then there is little cause for concern. Similarly, they greatly exaggerated the frequency with which women made false abuse accusations. In turn, these gender-neutral beliefs by custody evaluators were linked to their custody

recommendations, which have implications for the safety of survivors and their children. Similarly, Hardesty and Ganong (2006) found that courts expect women divorcing abusive partners to participate in mediation and coparenting interventions, even when doing so may be at best unhelpful and at worst dangerous.

Gender-neutral advocacy may also be especially detrimental for college victims of sexual assault given the push for campuses to standardize their responses. As conceptualized by Nichols (2011), organizations with gender-neutral models can have practices that are asserted to be neutral but demonstrate a lack of sensitivity to gender and power dynamics, thus resulting in biases. Further, prior research suggests that the vast majority of sexual assaults perpetrated against college students do resonate with cultural myths regarding the circumstances of “real” rape (i.e., physically violent rape by a stranger), as most sexual assaults against college women are perpetrated by someone the survivor knows (Belknap & Erez, 2007; Fisher et al., 2010; Rennison & Addington, 2014), do not include a weapon (Fisher et al., 2010), and often involve alcohol use (Fisher et al., 2010; Koss & Dinero, 1989). In addition, LGBTQ students report higher rates of sexual violence than their heterosexual counterparts (Cantor et al., 2015)—a finding that should both inform and further dissuade a standardized response to sexual violence.

THE PRESENT STUDY

The present research uses a representative sample of Title IX eligible 4-year IHEs, including all such historically Black colleges and universities (HBCUs) and tribal colleges and universities, to investigate campus sexual misconduct policies and procedures. We examine variables related to IHE policies and implementation, victim reporting, and victim support in the context of feminist gender-based models of advocacy. Given indications that organizational policies and procedures resulting from feminist-based organizational models are more attuned to the needs of survivors and may foster better outcomes (e.g., experiencing less domestic violence over time; Allen et al., 2013; Sullivan & Bybee, 1999; Sullivan, Sutherland, & Allen, 1998), the degree to which IHE responses to federal mandates illustrate feminist gender-based models are discussed. The following research questions guided

the present study: (a) How do the policies and procedures enacted to address campus sexual assault align with feminist gender-based models of organizations? (b) More specifically, to what extent have 4-year IHEs adopted components of best practices and mandates aligned with feminist-based organizational models? and (c) What percentage of IHEs have fully integrated feminist-based organizational models in their policies, and what content is included in these policies?

METHOD

Sample

The sample was drawn from the National Center for Education Statistics’ Integrated Postsecondary Education Data System (IPEDS) 2013 survey, an annual survey of institutions of higher education in the United States. Inclusion criteria for the sampling frame required that the IHE offer at least a 4-year degree, provided at least some instruction on a physical campus, and was a Title IV participant (i.e., recipient of federal funds that compel compliance with federal legislation such as Title IX and the Clery Act). Sampling began by identifying the total population of 4-year HBCUs ($n = 89$) and tribal colleges and universities ($n = 13$). Given their small numbers, the total population of these schools was included in the sample. Among the remaining institutional types—4-year (or more) public institutions, 4-year (or more) private non-profit institutions, and 4-year private for-profit institutions—a proportional, stratified random sample was drawn. Six schools identified from the IPEDS data were closed and three schools did not have a website—these nine schools are considered missing. Comparisons of the total population and sample for the present research are presented in Table 1. The total working sample included 387 IHEs and were located across all 50 states and the District of Columbia.

Data Collection

Consistent with prior research examining IHEs’ sexual assault policies and procedures (i.e., Karjane, Fisher, & Cullen, 2002; Richards, 2016), data for the present analyses were drawn from IHEs’ annual security reports (ASRs) and student handbooks and codes of conduct. The documents were publicly available through IHE websites. The Clery Act mandates that IHEs publish

Table 1. Sample Selection from 4-year (or More) Institutions of Higher Education (IHEs)

IHE classification	Population <i>n</i> (% of all IHEs)	Sample <i>n</i> (% within classification)	Working sample <i>n</i> (% of sample)
Stage 1			
HBCU	89 (2.9%)	89 (100%)	89 (100%)
Tribal	13 (0.4%)	13 (100%)	13 (100%)
Stage 1 subtotal	<i>n</i> = 102	<i>n</i> = 102	<i>n</i> = 100
Stage 2			
Public	647 (21.3%)	65 (10.0%)	65 (100%)
Private nonprofit	1,545 (50.9%)	155 (10.0%)	153 (98.7%)
Private for-profit	739 (24.4%)	74 (10.0%)	67 (90.5%)
Stage 2 subtotal	<i>n</i> = 2,931	<i>n</i> = 292	<i>n</i> = 277
Total	3,033	396	387

a range of information regarding their crime policies and procedures as well as resources and programming related to crime prevention and victimization in their ASR. Two trained research assistants reviewed the sampled IHEs' ASRs, student handbooks, and conduct policies and extracted information on a series of dichotomous measures. Data collection was completed between October 1, 2015, and January 20, 2016.

Measures

Using the previously described literature regarding feminist gender-based advocacy, a series of dichotomous (*no* = 0, *yes* = 1) items were developed and answered for each IHE in the areas of policy content (three items), policy implementation (two items), victim reporting (three items), victim reporting facilitators (three items), and victim supports (six items) (see Table 2 for the specific items in each of these areas). Scores for each IHE on the 17 items were summed, with higher scores reflecting better alignment with feminist-based organizational models.

Analytical Approach

Content analysis was conducted utilizing SPSS 23. A trained research assistant reviewed the ASRs and student handbooks and codes of conduct for each IHE, extracted the information related to each measure, and imputed the information to an SPSS data file. To assess interrater reliability, a second coder also coded the information for 10% of the cases (*n* = 39), with perfect interrater reliability between the coders.

FINDINGS

Response frequencies associated with each variable for the total sample and the IHE types are depicted in Table 2. Perfect alignment with feminist-based organizational models, according to our conceptualization and measurement (indicated by a *yes* response on each, for a total score of 17) was attained by 17 IHEs (4% of the sample), including five HBCUs (5.6%), three 4-year public IHEs (4.6%), and nine 4-year private nonprofit IHEs (0.6%), but no for-profit or tribal IHEs were among that group. The overall mean score was 11.9 (*SD* = 3.0, range = 0–17); however, there was wide variation across IHE sector types. The mean score for HBCUs was 12.5 (*SD* = 2.9, range = 3–17), 11.2 (*SD* = 2.1, range = 7–14) for tribal IHEs, 13.4 (*SD* = 1.9, range = 8–17) for public IHEs, 11.6 (*SD* = 3.4, range = 0–17) for private nonprofit IHEs, and 10.6 (*SD* = 2.8 range = 1–15) for private for-profit IHEs.

Presence of 16 Title IX Policies Among IHEs

Policy Content. A vast majority (99%) of IHEs provided a Title IX policy against sex discrimination, and most IHEs (98%) also provided a sexual misconduct policy that was separate from the Title IX policy against sex discrimination. More than half of IHEs (62%) provided a consent policy that was aligned with conceptions of affirmative consent.

Policy Implementation. Regarding implementation of policies, 68% of IHEs identified who is responsible for making sure that the policy is followed as written. Comparatively, 48% of IHEs indicated how students could raise concerns about the policy.

Table 2. IHE Responses to Student Peer Sexual Violence

	Total sample <i>N</i> = 387 <i>n</i> (%)	HBCU <i>n</i> = 89 <i>n</i> (%)	Tribal <i>n</i> = 13 <i>n</i> (%)	Public <i>n</i> = 65 <i>n</i> (%)	Private nonprofit <i>n</i> = 153 <i>n</i> (%)	Private for-profit <i>n</i> = 67 <i>n</i> (%)
Policy Content						
Has a Title IX policy against sex discrimination	385 (99%)	78 (88%)	12 (92%)	63 (97%)	134 (88%)	65 (97%)
Has a separate disciplinary policy that addresses sexual assault	378 (98%)	87 (98%)	13 (100%)	61 (94%)	135 (88%)	54 (81%)
Has an affirmative consent policy ^a	237 (62%)	37 (42%)	6 (46%)	38 (58%)	105 (69%)	51 (76%)
Policy Implementation						
The sexual assault policy identifies how students can raise concerns about the policy	184 (48%)	48 (54%)	6 (46%)	42 (65%)	61 (40%)	27 (40%)
The sexual assault policy identifies who is responsible for making sure the policy is followed as written	263 (68%)	66 (74%)	8 (62%)	58 (89%)	95 (62%)	36 (54%)
Victim Reporting						
Identifies a Title IX coordinator	325 (84%)	81 (91%)	7 (54%)	65 (100%)	129 (84%)	43 (64%)
Victims have the option to report sexual assault anonymously	350 (90%)	87 (98%)	13 (100%)	61 (94%)	135 (88%)	54 (81%)
Victims have the option to report assault confidentially	360 (93%)	87 (98%)	13 (100%)	64 (98%)	135 (88%)	61 (91%)
Victim Reporting Facilitators						
Has an amnesty policy for students using drugs and or alcohol when they were sexually assaulted	111 (29%)	24 (27%)	1 (8%)	26 (40%)	54 (35%)	6 (9%)
States that the accuser's sexual history cannot be discussed at disciplinary hearings	70 (18%)	25 (28%)	1 (8%)	14 (21%)	24 (16%)	6 (9%)
States that the accuser's dress cannot be discussed at disciplinary hearings	27 (7%)	10 (11%)	0 (0%)	8 (12%)	7 (5%)	2 (3%)
Victim Supports						
Informs students that it will assist with notification of law enforcement after a sexual assault	328 (85%)	81 (91%)	11 (85%)	64 (98%)	118 (77%)	53 (79%)
Offers victims on campus counseling	356 (92%)	88 (99%)	12 (92%)	65 (100%)	144 (94%)	46 (69%)
Offers victims on campus victim advocate	290 (74%)	78 (88%)	13 (100%)	54 (83%)	101 (66%)	44 (66%)
Identifies off-campus resources (e.g., counseling, advocacy, etc.)	350 (88%)	72 (81%)	8 (62%)	61 (94%)	124 (81%)	58 (87%)
Notifies students that it will assist victims of sexual assault with changes in academic/living arrangements	326 (84%)	74 (83%)	10 (77%)	61 (94%)	120 (78%)	61 (91%)
Includes provisions to protect students wrongly accused of sexual assault	289 (75%)	69 (76%)	10 (77%)	60 (92%)	107 (70%)	43 (64%)

^aFive IHEs did not provide consent policies.

Victim Reporting. Title IX coordinators were identified at 84% of IHEs. The majority of IHEs also identified mechanisms for anonymous (90%) and confidential (93%) victim reporting.

Victim Reporting Facilitators. Fewer than one-third (29%) of IHEs indicated that the IHE had an amnesty policy regarding drug and alcohol code of conduct violations for victims and witnesses who report sexual assault in good faith. Even fewer IHEs (18%) noted that the IHE prohibited the discussion of the accuser's sexual history at disciplinary hearings.

Victim Supports. The majority of IHEs indicated that IHE staff would provide assistance with notification of law enforcement after a sexual assault and assist victims of sexual assault with changes in academic and living arrangements (85% and 84%, respectively). Most IHEs offered on-campus counseling (92%), and 75% offered victims an on-campus victim advocate. Finally, 75% of IHE policies included provisions to protect students wrongly accused of sexual assault.

Comparison of IHEs Most Aligned with Feminist Models

All 17 IHEs with a "perfect" score of 17 had both a Title IX policy against sex discrimination and a separate sexual misconduct policy. According to the U.S. Department of Education, Office for Civil Rights (OCR, 2014), at a minimum, sex discrimination policies should include "that the school does not discriminate on the basis of sex in its education programs and activities, and that it [the IHE] is required by Title IX not to discriminate in such a manner" (p. 10). Comparatively, sexual misconduct policies explicitly forbid sexual violence (and, in some cases, other forms of gender-based violence). For example, Hampton University (2015) indicated that the institution "will not tolerate domestic violence, dating violence, sexual assault, stalking, or other forms of sexual misconduct" (p. 17), and the University of North Carolina Asheville (2016) reported that the institution "is committed to providing a safe learning and working environment, and in compliance with federal law has adopted policies and procedures to prevent and respond to incidents of sexual violence

including sexual assault, domestic violence, dating violence, and stalking" (p. 19).

Each of the 17 IHEs with perfect scores presented a consent policy aligned with the notion of affirmative consent. Affirmative consent policies require that the person initiating a sexual encounter receive a yes (verbal or otherwise) from the other party or parties for the sexual contact to be consensual, and that the consent be ongoing. Affirmative consent contrasts with prior laws that emphasized the ways in which women were expected to say no or resist sexual assault; a failure to resist appropriately or strongly enough was construed to mean an assault did not occur (Caringella, 2009). Affirmative consent policies are intended to create an environment in which receipt of active consent is the expectation, consistent with feminist approaches to sexual assault. For example, Hampton University (2015) indicated that

consent is a voluntary agreement to engage in sexual activity. Consent for sexual activity can only be obtained in situations where all people involved have equal power and full awareness in deciding what sexual activity will and will not happen during an encounter. . . . Silence, previous consent, or absence of resistance does not imply consent. Consent is not final or irrevocable and can be withdrawn at any time. (p. 24)

Each of the 17 IHEs identified the individual(s) responsible for ensuring that the sexual misconduct policy was followed as written and indicated how students could raise concerns about the policy. Transparency regarding the person or persons accountable for the implementation of the policy is important given that even the most comprehensive policy is meaningless unless it is followed in practice. Likewise, clearly identifying the process for making changes to existing policies is key to facilitating survivor-led efforts; increasing agency among survivors of violence over their own outcomes has been found to improve experiences of recovery and outcomes (Nichols, 2011) and is aligned with feminist-based organizational structures in that doing so provides a clear avenue for bottom-up change.

Further, Title IX coordinators were identified at each of the 17 IHEs. The Title IX coordinator's principle function is administrative and major duties include maintaining the IHE's policies, prevention programs, data collection,

and grievance policies. Given that the Title IX coordinator's primary role is to coordinate the IHE's compliance with Title IX mandates, the Title IX coordinator may not be able to protect the confidentiality of the victim. As such, importantly, each IHE identified mechanisms for anonymous and confidential victim reporting. Student victims must have access to support providers whose sole mandate is to support them—even if they do not choose to move forward with official university action. In addition, the White House Task Force (2014) suggested that, "after survivors receive initial, confidential support, they often decide to proceed with a formal complaint or cooperate in an investigation" (p. 11). Thus, feminist avenues of support that empower victims to make their own choices about reporting to administrators (i.e., Title IX coordinators) may also be associated with subsequent utilization of official reporting mechanisms (see also Nichols, 2014b).

Each of the 17 IHEs also reported having an amnesty policy for students using drugs and/or alcohol at the time of the assault and a policy stating that the accuser's sexual history cannot be discussed at disciplinary hearings. Given the established role of alcohol in sexual assault among college students (Abbey, 2002; Frintner & Rubinson, 1993), and that drug and alcohol use has been associated with a lower probability of reporting sexual assault to law enforcement (Kilpatrick, Resnick, Ruggiero, Conoscenti, & McCauley, 2007), the importance of amnesty policies cannot be understated. Further, focusing on a victim's prior sexual history may (a) result in victim blaming and additional trauma for sexual assault survivors, and (b) remove responsibility for the assault from the alleged perpetrator.

Finally, all 17 IHEs described the ways in which they provide additional assistance to victims aside from the formal reporting process. These supports included notifying students that the IHE would provide assistance with notification of law enforcement after a sexual assault, on-campus counseling, on-campus victim advocates, assistance with changes in academic and living arrangements, and connections to off-campus resources (e.g., counseling, advocacy). Further, although false reports are rare (see Weiser, 2017), it is still beneficial that each IHE indicated protections for students wrongly accused of sexual assault.

IMPLICATIONS FOR FEMINIST PRAXIS

From consideration of gendered processes present in organizations and the policies examined here, we contend that those reflecting feminist approaches to addressing sexual assault on campus, as well as in the larger community, have the potential to yield better outcomes for survivors while holding perpetrators accountable. However, only 4% of the IHEs sampled demonstrated each of the components of a comprehensive feminist response consistent with feminist-gendered models. Nonetheless, we are heartened that IHEs had implemented an overall mean of 12 components associated with feminist models.

Many of the components of feminist approaches described here are relatively easy to implement, such as amnesty policies and allowing survivors to change their living arrangements and course schedules. Even the more complicated policies, such as defining sexual misconduct or providing advocates, can be relatively low cost for institutions if existing resources are harnessed. For example, the White House Task Force (2014) provided a checklist for sexual misconduct policies as part of the Not Alone campaign (also see Karjane et al., 2002) as well as sample memoranda of understanding for IHE partnerships with community support providers (e.g., rape crisis centers). Administrators, faculty, and staff members are encouraged to use the "models" presented here to critique their institution's current practices and provide direction for means by which they can improve policies and procedures as well as work to raise awareness regarding these among their student populations.

Raising awareness about available resources and policies, and of gender-based violence more broadly, may be particularly critical to facilitate reporting on campus. If students do not define their experiences as assault (e.g., Clements & Ogle, 2009; Koss, 1992), they will not report assaults, even as they struggle with the emotional impact. Likewise, when students do label their experiences as assault, but are not aware of available resources on campus, they are unlikely to use these resources.

Although the policies themselves may be relatively straightforward to implement, particularly when existing resources can be mobilized, creating institutional change to move toward implementation of (additional) feminist responses to sexual assault is not an easy feat.

Organizational change of any sort requires buy-in and support from institutional leaders. Unfortunately, there are indications that many university administrators underestimate the seriousness of the sexual assault problem on their college campuses. Indeed, the 2015 Higher Ed Survey of College and University Presidents found that 32% of university presidents agreed and 42% were neutral with regard to whether sexual assault was a widespread problem on college campuses generally; however, 77% disagreed that it was prevalent on their campus (Inside Higher Ed, 2015). Thus, creating change will require effort to ensure buy-in from the upper levels of administration at IHEs. Feminist faculty may be particularly positioned, given their research skills and disciplinary knowledge, to reach the upper administration in ways that may be more difficult for counseling center or student affairs staff (see Sharp et al., 2017). Moreover, feminist scholars in administrative positions within universities may be well positioned to do feminist praxis by working in collaboration and solidarity with those who share a vision of justice across the university (Lloyd, Warner, Baber, & Sollie, 2009).

LIMITATIONS AND FUTURE DIRECTIONS

Several limitations of this study should be discussed. First, this study focused specifically on IHEs that offer at least a 4-year degree. Richards (2016) and Karjane et al. (2002) found that 4-year institutions are generally most likely to comply with federal legislation regarding peer sexual violence among college students and thus are a reasonable place to begin this research. We stress the importance of continued research focused on identifying adopted mandates and best practices concerning sexual assault victimization and their alignment with feminist, victim-centric organizational models at other IHE types including 2-year institutions and those less than 2 years. The contexts of these institutions and the students they serve may require different policies and procedures to ensure that sexual assault is addressed in a manner consistent with feminist approaches.

Second, we utilized data drawn exclusively from IHEs' annual security reports and student handbooks and codes of conduct published on IHE websites. Although Clery mandates

that up-to-date policies and programming be publicly available, it is possible that the student handbooks and codes of conduct available on the websites were not the most recent versions. Also, three IHEs did not have working websites and thus were missing from the analysis. Further, the distinction between policies and practices is important. We examined codified, publically available policies and did not assess the extent to which these had been implemented. Years of research document that laws and policies are not always enforced as they are written, and they are experienced differently by people partly on the basis of their social location (e.g., Calavita, 2010). Further, students may not be aware of or fully understand these policies. For example, reasons given for not reporting a sexual assault to university officials might be related to a lack of information and understanding of current university policy (e.g., students did not know where or to whom to report an assault). Attending to student experiences with these policies, and the ways that the policies are enacted and enforced, is critical for future research on feminist approaches to sexual assault. Even with such limitations, the present research is a step toward understanding university compliance with federal mandates and best practices and the degree to which this compliance may affect victims of sexual assault.

CONCLUSION

Although findings from this study reveal that the majority of IHEs have adopted policies and procedures related to campus sexual assault, results also show that the focus often remains on official reporting and bureaucratic structures, rather than addressing and healing the whole person. Given that both national and state policy agendas focus on refining policies regarding gender-based violence at IHEs, it is important that research continue to unpack the existing mandates and their practical implications for students. There is still much work to do to codify policies that push back against rape myths and to enact mechanisms that ensure that students have avenues for making changes to their IHE's policies and their implications. Feminist scholars must continue to serve as champions on their individual campuses to ensure that well-intentioned policies designed to respond to sexual assault are actually tailored to address the needs of survivors.

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