



March 11, 2024

Dr. Nasser Paydar
Assistant Secretary for Postsecondary Education, Office of Postsecondary Education

Adam Schott,
Deputy Assistant Secretary for Policy and Programs, Delegated the Authority to Perform the Functions and Duties of the Assistant Secretary, Office of Elementary and Secondary Education

U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Request for Information on Sexual Violence at Educational Institutions – Docket No. ED-2023-OPE-0207

Dear Assistant Secretary Paydar and Deputy Assistant Secretary Schott,

On behalf of the American Psychological Association (APA), we are writing to offer public comments on the Request for Information (RFI) on Sexual Violence at Educational Institutions, published in the Federal Register by the Department of Education on January 24, 2024, [Docket No. ED-2023-OPE-0207](#). APA is the nation's largest scientific and professional nonprofit organization representing the discipline and profession of psychology, as well as over 157,000 members and affiliates who are clinicians, researchers, educators, consultants, and students in psychological science. We appreciate the Department's attention to this important issue and the opportunity to provide public comments.

In addition to the response to the questions posed by this RFI, APA strongly supports the Department's proposed Title IX rule on the Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance, which would restore Title IX's purpose, consistent with long-recognized law. It is reflective of psychological science and research, and when finalized will limit underreporting of sexual misconduct, revictimization, and traumatization of survivors, while protecting the due process rights of all parties and for the time, extending Title IX protections based on sexual orientation and gender identity. We urge the Department to expeditiously issue a final rule.

Sexual Violence in U.S Public Schools

As the nation's public schools continue to deal with post-pandemic recovery, including staffing shortages, setbacks in students' academic success, and deficiencies in children's social and emotional development, many are also seeing an increase in sexual violence and misconduct. During the 2020-21 school year, public schools reported over 3,000 incidents of sexual violence, including rape, attempted rape, or sexual assault.ⁱ Recent data also show that during the 2022-23 school year, incidents of unwanted sexual behaviors at Department of Defense Education Activity schools increased by over 80 percent since the 2019-20 school year.ⁱⁱ

In 2021, nearly 9 percent of all students and 11 percent of high school students reported being victims of sexual violence.ⁱⁱⁱ American Indian or Alaska Native, Hispanic, White, and multiracial students were more likely than students from other racial or ethnic groups to experience sexual violence.^{iv} LGBTQ+ students and students who had any same-sex partners were more likely than their peers to have been victims of

sexual misconduct.^v Among female students, 20 percent experienced sexually violent behaviors, a significant increase since 2017, with 14 percent reporting having been physically forced into sex at some point in their lives.^{vi}

Data show that high levels of violence can affect children's development, potentially leading to poorer mental health and other negative outcomes.^{vii} Sexual violence is directly related to trauma, which research has linked to substance use, mental health problems, suicide risk, and chronic illnesses such as heart disease or cancer.^{viii ix} Teenagers who have been sexually assaulted are at risk of academic underperformance, which is also correlated with poor mental health.^x Middle and high school students who report their mental health as excellent are more than twice as likely to say they get excellent grades in school compared with students who rate their mental health as fair or poor.^{xi}

Sexual Misconduct on College Campuses

Sexual misconduct, including sexual assault, is an unfortunately common occurrence on college campuses. Estimates of sexual assaults of college women are remarkably consistent over time, despite efforts to address the problem.^{xii xiii xiv} Surveys regularly show that approximately 15 to 20 percent of college women report experiencing rape or attempted rape during their college career, and that over 50 percent report experiencing some form of unwanted sexual contact. This is despite sexual assault being one of the most underreported crimes.^{xv}

Higher rates of victimization are found among women who are members of historically marginalized sexual and ethnic identities.^{xvi} Women of color report high levels of assault and harassment, with Native American and Alaska Native women at the highest risk.^{xvii} While men can be victims of sexual assault as well, most often perpetrated by other men, it typically occurs at lower rates than women.^{xviii} Transgender and gender non-conforming college students are at significantly higher risk for sexual assault and harassment compared to their cisgender counterparts.^{xix xx} In addition, students with disabilities also report higher rates of sexual violence victimization compared to students without disabilities.^{xxi xxii}

Sexual victimization may negatively impact survivors' mental and physical health. Four out of five rape victims subsequently suffer from chronic physical and/or psychological conditions.^{xxiii} Sexual violence can also have a negative impact on learning and academic success, compromising students' ability to complete college. A reported 34 percent of college students who survive sexual assault drop out.^{xxiv} Experiencing sexual misconduct prior to or during their postsecondary education threatens to hamper or derail student development and success beyond higher education, with potential implications throughout their entire lives.

Given the sheer scale of this problem, APA offers the following responses to the questions posed in this Request for Information, all of which were informed by expert psychologists, including active practitioners and those conducting research in the field.

(1) What factors and best practices should educational institutions consider when establishing sexual assault prevention and response teams, including for online threats, harassment and intimidation, and other forms of technological abuse?

APA recommends that educational institutions take the following steps to improve prevention and response to sexual violence:

Accessibility and availability of resources

- Institute policies that are easily available and accessible to all students and staff and are specific in terms of accountability for the perpetrator and resources for the victim.

- Develop policies that are age-appropriate and understandable for the students, with clear definitions of forms of abuse and examples.
- For younger children, include definitions of abuse associated with sexual relationships between a minor and a person at least 5 years older (and not a minor themselves). Young people also need to be educated about what they might believe is “consensual” relationship but is considered abuse due to power differences, i.e., teacher, minister, etc.
- Create a Title IX/violence support website that includes definitions and examples.

Visibility and accountability

- Create a climate of transparency and accountability surrounding sexual misconduct and reporting. Often, colleges and universities may minimize the prevalence of sexual assault within a student population—for example, by under-reporting and recategorizing incidents as on-campus/off-campus or campus housing/non-campus housing—to potentially distort the degree to which they are responsible as an institution to investigate and respond.

Reporting

- Normalize the anonymous reporting of, and response to, all forms of sexual misconduct by third-party individuals, especially in cases where it may be problematic for the victim/survivor to disclose, e.g., from staff/faculty to students.
- Educational institutions must be mindful of the differences between disclosure, which involves directly and intentionally telling someone about an experience, and reporting, which constitutes asking someone in authority to take official action. Mandatory reporting, without consent, can be harmful to survivors, in a variety of ways, including psychologically, disciplinary, and academically.^{xxv} When implementing mandatory reporting protocols, institutions should be mindful of creating policies that support confidentiality, center the victims’ needs, and provide training to all staff that are deemed mandatory reporters.^{xxvi}

Diversity and representation

- Be mindful of identity and diversity factors such as race, ethnicity, sexual orientation, gender identity, culture and linguistic backgrounds, and ability, and how those factors may change an individual’s risk of experiencing sexual misconduct.
- Engage caregivers and families in conversations about sexual matters with young people. This may include extensive outreach to parents or guardians who might not otherwise understand or who may misinterpret the effort to communicate about sexual matters to their children. Engaging the caregivers/family is an essential component of a comprehensive and effective program. This might entail multiple methods, such as multilingual flyers or through parent-teacher associations.

Awareness of the potential harm caused by inappropriate responses to disclosure

- Negative responses to disclosure of sexual assault, such as victim blaming and stigmatization, are associated with negative mental health outcomes including fear and beliefs about why the sexual assault occurred.^{xxvii} Negative and inappropriate responses can also be a form of betrayal trauma, especially in a place such as a college campus where students are reliant on the institution for safety.^{xxviii}

Increased training for the school/campus community

- Training is an essential component of any school or campus-wide response, not just members of prevention/response teams, but for student orientations and other available school or campus resources. Staff should also be aware of the laws regarding privacy and accessing student information and ensure that student conduct policies include the policies/procedures/expectations

of technology use and campus personnel ability to access such information and under what circumstances.

(2) How can educational institutions best provide survivor resources, including health care, sexual assault kits, sexual assault nurse examiners, culturally responsive and linguistically inclusive standards of care, trauma-informed services, academic supports, and access to confidential advocacy and support services?

Psychological science shows that regaining a sense of control is essential to survivors' recovery.^{xxix} Survivors of sexual misconduct are unlikely to disclose the misconduct when they are distrustful of the process and fearful that it will be confusing, traumatizing, and futile. Thus, they need to be believed, validated, and supported to enhance disclosure, adaptive coping, and control. Approximately 59 percent of victims wait to disclose, and those that do so, typically first talk to their family or friends about their experience.^{xxx}

We suggest that supportive measures offered by institutions include medical and psychological services for survivors to support recovery. Concern for survivors' safety must be central to the proposed options, and survivors should be assured of a well-publicized and accessible pathway to confidential medical and psychological services that support recovery. Instituting such policies would promote the general safety of the entire campus community. Additionally, rehabilitation options should be provided for students who have been found responsible of sexual misconduct but are allowed to remain on campus.^{xxxi} There is a robust and growing body of scientific literature on community engagement and restorative approaches to addressing sexual harassment from which these policies may be drawn.^{xxxii xxxiii xxxiv}

In addition, several other recommendations to consider:

- Schools, school systems, and institutions of higher education should work to develop relationships with local sexual assault and domestic violence organizations. While not every county throughout the nation has one, many do. If none exists, national organizations may also be able to assist. In addition, it may be useful to bring some members from groups providing resources to discuss them at the school or campus, so that students and staff are familiar with them.
- Enable clear pathways for referrals to campus-based and community-based trauma services, including through partnerships with hospital Sexual Assault Forensic Nurse Examiner (SANE or SAFE) teams and local rape crisis centers, which can also have advocates assigned to the schools.
- Incorporate trauma-informed care practices, throughout the school and campus ecosystems, including by hiring school and campus-based mental health professionals with expertise in treating trauma, offering post-traumatic stress disorder treatment, ensuring that services are trauma-informed and rely on trauma-informed pedagogy, which calls upon educators to recognize that their students may have past traumas that affect their ability to succeed in class.^{xxxv}
- Maintain a commitment to a diverse and representative staff, at all levels of student life. Staff that are culturally, linguistically, and regionally responsive can be more conducive to building an environment where all students are more comfortable seeking help.

(3) What best practices should educational institutions consider for responding to and preventing sexual violence and dating violence on their campuses, including the online environment, and which may take into consideration an institution's educational level, size, and resources?

APA strongly supports changes in the proposed Title IX rule that, when implemented, would greatly help schools and institutions of higher education respond to sexual violence and misconduct on their

campuses. This includes expanding the definition of sexual harassment, providing more flexibility for resolving complaints, restoring flexibility to the reporting process, and providing a framework for student support and recovery.

In addition to the recommendations provided in response to question #2, institutions should offer supportive measures to all students who report any type of sexual misconduct, regardless of whether they have requested an investigation or an informal resolution, and even if their complaint is dismissed. Supportive measures could include counseling, extensions of deadlines and other course-related adjustments, and leaves of absence, all of which are non-disciplinary, non-punitive, and at no cost to students. However, it is also important to note that many students facing sexual violence do not want institutional support. Schools and institutions must be flexible enough and have policies in place that can adjust for students' unique needs and circumstances. One such option is peer support services. As with peer support in other settings, such as mental health or substance use, peers must receive evidence-based training and supervision from qualified professionals.

Other factors and recommendations to consider:

- Any prevention strategies and training should spend time on a thorough review of consent, given some of the complexities inherent in real-world consent practices. There are five general principles that should be addressed in any kind of discussion around the issue of consent:^{xxxvi}
 1. Individuals often have multiple objectives.
 2. Decisions about how to communicate consent or non-consent are often sequential and contingent.
 3. Behaviors are often done concurrently, rather than once at a time.
 4. Behaviors used most frequently to show consent are not the same behaviors that are most indicative of consent.
 5. Consent cues are indicators of likelihood, not agreements.
- Self-defense classes can be effective for teaching students at all levels how to prevent violence using verbal and physical tactics. High-quality classes actively engage students in verbal and physical practice of de-escalation, and self-defense when needed. The training occurs in a supportive environment that is adapted to the physical needs of individual students.
- For individuals with diverse sexual orientations and gender expressions, programs that focus on dispelling stigmatizing attitudes, stereotypes, or rape myths (e.g. that sexual orientation or gender identity can be 'corrected;' that some LGBTQ+ individuals are inherently promiscuous and unassailable), and fostering respect for people's identities can both prevent climates that tolerate sexual violence towards LGBTQ+ populations and reduce minority stressors that exacerbate psychopathology following victimization.^{xxxvii xxxviii}
- All the above considerations must also be equally applied to online interactions for students, faculty, and staff, both in terms of educational/professional and personal interactions.
- Additional resources:
 - [National Sexual Violence Resource Center](#)
 - [Rape, Abuse & Incest National Network \(RAINN\)](#)
 - [Black Women's Blueprint](#)
 - [Center for Relationship Abuse Awareness](#)
 - [National Indigenous Women's Resource Center](#)
 - [Stronghearts](#)
 - [StopItNow](#)
 - [Association for the Treatment and Prevention of Sexual Abuse](#)

(4) What factors should be considered as educational institutions develop or implement sex education programs, as appropriate, for students, training initiatives for school staff in sexual violence prevention, and equitably designed and applied discipline models?

In developing and implementing sex education programs and training initiatives for school staff in sexual violence prevention, educational institutions must consider various factors, including race, migration origin, gender, sexual identity, and sexual orientation. Research demonstrates the importance of such intersectionality in contributing to differing rates of sexual violence.^{xxxix} Students of color, especially women, could be disproportionately subjected to various forms of violence. Black women experience intimate partner violence at higher rates than White women, often resulting in more severe consequences.^{xl} Similarly, sexual and gender minority students could encounter higher risks of stalking.^{xli} Moreover, international students, who may face institutional racism, immigration laws, and cultural competence issues within support services, may be vulnerable to increased rates of sexual violence within relationships.^{xlii} These factors contribute to feelings of fear, isolation, and powerlessness.

Therefore, it is essential that training initiatives for school staff in sexual violence prevention address these various factors to ensure equitably designed and applied models for all students in need. Training initiatives for school staff must include an understanding that violence can be experienced differently and have differential outcomes based on different experiences. At the higher education level, training should be provided for residence hall staff, university police, professors, and college counseling centers. Student leadership and other campus organizations should have mandatory training on sexual assault for their memberships.

Additionally, and particularly at the K-12 level, the student's age and parental permission/consent must be considered. The information that is provided must be age-appropriate and integrated into regular classroom activities such as health or physical education.

(5) What are culturally responsive and linguistically inclusive approaches to supporting survivors, which include consideration of race; ethnicity; national origin; limited English proficiency; religion; immigration status; lesbian, gay, bisexual, transgender; queer or intersex (LGBTQI+) status; ability; disability; socio-economic status; exposure to trauma, and other compounding factors?

As has been stated in response to several previous questions, having diverse representation among staff, faculty, and administrators, including racial, ethnic, gender identity, sexual orientation, and disability representation, is critical to supporting survivors from diverse backgrounds. In addition, training on cultural competencies for all staff, that identifies the cultural and linguistic barriers to both reporting instances of sexual violence and seeking and continuing services, must be fully integrated into campus policy. Information about programs should be available in multiple languages, including braille, and interpreters, including ASL, should be readily available during the first contact with a survivor. This should be infused into every aspect of survivor programs, especially in counseling centers, resources centers, and other entities at educational institutions where students who have experienced sexual violence may go for support. Instituting such policies could help survivors from marginalized communities feel more empowered to seek help and disclose instances of sexual abuse and misconduct.

Students/survivors must be listened to and any institutional response to sexual violence or misconduct must be centered on their needs and lived experiences, to avoid further harm or re-traumatization. This is especially true for LGBTQ+ youth. As seen in the above data, this population generally experiences greater stressors and exists at the intersections of multiple forms of oppression. Thus, harassment that may not reach the point of persistently harming other students may more significantly impact LGBTQ+ students. It is important to recognize that “de minimis harm” may be experienced by LGBTQ+

individuals differently compared to other students, so the measure for what is harmful should not be set by non-LGBTQ+ individuals. Therefore, when developing campus harassment and sexual misconduct policies, institutions should include the perspectives of LGBTQ+ students and faculty to ensure that their lived experiences are reflected.

(6) What are promising practices for engaging student groups, community organizations or families of students in efforts to prevent and address sexual violence and dating violence?

- Provide students the opportunities to engage with community organizations focused on violence prevention, such as crisis resource centers and local shelters. Including opportunities for students to learn and volunteer, where they can assist with data collection, presentation of data, literature reviews, and with development of advocacy materials.
- Engage national organizations such as, but not exclusive to, the groups listed in response to question #3. Additional example:
 - [Prepare Inc](#) is part of a national network of evidence-based educational programs, also known as IMPACT Violence Prevention and Resolve. They offer comprehensive violence prevention education for personal safety, communication skills, anti-bias/bullying, sex/sexuality education, substance use prevention, and self-defense. Their programming is tailored for various audiences, including young people, faculty/administrator, and families.
- Develop workshops for students and staff, in smaller settings where they can be more engaged.
- Schools and campuses can also work to better enhance education around healthy sexuality and rules of consent; initiate and provide space for supervised, age-appropriate student-led discussions on sexual health and sexual misconduct; make survivor supportive services visible and easily accessible; and include treatment services for those who perpetrate sexual harm.

When working with younger students, all efforts must include outreach to parents, guardians, and/or families. For some ethnic and racial groups, especially recent immigrants or those from strict religious backgrounds, family engagement is an especially effective way to reduce resistance, ensure better outcomes, and create culturally appropriate materials.

(7) In what ways can the Federal Government support educational institutions in improving the prevention of, and response to, sexual violence and dating violence, including online threats, harassment and intimidation, and other forms of technological abuse?

As mentioned, several times throughout this response, the most immediate thing the federal government can do is to as quickly as possible release a final Title IX rule. In addition, increased funding for schools and institutions of higher education is highly needed, for programming related to sexual violence and sexual misconduct prevention, improving school and campus climate, and increasing access to support and services for survivors. Stronger investments must also be made in research and data collection. The Department should support increased funding for the following programs in all future budget requests to Congress.

At the K-12 level, the Department of Education's Office of Safe and Supportive Schools supports a variety of programs which aim to prevent and address school violence, expand access to school-based mental health services, and improve school climate. This includes Project Prevent and Project Serv, the Mental Health Service Professional Demonstration Grant and School-Based Mental Health Services Grant Programs, and the Student Support and Academic Enrichment Program (Title IV-A). In addition to increased funding for these programs, the Department should improve upon efforts to provide schools and districts with technical assistance, and issue expanded guidance on Project Prevent and Project Serv's applicability to instances of sexual violence in educational settings.

Community schools also have a proven record of improving school climate and safety, community/school relations, and family engagement. Increasing funding for the Department of Education's Full-Service Community Schools Program will allow for the expansion of community schools in more school districts throughout the country. Additionally, the Substance Abuse and Mental Health Services Administration (SAMHSA) and the Centers for Disease Control and Prevention both support programs that aim to address the physical and psychological health and well-being of youth, including related to trauma and adverse childhood experiences, e.g., Project AWARE, the National Child Traumatic Stress Initiative, and the Division of Adolescent and School Health. These programs should also receive additional funds.

On the higher education side, fewer federal programs exist to help colleges and universities address campus wellness, safety, and mental health. Institutions of higher education are also eligible for Project Serv, which further underscores the need for increased funding for that program. SAMHSA's Garrett Lee Smith (GLS) Campus Suicide Prevention Grant Program is the only federal program solely dedicated to comprehensively addressing suicide prevention and mental health at institutions of higher education. However, despite its evidence of success and the demonstrated needs across college campuses, GLS remains a small program that is only able to fund a fraction of institutions, nationwide. Increased funding is critically needed.

In addition, the Department should consider utilizing the Fund for the Improvement of Postsecondary Education (FIPSE) to address the prevention of all types of violence on campus as well as to increase supports and services to students who experience violence. APA supports the proposed \$150 million for college mental health through FIPSE, as part of the President's FY 2024 request, and urges the Department to continue including this provision in future budget requests. Like the school-based mental health grants overseen by the Department, we encourage you to support the creation of a permanent college campus-based mental health service program within FIPSE.

As it pertains to online threats, harassment and intimidation, and other forms of technological abuse, we encourage the adoption of recommendations in the [APA health advisory on social media use in adolescence](#).

If you are aware of any supportive research (qualitative or quantitative) or promising practices, please include citations, websites, or other information that will enable the Task Force to learn more.

- **Mandated supporting rather than mandated reporting policies:**
 - Holland, K. J., Cipriano, A. E., Goodman-Williams, R., & Diede, A. S. (2021). Examining support for university-to-police reporting policies for sexual assault: the role of survivors' consent. *American Journal of Community Psychology*, 68(3-4), 440-454.
 - Holland, K. J., Cipriano, A. E., & Huit, T. Z. (2020). "The fear is palpable": Service providers' perceptions of mandatory reporting policies for sexual assault in higher education. *Analyses of Social Issues and Public Policy*, 20(1), 66-89.
- **Addressing sexual violence among women of color:**
 - Bryant-Davis T, Ullman SE, Tsong Y, Tillman S, Smith K. Struggling to survive: Sexual assault, poverty, and mental health outcomes of African American women. *Am Orthopsychiatry* 2010;80:61–70
 - Gomez J. M. (2023) *The Cultural Betrayal of Black Women and Girls: A Black Feminist Approach to Healing From Sexual Abuse*: American Psychological Association
 - Monford Dent, T. (2023) *Culturally Informed Work with Black Women Survivors: Training & Self-Inquiry Manual*.

- Slatton, Brittany & Richard, April. (2020). Black Women's experiences of sexual assault and disclosure: Insights from the margins. *Sociology Compass*. 14. 10.1111/soc4.12792.
- Tillman, S., Bryant-Davis, T., Smith, K., & Marks, A. (2010). Shattering Silence: Exploring Barriers to Disclosure for African American Sexual Assault Survivors. *Trauma, Violence & Abuse*, 11(2), 59–70. <https://www.jstor.org/stable/26638071>
- West, CM & Johnson, K. (2013). Sexual Violence in the Lives of African American Women. (March 2013). Vawanet.org.
- **Other resources:**
 - Kirk-Provencher, K. T., Spillane, N. S., Schick, M. R., Chalmers, S. J., Hawes, C., & Orchowski, L. M. (2023). Sexual and Gender Minority Inclusivity in Bystander Intervention Programs to Prevent Violence on College Campuses: A Critical Review. *Trauma, Violence, & Abuse*, 24(1), 110-124. <https://doi.org/10.1177/15248380211021606>
 - Basile KC, Smith SG, Kresnow M, Khatiwada S, & Leemis RW. (2022). The National Intimate Partner and Sexual Violence Survey: 2016/2017 Report on Sexual Violence. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention
 - Gutowski, E. R., Freitag, S., Zhang, S., Thompson, M. P., & Kaslow, N. J. (2023). Intimate Partner Violence, Legal Systems and Barriers for African American Women. *Journal of interpersonal violence*, 38(1-2)
 - Kane, Odia, "The Denial of Black Victimhood: Examining Attitudes of Sexual Assault and Victim-Blaming on a College Campus, A Continued Analysis" (2020). Master's Theses. 1507.
 - National Sexual Violence Resource Center (2021). Back to Basics: Partnering with Survivors and Communities to Promote Health Equity at the Intersections of Sexual and Intimate Partner Violence.

APA appreciates the opportunity to provide public comments. If we can be of further assistance, please contact Kenneth Polishchuk, Senior Director for Congressional and Federal Relations & Education Policy Lead, at kpolishchuk@apa.org.

Sincerely,



Katherine B. McGuire
Chief Advocacy Officer



Catherine Grus, PhD
Chief Education Officer

ⁱ Office for Civil Rights. (2023). *2020-2021 Civil Rights Data Collection (CRDC): Sexual Violence and Sex-based Harassment or Bullying in U.S. Public Schools During the 2020-2021 School Year*. U.S. Department of Education. <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-sexual-violence-snapshot.pdf>

ⁱⁱ Government Accountability Office. (2024, February 13). *K-12 Education: DOD Has Taken Steps to Support Students Affected by Problematic Sexual Behaviors, but Challenges Remain* (Report no. GAO-24-106182). <https://www.gao.gov/products/gao-24-106182>

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- ^{xv} Department of Justice, Office of Justice Programs, Bureau of Justice Statistics, National Crime Victimization Survey, 2016-2020 (2021).
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