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Graduation year

2018

Major

Public Policy

Project title

Fostering Institutional Accountability in Higher Education: Examining Sexual Misconduct at the University of Chicago

Project description

Although Title IX and Clery Act legislation specifically aims to prevent sexual violence on college campuses, the problem remains persistent and pervasive. According to RAINN, “among undergraduate students, 23.1% of females and 8.4% of males experience sexual assault through physical force, violence or incapacitation.1” My research examines institutional accountability for sexual misconduct, conducting a case study into one representative bureaucracy: the University of Chicago. I evaluate the University’s current policy and implementation ability, and find that organizational decoupling is a barrier to accountability for sexual misconduct. I then recommend structural, marketing, and area-specific solutions that ameliorate institutional accountability such that sexual violence against undergraduates may be reduced in the future.

Project affiliation (BA thesis, capstone, independent research, etc)

BA Thesis

Name and Department of course instructor/faculty supervisor for project

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Fostering Institutional Accountability in Higher Education: Examining Sexual Misconduct at the University of Chicago

By: Sarah McNeilly

A thesis submitted for partial fulfillment of the requirements of a
Bachelor of Arts in Public Policy Studies at
The University of Chicago
April 18, 2018
Preceptor: Yaqub Hilal
Second Reader: Sorcha A. Brophy, Ph.D.

Abstract

Although Title IX and Clery Act legislation specifically aims to prevent sexual violence on college campuses, the problem remains persistent and pervasive. According to RAINN, "among undergraduate students, 23.1% of females and 8.4% of males experience sexual assault through physical force, violence or incapacitation.[1]" My research examines institutional accountability for sexual misconduct, conducting a case study into one representative bureaucracy: the University of Chicago. I evaluate the University's current policy and implementation ability, and find that organizational decoupling is a barrier to accountability for sexual misconduct. I then recommend structural, marketing, and area-specific solutions that ameliorate institutional accountability such that sexual violence against undergraduates may be reduced in the future.

[1] "Campus Sexual Violence: Statistics." *RAINN*, www.rainn.org/statistics/campus-sexual-violence. (Statistic taken from: David Cantor, Bonnie Fisher, Susan Chibnall, Reanna Townsend, et. al. Association of American Universities (AAU), Report on the AAU Campus Climate Survey on Sexual Assault and Sexual Misconduct (September 21, 2015).)

Fostering Institutional Accountability in Higher Education:
Examining Sexual Misconduct at the University of Chicago

I. Introduction

Problem Statement

The bureaucratization of American higher education has brought substantial changes, particularly to university administrations (for which bureaucratization is key to functionality)[2]. A hallmark of bureaucracy is the creation of specific, designated offices and roles within a larger hierarchy of power. While sociologists like Weber have lauded bureaucracies for their order, objectivity and efficiency[3], modern bureaucracies are not without their struggles.

One challenge for modern bureaucracies, including bureaucratized institutions of higher education, is institutional accountability. Institutional accountability refers to the various expectations stakeholders have of their institutions; in this case, expectations that students, faculty and trustees (among others), have of university administrations[4]. Because bureaucratized universities often have complex, decentralized organizational hierarchies, it can be difficult to hold administrations accountable. Though numerous problems with institutional accountability in bureaucratized universities exist, the remainder of this paper will focus on the relationship between bureaucratized higher education, accountability and sexual misconduct.

The Rape, Abuse and Incest National Network (RAINN) asserts that 54% of sexual assault survivors are between the ages of 18-34. College-aged students are far more likely to be the victims of sexual assault: an estimated 23.1% of females and 8.4% of males experiencing sexual assault through physical force, violence or incapacitation during their studies. Equally as

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[2] Page, Charles H. "BUREAUCRACY AND HIGHER EDUCATION." *The Journal of General Education*, vol. 5, no. 2, 1951, pp. 91–100. *JSTOR*, JSTOR, www.jstor.org/stable/27795337.

[3] "XI: Bureaucracy." *Economy and Society*, by Max Weber, Univ. of California Press.

[4] Kearns, Kevin P. "Institutional Accountability in Higher Education: A Strategic Approach." *Public Productivity & Management Review*, vol. 22, no. 2, 1998, pp. 140–156. *JSTOR*, JSTOR, www.jstor.org/stable/3381030.

troubling as the prevalence of sexual assault is the fact that crimes are widely underreported: "only 20% of female student victims, ages 18-24, report to law enforcement[56]."

Policy to combat sexual assault and harassment exists by way of four major pieces of legislation: the Higher Education Act (HEA), the Clery Act, the Violence Against Women Act (VAWA), and Title IX. These laws ensure that higher education institutions create policy surrounding sexual assault and harassment crimes. Moreover, they govern campus prevention programming, support resources, reporting requirements and disciplinary proceedings, setting a minimum standard for all higher education institutions. Though colleges and universities are tasked with creating their own nationally-compliant policies, individual violations may be reported to the United States Department of Education[7].

Despite the adoption of Title IX on college campuses nationwide, the policy has failed to eradicate sexual misconduct. Students continue to experience harassment and assault and frequently fail to report crimes, oftentimes citing a lack of trust in the system. This paints a haunting portrait: college students face the persistent and pervasive threat of sexual misconduct despite the existence of national, state and institutional legislation to combat the issue. This cognitive dissonance indicates that adhering to minimum policy standards alone is insufficient to protect students. The bureaucracies involved in implementing these policies play a hand in their success; therefore, improving institutional accountability for sexual misconduct could enhance policy success.

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5 *RAINN*, "Campus Sexual Violence: Statistics," n.d., www.rainn.org/statistics/campus-sexual-violence.

6 Department of Justice, "Rape and Sexual Victimization Among College-Aged Females," *2014.*

7 Clery Center, "Know Your IX," n.d, https://www.knowyourix.org/college-resources/clery-act/.

Statement of Purpose

The problem of institutional accountability for sexual misconduct is ubiquitous in bureaucratized higher education. By representing one such bureaucracy, the University of Chicago provides a valuable case study. This thesis analyzes the University of Chicago, discussing institutional accountability as it relates to sexual misconduct. I focus on how organizational decoupling, defined as instances in which "organizations abide only superficially by institutional pressure and adopt new structures without necessarily implementing the related practices," creates disparity between formal policy and actual implementation (Boxenbaum and Jonsson, 80-81).

To begin, I characterize the University of Chicago as an organization facing similar struggles as countless others. To accomplish this, I compare the University of Chicago's published "Policy on Discrimination, Harassment and Sexual Misconduct" to national and state standards, finding that the University is compliant. Its compliance proves that the University of Chicago meets or exceeds the minimum standards and affirms its typicality: higher education institutions are rarely found to be non-compliant.

Next, I prove that sexual misconduct remains a persistent problem for the University. I provide 10 years of Annual Security & Fire Safety Report data and data from the 2015 Campus Climate Survey, which affirms that sexual misconduct exists. Therefore, the University of Chicago can be treated as a representative bureaucracy at which sexual misconduct persists despite formal policy compliance, signaling the existence of organizational decoupling and a lack of institutional accountability.

To analyze the nature of this problem, I begin with an organizational analysis of the University of Chicago administration, discussing its ability to implement University Policy. I contextualize analysis by conducting a literature review to benchmark the University against peer

institutions[8]. Then, I present data from in-depth administrator interviews and student focus groups that delves deeper into policy, resources, procedures and improvements. The sum-total of this evidence is used to compile recommendations for improving the University of Chicago's policy and implementation ability in four major areas. In the culmination of this thesis, I present recommendations to the University of Chicago's Office of the Provost, which houses both Campus and Student Life and The Office for Equal Opportunity Programs, the two major implementers of sexual misconduct policy, resources and prevention.

Terminology

I, along with the University of Chicago, will use State of Illinois Criminal Code definitions of sexual abuse, sexual assault, rape, domestic violence, dating violence, stalking and other related crimes[9]. I define sexual misconduct as any crime that encompasses all forms of sexual violence as well as sexual harassment, stalking, and domestic and dating violence crimes that do not include the use of physical force[10]. Throughout this paper, I will use the words complainant, victim and survivor interchangeably to describe anyone who has experienced sexual misconduct. I will also use "Title IX" and TIX interchangeably. For the purposes of this study, I focus only on sexual misconduct crimes that occurred on the University's main undergraduate campus in Hyde Park, Chicago IL.

[8] Based on conversations with University of Chicago administrators, peer institutions are considered to be "Ivy-Plus" schools, including all Ivy league schools but Penn and Dartmouth, plus Stanford, Duke, MIT and Northwestern.

[9] The University of Chicago, "Student Manual," 2017, studentmanual.uchicago.edu/page/policy-unlawful-discrimination-sexual-misconduct.

[10] These crimes are included in this definition because all forms of sexual misconduct are gender-based discrimination that should not be tolerated in the University of Chicago campus community.

II. Literature Review

Rational Systems, Bureaucracy and Higher Education

Government efforts to reform American higher education employ a "rational systems" perspective, which assumes that bureaucratization will "inevitably lead to program implementation and achievement of the program's goals," (Seidman, 399). Bureaucratic social organizations are marked by the specification of roles and duties that can be organized hierarchically. Each office and person within a hierarchy contains competencies that correspond to responsibilities that must be fulfilled. In "Bureaucracy and Higher Education," Charles Page traces broad trends in bureaucratization, pointing out features that are especially relevant to the bureaucratization of higher education[11]. The first feature is standardization, which extends beyond technological systems to include "administrative techniques, human operations, [and] human beings," (Page, 93). The relationship between standardization and bureaucratic authority is described by Robert K. Merton, who states that in bureaucracy, "authority, the power of control which derives from an acknowledged status, inheres in the office and not in the particular person who performs the official role[12]." Applying this logic, university administrations wield power while individual administrators do not, precisely because personnel can be interchanged to best suit the desires of a bureaucracy.

Page describes additional trends in bureaucratization: the "diminution of spontaneity" and the ability to serve some "client-public". As bureaucrats become experts in their roles, they often develop a "bureaucratic viewpoint," in which the bureaucrat "develop[s] antipathy toward the inexpert clients whom the organization serves (Page, 94)." This viewpoint is not officially sanctioned by the doctrine of a bureaucracy: rather, official doctrine often "loudly proclaim[s]

[11] Charles H. Page, "Bureaucracy And Higher Education" (Journal of General Education: 1951) 91–100.

[12] R. K. Merton, "Bureaucratic Structure and Personality," (Social Forces: 1940), 561-68.

responsibility to those they serve," (Page, 94). By considering these phenomena in higher education, one can identify a rift between students (the client-public) and university administrations (the bureaucratic authority/viewpoint); this rift imposes unique barriers to developing institutional accountability and creating organizational change. The derivation of bureaucratic authority means that dissatisfied students can reckon with administrators but not administrations, limiting a student's access to the hierarchy of power and therefore their ability to incite change. Moreover, administrators sometimes adopt bureaucratic viewpoints wherein they develop antipathy, patrionization, or ambivalence toward their student client-public. Still, those administrators who manage to shirk the bureaucratic viewpoint still possess a limited ability to access power because their livelihood remains tied to cooperation with the hierarchy: even the highest-ranking actors can be replaced to suit a collective will. Even when all of these factors are overcome and a university administration endeavors change, the inherent aversion to spontaneity within bureaucracies limits the pace of progress. These phenomena are particularly troubling in the context of fostering accountability for sexual misconduct in higher education.

Institutional Accountability in Higher Education

Institutional accountability rests upon the assumption that a bureaucracy is not only able, but required, to serve its client-public. In "Institutional Accountability in Higher Education," Kearns notes that universities are unique because they serve so many different client-publics[13]. However, diverse interest groups— students, alumni, staff, faculty, donors, trustees— can lose bargaining power with bureaucracies that view some demands as "at best, negotiable, whereas others should be ignored altogether or vigorously resisted," (Kearns, 141). The bargaining power of a client-public depends on whether an institution feels beholden to that group. By its narrowest definition, institutional accountability requires only three core features:

[13] Kevin P. Kearns "Institutional Accountability in Higher Education: A Strategic Approach." (Public Productivity & Management Review: 1998) 140–156.

A. *A higher authority vested with the power of oversight,*
B. *An explicit reporting mechanism for conveying information to the higher authority, and*
C. *A measure or criterion used by the higher authority to assess compliance by subordinate institutions (Kearns, 144).*

Applying this view of institutional accountability to collegiate sexual misconduct, university administrations are definitively accountable to their ruling authority— the United States Department of Education— but not to students or other interest groups[14]. However, broader definitions of institutional accountability construct an agency relationship between university administrations and students. By defining accountability as "responsiveness to societal demands, anticipation of societal needs, and adherence to personal and professional standards of conduct," institutional accountability can require both reactive responses to demands and proactive actions that engender public trust (Kearns, 144) .

Constructing dimensions of accountability aids analysis. Kearns constructs a framework involving two dimensions:

1. *"A set of accountability standards— explicit or implicit— generated by internal or external stakeholders, and*
2. *A response to these accountability standards— tactical or strategic— from inside the institution," (Kearns, 147).*

Superimposing these dimensions creates the following matrix[15]:

Organizational response	**Explicit standards of performance and accountability**	**Implicit standards of performance and accountability**
Tactical	Legal Accountability- Compliance	Negotiated Accountability- Responsiveness
Strategic	Anticipatory Accountability- Advocacy	Discretionary Accountability- Judgement

University accountability for any issue can be evaluated across this matrix[16]. It is important to note, that some dimensions are more relevant for particular issues: performance in negotiated accountability tends to be most important for sexual misconduct.

[14] The accountability mechanism between the U.S. Department of Education and higher education institutions is explained later in this section.
[15] Kearns 147.

An apparent lack of institutional accountability, therefore, can arise when a university does not claim—publicly or privately— to be accountable to students. It is most common for a university to publicly project that it values accountability to students, and fail to demonstrate that accountability later on. (Information asymmetry prevents us from knowing whether any administration or administrator actually values accountability, or simply its appearance.) In any case, the extent to university can be evaluated using Kearns' matrix to create a more nuanced understanding of strengths and weaknesses.

Organizational Decoupling as an Accountability Barrier

Organizational decoupling describes the disparity between formal policy and actual implementation that interferes with the fulfillment of a policy or program's intent. This disruption, in turn, impedes the production of a desired social outcome[17]. When organizational decoupling interferes with the ability of an institution to create a desired social outcome, and that institution ignores (or fails to notice) decoupling, a lack of accountability is observed.

In this review, the University's "Policy on Harassment, Discrimination and Sexual Misconduct" is the formal policy from which organizational decoupling occurs, thereby impacting the ability to eradicate sexual misconduct. Thus, institutional accountability is lost when the University of Chicago notices that its policy does not significantly reduce sexual misconduct and does not ameliorate its policy, implementation or both.

Government Reform and Collegiate Sexual Misconduct

There is a large body of legislation relating to sexual misconduct and violence prevention that falls under the broad umbrella of Title IX. Title IX arose out of the Higher Education Act, and requires that any college or university receiving federal financial aid be compliant with

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[16] An institution that demonstrates legal accountability, for example, may fail to show satisfactory anticipatory, negotiated or discretionary accountability, and therefore fail to achieve full institutional accountability.

[17] This assertion recalls principles from Seidman's discussion of rational systems in education.

policies that prohibit discrimination on the basis of sex, protecting individual citizens against gender-based discrimination[18]. This provides the regulatory mechanism for federal compliance with Title IX and related legislation: when a University is reported for noncompliance, federal investigation ensues. If a university is found noncompliant, it is stripped of federal financial aid[19]

Although equality and safety in education were stated focuses of the Higher Education Act and the Title IX amendments, neither law refers explicitly to sexual violence. Impetus for legislation that explicitly combated sexual assault came after the rape and murder of Jeanne Clery at Lehigh University in 1987. In 1998, the Crime Awareness and Campus Security Act was passed, attempting to improve upon Title IX by promoting transparency about campus safety and and support for sexual violence victims[20]. The law is now known as the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, or simply the Clery Act. In 1994, the Violence Against Women Act (VAWA) established the federal legal definitions for domestic and dating violence, sexual assault and stalking, expanding and solidifying the scope of Title IX and Clery Act laws. Moreover, VAWA made grant funding available to higher education institutions to reduce these crimes[21].

Despite the additional provisions under the Clery Act and VAWA, sexual violence and harassment continued in the new millennium. Additional policy recommendations from the Department of Education's Office of Civil Rights attempted to address these problems: it created protections for whistleblowers, recommended the appointment of a Title IX coordinator, and ultimately lead to the 2013 Campus Sexual Violence Elimination (SaVE) Act. Campus SaVE,

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[18] United States Department of Labor, "Title IX, Education Amendments of 1972," *n.d.*

[19] This regulatory mechanism embodies the rational systems perspective which assumes that evaluations and subsequent sanctions "drive program participants to implement a program's intent… which in turn [produces] desired social outcomes". In this case, fear of federal investigation and subsequent denial of financial aid should inspire proper implementation, thereby mitigating sexual assault (Seidman, 399).

[20] Clery Center For Security On Campus, "Legislative History," *n.d.*

[21] Federal Register, "Violence Against Women Act," (National Archives and Records Administration: 2014).

the most recent Title IX amendment, required sexual violence prevention education by establishing the need for primary prevention and awareness programs in higher education[22].

Sexual Misconduct Policy at University of Chicago

The University of Chicago's Title IX policy, titled the "Policy on Harassment, Discrimination and Sexual Misconduct," is published in its Student Manual and revised annually. For the purposes of this paper, I will use this full title and the shorthand "University Policy" interchangeably. The most recent University Policy affirms in its introduction that "sexual misconduct may violate the law, does violate the standards of our community, and is unacceptable at the University of Chicago," noting that University Policy "conforms to legal requirements" and seeks to create an environment free from sexual misconduct[23]. In Appendix I, I have included a checklist comparing University Policy to the aforementioned legislation pertaining to campus sexual violence[24]. The checklist evidences that the University of Chicago's "Policy on Harassment, Discrimination and Sexual Misconduct" meets the minimum standard set forth by the Department of Education.

III. Methodology

Assessment of sexual misconduct policy and implementation at the University of Chicago requires a mixed-methods approach. Whereas establishing that the University of Chicago has a sexual misconduct problem relies on quantitative data from Annual Security Reports and the 2015 Campus Climate survey, understanding the reasoning behind this problem requires qualitative input. Together, these data provide insight into policy and implementation issues that underlie and exacerbate the prevalence sexual misconduct at the University of

22 Campus Save Act, "The Campus Sexual Violence Elimination Act of 2013", *n.d.*, http://www.campussaveact.org/.

23 Student Manual.

24 This checklist was developed by Patricia McMahon, in conjunction with the National Institute of Justice, to assist institutions of higher education to benchmark campus policy compliance with federal laws directed at sexual assault. It is important to note that these policies are a minimum standard, and do not reflect provisions included in the Obama Administration's *Dear Colleague* letter in 2011. This is in part because McMahon's review predates this letter, and in part because the standards set forth by the *Dear Colleague* letter are subject to change under a new presidential administration.

Chicago. Further, these data gather recommendations from internal and external interest groups, ensuring that policy recommendations will be relevant, feasible and effective.

Problem Establishment

I begin by presenting data regarding the prevalence of sexual misconduct at the University of Chicago. To do this, I present data from the University's Annual Security and Fire Safety Reports (ASR)[25] to provide an initial assessment of the problem. Because figures regarding sexual misconduct are so often mis- or under-reported, I supplement ASR data with data from the 2015 Campus Climate Survey[26], which captures student attitudes and behaviors. Together, these data affirm the existence of sexual misconduct at the University of Chicago, and reveal a lack of student confidence in the administration.

Organizational Analysis

The "Policy on Harassment, Discrimination and Sexual Misconduct" outlines primary implementers and all related University resources: legal, medical, procedural, disciplinary and educational. These parties are discussed in the Policy's Sections VII, VIII, IX, X and Appendix I. University Policy refers to the ASR for a full outline of prevention education services and to external links for personnel lists for various panels, boards and organizations[27]. I employ all of these resources, in addition to information available on the University's website, to create a comprehensive hierarchy of individuals and offices involved in the creating and implementing University Policy. This hierarchy is then broken out into lists that provide a brief overview of each administrator's stated role and responsibilities. Organizational analysis provides a reference point for subsequent peer benchmarking and administrator interview data.

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25 University of Chicago, *Annual Security & Fire Safety Report*, 2007-2017.

26 Jake Bartolone, "*Spring 2015 Climate Survey*," (NORC: 2015).

27 Student Manual.

Peer Institution Benchmarking

A literature review gathers evidence from peer institutions regarding sexual misconduct best practices. During internal benchmarking, the University of Chicago identifies the following group of peer institutions: Harvard University, Princeton University, Yale University, Columbia University, Stanford University, Massachusetts Institute of Technology (MIT), Brown University, Cornell University. Data from these eight universities was compiled and compared to this University, paying particular attention to staffing levels and structures. Ultimately, this data evidences that the University of Chicago is comparatively under-resourced, and identifies some best practices, whose merit is discussed in my recommendations.

Administrator Interviews

Next, I present data from in-depth interviews with University of Chicago administrators. Because these individuals careers' are dedicated to implementing Title IX policy, they are well-versed in University Policy and its implementation challenges; therefore, interview data informs proposed recommendations and their feasibility. Ten of the twelve administrators outlined in the organizational analysis chart were contacted via email to request participation. (Diermeier and Zimmer were not.) Of these contacts, six administrators agreed to participate: Michele Rasmussen, Jeremy Inabinet, Shea Wolfe, Mario Polizzi, Belinda Vasquez and Vickie Sides. All administrators participated in one-on-one interviews, with the exception of Polizzi and Vasquez, who requested to interview together. All administrator interviews attempted to answer the set of questions included in Appendix II.

At the start of every hour-long interview, a request to voice record the interview was made. Because of confidentiality concerns, two interviewees did not consent to being recorded; in these cases, interviews were transcribed in real-time. After transcription was complete, all audio files were destroyed. Interview transcripts were then analyzed using an inductive coding scheme. These data discuss the administration's priorities, present existing challenges

surrounding sexual misconduct prevention and resources, desired changes to the University's system. Each data table lists the number of administrators who shared the idea or sentiment. To ensure accuracy, theme tables were shared with interview participants, who were permitted to review and propose edits.

In-depth interviews provide two major opportunities: to inform proposed recommendations, and to build rapport with University administrators to encourage their review of this report.

Student Focus Groups

Assuming information asymmetry between the University's administrators and students, I conducted student focus groups that identified additional shortcomings and gathered recommendations. Focus group data aids in characterizing issues with institutional accountability and allows recommendations to incorporate student desires and best-case scenarios. This presents a unique opportunity to not simply rectify existing inadequacies, but to suggest changes to the system that would make the University of Chicago exemplar in the eyes of its students. Further, because administrators cited a lack of student feedback as a barrier to progress, focus groups provide much-needed feedback, even if a small amount.

Undergraduate students were recruited to focus groups both online and in-person. Invitations were posted in University of Chicago class Facebook groups, of which a majority of students in each class are part. Additional invitations were spread using snowball recruitment strategy: invitations were shared with friends and classmates, who disseminated advertisements throughout various Facebook groups. This tactic sought to personalize the invitation while spreading it throughout multiple social networks.

Focus groups are limited with respect to their generalizability: they normally encompass no more than 12 people, which is just a fraction of the University's 5600+ undergraduate

students. (Three total focus groups were conducted with 18 total participants). Therefore, it was important to ensure that focus groups were demographically similar to the overall student body. To accomplish this, each focus group participant completed an exit survey at the conclusion of focus group discussion. This survey gathered demographic data to ensure equal representation by gender, age and race. Further, the survey re-administered questions from the 2015 Campus Climate Survey to determine that the cohort was not biased for or against the administration. Comparing exit survey results with Campus Climate data confirms that these 18 focus group participants were a reasonably representative sample of the undergraduate student body[28]. Focus group demographics are included in Appendix IV.

Focus group questions were designed using the "4-D Model for Appreciative Inquiry.[29]" Appreciative inquiry is a theory of organizational change that approaches organizational issues, challenges and concerns by framing change in a positive, motivating light. Coghlan, Preskill and Catsambas summarize the 4-D Model's approach[30]:

> *"Instead of focusing on problems, organizational members first discover what is working particularly well in their organization. Then, instead of analyzing possible causes and solutions, they envision what it might be like if "the best of what is" occurred more frequently. Here participants engage in a dialogue concerning what is needed, in terms of both tasks and resources, to bring about the desired future. Finally, organization members implement their desired changes. A common underlying assumption of problem-solving approaches is that organizations are served best by identifying and removing their deficits. In contrast, Appreciative Inquiry argues that organizations improve more effectively through "discovery and valuing, envisioning, dialogue and co-constructing the future" (Ashford and Patkar, 2001, p. 4)."*

Using this model, focus group participants identify ways in which institutes of higher education (specifically, the University of Chicago) prevent, protect against and respond to sexual misconduct. Participants then envision success in prevention, protection and response, and picturing an ideal scenario. This ultimately encourages participants to make inspired suggestions

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[28] Exit surveys did not collect any identifying information from student participants, and serve the sole purpose of confirming data validity.

[29] Coghlan, Annie T, et al. "An Overview of Appreciative Inquiry in Evaluation." *New Directions for Evaluation*, no. 100, 2003, www.rismes.it/pdf/Preskill.pdf. Wiley Periodicals, Inc.

[30] Annie T Coghlan, et al. "An Overview of Appreciative Inquiry in Evaluation." (*New Directions for Evaluation*: 2003).

for administrative improvement. Use of the 4-D Model ensures that focus groups are a productive opportunity to shape policy and implementation, rather than a forum to air grievances without suggesting improvements. Focus group questions are included in Appendix II[31].

Each of the three focus groups were recorded, transcribed and coded using an original, inductive coding scheme. Themes and key phrases were developed during review of focus group transcripts based and are presented in theme tables. To protect participants' identities, input is marked only by focus group number *(FG1, FG2, FG3).*

IV. Data and Analysis

Prevalence of Sexual Misconduct at the University of Chicago

Between 2006 and 2016, the University of Chicago reported 279[32] sexual misconduct crimes, including 52, 61 and 86 in 2014, 2015 and 2016 respectively[33]. Although Clery Act reports do not encompass all, or nearly all, of all instances of sexual misconduct, these data confirm the presence of sexual misconduct at the University of Chicago. Because crimes are often underreported, it is difficult to definitively state whether sexual misconduct is more or less prevalent at the University of Chicago compared to its peers or national averages; rather, this data intends to demonstrate that sexual misconduct persists here.

Data from the 2015 Campus Climate Survey, conducted by the National Opinion Research Center (NORC), reaffirms the existence of sexual misconduct while identifying under-reporting. For example, whereas 16.6 percent of female respondents said they had been "watched from afar or were followed by someone", only 1.3 percent of officially reported it[34]. This trend holds across various harassment crimes and between both genders, demonstrating the prevalence

[31] The nature of these questions revolved around University policy, practices and resources and aimed primarily to identify additional weaknesses and gather recommendations. Therefore, focus groups were of minimal risk to participants.
[32] Complete data available in Appendix III..
[33] Increases in reported crimes do not suggest increased prevalence of all crime, but instead are thought to reflect improvements in reporting requirements and/or student trust.
[34] Full data in Appendix II.

of both harassment and underreporting. Other survey data capture the prevalence of other forms of sexual violence. Among female undergraduate respondents, 52.0% reported having some unwanted sexual experience, including 20.5% who experienced non-consensual kissing, 35.5% who experienced non-consensual touching and 9.8% who experienced non-consensual vaginal or anal penetration[35]. Among male undergraduate students, 20.5% reported having some unwanted sexual experience, including 8.9% who experienced non-consensual kissing, 12.8% who experienced non-consensual touching and 3.0% who experienced penetrative rape[36].

The Campus Climate survey also sheds light on student concerns about reporting among sexual misconduct, as summarized in Table 1.

Table 1. Concerns about sharing or reporting among respondents experiencing at least one incident of sexual misconduct and/or sexual assault[37], by gender in the University system of record

Statement	% Agreed, Female Experiencing Misconduct	% Agreed, Female Experiencing Assault	% Agreed, Male Experiencing Misconduct	% Agreed, Male Experiencing Assault
Did not know who I should tell	19.7	51.0	15.7	N/A
Did not know where to go to report	20.0	36.5	11.1	N/A
Afraid of retaliation by person who did it or others	17.4	46.4	9.8	N/A
Did not think it was serious enough to share	91.6	83.3	83.7	84.2
Lack of proof that incident happened	35.8	57.3	26.1	42.1
Fear of being treated with hostility by the person I would tell	13.7	23.3	8.5	N/A
Fear of being blamed or not believed by the person I would tell	19.2	45.3	15.7	36.8
Did not want any action to be taken (i.e. arrests, legal charges, disciplinary action)	56.3	71.9	52.3	81.6
Didn't think the University of Chicago administration would do anything	39.9	58.3	28.1	34.2

35 This data does not include unsuccessful attempts, though the NORC report does.

36 This data does not include unsuccessful attempts, though the NORC report does.

37 "Sharing" and "reporting" refers to communicating information regarding misconduct and/or assault to University staff or administration. In this table, instances of misconduct do not include instances of sexual assault. N/A is used in the event that fewer than 10 respondents indicated sharing a sentiment to protect respondent privacy.

Worried that if I tell someone at the University of Chicago, the administration will take action against the entire organization/group that this person belongs to, rather than just the person who did something wrong	10.5	17.2	N/A	N/A
Worried that if I tell someone at the University of Chicago, the administration will take action on their own without my permission	25.3	44.3	20.3	34.2

Nearly all of these reasons can be tied back to the University of Chicago administration. The responses "did not know who I should tell" and "did not know where to go to report" indicate a lack of marketing on behalf of the University. "Fear of being treated with hostility" and "fear of being blamed or not believed" evidences a fear of re-traumatization at the hands of administrators. "Did not want any action to be taken," "Worried… the administration will take action against the tire organization…" and "worried… the University will take action… without my permission" demonstrate a lack of faith that the administration prioritizes student desires. Finally, "didn't think the University of Chicago administration would do anything" shares the damaging opinion that reporting to the University does not produce positive— or any— results.

Together, these data indicate that sexual misconduct exists at the University of Chicago, that students continue to under-report sexual misconduct crimes, and that negative student attitudes toward the administration preclude reporting.

Organizational Analysis

Hierarchy and Responsibilities

The University of Chicago administration shares the complex, decentralized structure that is a hallmark of many bureaucratized universities. At the helm of this structure is President Robert Zimmer, who oversees both the College (home to the undergraduate student body) and all graduate schools. Beneath him is Provost Daniel Diermeier, who is oversees academic priority-setting and budgetary allocation for the College and all graduate schools. Both Zimmer

and Diermeier oversee faculty beyond those which are outlined by this hierarchy, including all academic Dean appointments. Within the Office of the Provost are two offices whose work deals, in whole or in part, with sexual misconduct: the Office for Equal Opportunity Programs and Campus and Student Life. The work done by both of these offices impacts all students—both graduate and undergraduate— at the University of Chicago, making their reach broad and their potential impact high.

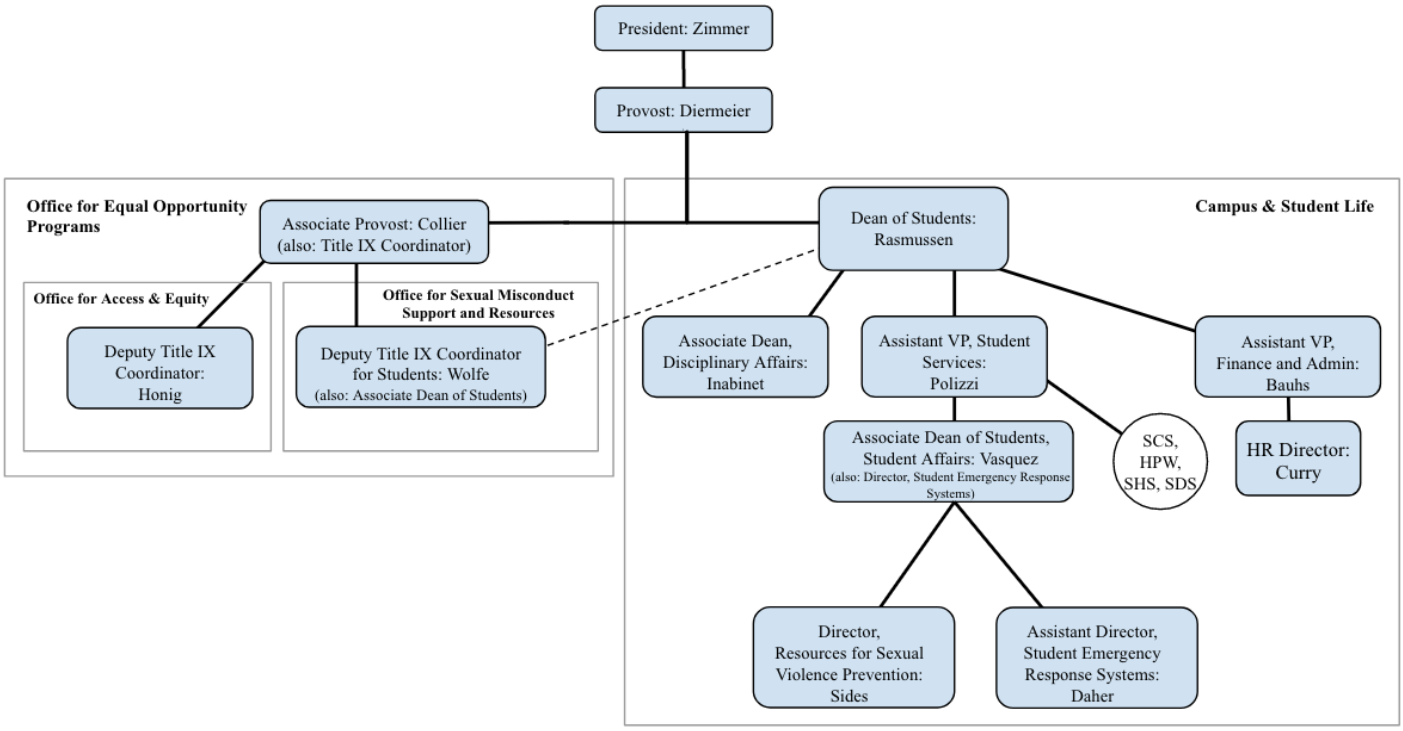

Figure 1. Hierarchy of Administrators Involved in Sexual Misconduct

The smaller of the two offices, the Office for Equal Opportunity Programs, is run by Bridget Collier and directly manages the Policy on Discrimination, Harassment and Sexual Misconduct. In her role, Collier oversees Shea Wolfe, whose titles include Assistant Dean of Students, Deputy Title IX Coordinator for Students and Director of the newly-established Office for Sexual Misconduct Support and Resources. Wolfe not only directs this office: she is its only

current employee. Collier also oversees Elizabeth Honig, who is the Deputy Title IX Coordinator for Faculty and Staff, and the Director of the Office for Access and Equity.

Within Campus and Student Life, Michele Rasmussen serves as Dean of Students, and oversees all operations within CSL. Individuals directly reporting to her include Tim Bauhs (Assistant Vice President for Finance and Administration), Mario Polizzi (Assistant Vice President for Student Services), and Jeremy Inabinet (Assistant Dean of Disciplinary Affairs). Bauhs is included in this list because his office manages finances and human resources, which impacts resources including staffing. Inabinet oversees all disciplinary proceedings, including sexual misconduct cases. Inabinet does not manage another mid-level administrator; his only support staff is a secretary he shares with Belinda Vasquez. Though they reside in two separate offices, Inabinet and Wolfe work most closely with one another, overseeing resources and discipline for sexual misconduct. Polizzi oversees many programs, including Student Health and Counseling Services, Health Promotion and Wellness, Student Disability Services, Resources for Sexual Violence Prevention and Student Emergency Response Systems.

Under Polizzi's purview is Belinda Vasquez, who oversees both Resources for Sexual Violence Prevention (RSVP) and Student Emergency Response Systems (SERS). Whereas SERS is directed by Lynda Daher, RSVP is directed by Vickie Sides. Sides and Daher's roles intersect often, particularly because Sides serves as a Sexual Assault Dean-on-Call (SADoC), a program run by Daher. Sides also works closely with Wolfe; their offices share a wall.

Two peer education programs exist under the purview of Polizzi, Vasquez and Sides. Within Student Health and Counseling Services, Peer Health Advocates (PHA) work to promote sexual health and healthy relationships through the InTouch program. Within Resources for Sexual Violence Prevention, Peer Health Educators conduct sexual violence prevention education with fellow students. Although Sides does not oversee any administrative staff, she

does oversee the Peer Health Educators. Both of these groups are not included in the hierarchy above because they are comprised solely of students and do not handle priorities and planning for their programs.

It is imperative to remember that the aforementioned individuals are not the only University of Chicago faculty involved in sexual misconduct prevention and response; rather, these individuals are most directly responsible for administering programs as outlined in the Policy on Harassment, Discrimination and Sexual Misconduct. Table 2 outlines in more detail their major responsibilities outlined by University websites and publications and, when applicable, discussed during interviews[38].

Table 2. Administrator Responsibilities Related to Sexual Misconduct

Name, *Title*	**Related Responsibilities**
Zimmer, *President*	Responsible for day-to-day management of the University.
Diermeier, *Provost*	Responsible for day-to-day management of academic affairs.
Collier, *Associate Provost, Title IX Coordinator, Director: Office for Equal Opportunity Programs*	Coordinates compliance with Policy on Harassment, Discrimination and Sexual Misconduct. Oversees investigations pursuant to policy.
Wolfe*, *Associate Dean of Students, Deputy Title IX Coordinator for students, Director: Office of Sexual Misconduct Support and Resources*	Manages tracking and intake of student reports of sexual misconduct. Conducts campus safety analysis for all new reports. Implements interim measures and accommodations for students. Provides information regarding support services and disciplinary processes. Develops training and prevention programs. Collaborates with CSL.
Honig, *Deputy Title IX Coordinator, Director: Office for Access and Equity*	Assists with Title IX related efforts for faculty and staff, including facilitating training sessions and resolution of complaints.
Rasmussen*, *Dean of Students*	Oversees all CSL areas and encourages collaboration among colleagues. Sets priorities and stewards resource allocation for CSL. Advocates student needs.
Inabinet*, *Associate Dean of Disciplinary Affairs*	Leads investigation and adjudication of cases related to student sexual misconduct and discrimination. Advises campus community on best practices for sexual misconduct prevention and education. Recommends policy revisions to Provost.

[38] Individuals who participated in administrator interviews denoted by an asterisk.

Polizzi*, *Assistant VP for Student Services*	Oversees critical student service operations (including Student Health Service, Student Counseling Service, Health Promotion and Wellness, Student Disability Services, Student Emergency Response Systems, Resources for Sexual Violence Prevention).
Vasquez*, *Associate Dean of Students for Student Affairs, Director: Student Emergency Response Systems*	Lead coordinator of University Student Emergency Response Systems. Sets strategic goals for SDS, Dean-on-Call programs, Bias Response Team, and RSVP.
Sides*, *Director: Resources for Sexual Violence Prevention*	Directs RSVP, spearheading educational, awareness and advocacy initiatives. Oversees peer education programs. Handles administrative processing. Charts programmatic priorities.
Daher, *Assistant Director: Student Emergency Response Systems*	Aids coordination of SERS.
Bauhs, *Assistant VP for Finance and Administration*	Provides strategic leadership for CSL on financial planning and management, and financial operations. Offers broad fiscal oversight.
Curry, *HR Director*	Develops and implements human resources strategy, policies, and practices for CSL.

Student-Facing and Admin-Facing Administrators

Throughout the rest of this report, administrators will be described as "student-facing" or "admin-facing." The field position of an administrator can act as a lens that alters their perception and opinion. Student-facing administrators include Jeremy Inabinet, Shea Wolfe and Vickie Sides, because each of their roles requires ample contact with students. To many students, these individuals are the public face of the administration, meaning that they receive student feedback and work closely with student activists and Student Government to address concerns. By contrast, admin-facing administrators have less direct, consistent contact with students, working most closely with other administrators. These administrators include everyone except Inabinet, Wolfe and Sides; of interview participants, Vasquez, Polizzi and Rasmussen are admin-facing. Admin-facing administrators are less likely to have subject matter expertise and more likely to have ample managerial experience; the opposite is true for student-facing administrators[39].

[39] This characterization stems directly from input given during interviews with both types of administrators.

Board of Trustees' Role

The Board of Trustees (BOT) operates external to the central University administration. Its 55-person membership and proceedings are governed by the University's "Articles of Incorporation, Bylaws and Statutes," which stipulate that the BOT "ensure the capacity of the University to fulfill its mission for current and future generations." The BOT is involved in priority-setting and fulfillment, playing "an integral role by providing oversight and input regarding the University's large scale programmatic goals and its financial and physical resources[40]." This oversight and input is carried out by nine standing committees: Audit, Executive, Financial Planning, Institutional Capacity, Investment; Medical Center Executive Committee, Outward Engagement, Trusteeship and Governance, and University Advancement. The BOT works closely with the Office of the President to coordinate its work.

Role of Committees

In addition to the aforementioned actors, two committees hold major responsibilities that dovetail with Title IX. Administrator interview data revealed that when the "Policy on Discrimination, Harassment and Sexual Misconduct" requires revision, a faculty committee is appointed and convened by the Provost. Policy revisions can be communicated to this committee by external actors, such as central administrations, but those actors are not directly involved in the revision process itself.

A second, relevant committee is the University-Wide Student Disciplinary Committee. The UWSDC has three chairs who spearhead cases on a rotating basis. When a disciplinary case is filed, Inabinet leads its initial investigation, working with the UWSDC to determine whether a trial is necessary. If Inabinet and the UWSDC decide that a trial is required, investigations continue. Later, the UWSDC conducts a disciplinary hearing, at which Inabinet is present, and privately determines a verdict, which is later passed to students.

[40] "Board of Trustees." *Board of Trustees | The University of Chicago*, trustees.uchicago.edu/.

Members of the UWSDC include faculty, staff and students, who undergo differential selection processes. Students complete an application for a one-year position, and all applications are reviewed by the Provost's office. By comparison, staff and faculty members are recommended by community members and selected by for a three-year term by the Provost. At the conclusion of a three-year period, faculty and staff members must wait a minimum of one year before resuming their place on the UWSDC.

Task Forces and Advisory Boards

The Office of the Provost has convened two additional partnerships to improve sexual misconduct prevention and response efforts. The Campus Partner Task Force on Sexual Misconduct is comprised of students, staff, faculty and administrators, and "provides opportunities for further training" of its members, "reviews best practices related to prevention," and "analyzes data on campus trends" related to sexual misconduct. In addition, the Sexual Misconduct Advisory Board is a group of student liaisons that works closely with the Provost's office to provide student perspectives and input on sexual misconduct policies, programs and procedures.

Peer Institution Benchmarking

A group of nine peer institutions were identified by University administrators as benchmarks: Harvard, Princeton, Yale, Columbia, Stanford, MIT, Brown, Cornell and Northwestern[41]. Staffing structures at each school were researched, focusing on two metrics: number of staff, and organization of offices. The following three data tables compare number of staff at the University of Chicago and each peer institution across three resource areas: Title IX Coordinators, Disciplinary Investigators, and Prevention Coordinators. These areas were chosen

[41] To enhance readability, I will not include in-text citations for every table. Rather, all references are listed at the conclusion of this paper.

based on the organizational structure described above, and are analogous to offices run by Bridget Collier, Jeremy Inabinet and Vickie Sides respectively[42].

Comparing Title IX Offices and Coordinators

Table 3 compares the the number of Title IX Coordinators (TIXC) between nine peer institutions. Title IX Coordinators were identified by anyone named as such on a university's website or in their formal policy. At the University of Chicago, Collier, Wolfe and Honig are all appointed Title IX Coordinators; thus, our total is three. By contrast, many peer institutions have far more TIXC— Harvard University, for example, names 60 on their website. Only one peer institution, Princeton University, has as few Title IX Coordinators as the University of Chicago; however, this is in part because at Princeton, interim measures are coordinated by a separate office, allowing TIXC to work almost exclusively on cases in the formal disciplinary process.

Table 3. Peer Institution Staffing Resources- Title IX Coordinators ("S" = shared)

Title IX Coordinators	**UChicago (Reference)**	**Harvard**	**Yale**	**MIT**	**Columbia**	**Stanford**	**Brown**	**Cornell**	**NU**	**Princeton**
Leadership	Collier	4	3	1	7	1	1	1	1	2
Admin Support	0	2	0	1	1	1	0	0	0	1
For Administration	0	9	0	0	0	0	0	0	0	0
Undergrad Cases	Wolfe	2	8	1	0	0	1	1	1	0
Grad Cases	S	21	11	1	0	0	2	S	S	0
Faculty Cases	Honig	12	S	7	0	0	1	1	0	0
Staff Cases	S	12	S	2	0	0	1	S	0	0
Other/All Cases	0	1	1	0	2	5	0	3	4	0
Total	**3**	**60**	**24**	**13**	**10**	**7**	**6**	**6**	**6**	**3**

Across all schools, Title IX Coordinators tended to be division-specific, population-specific, or both. At division-specific schools, there is at least one TIXC within each graduate or

[42] Bridget Collier is named because she is the lead Title IX Coordinator at the University of Chicago. Jeremy Inabinet is named because although he reports to Michele Rasmussen, she is not involved in the formal disciplinary process. Vickie Sides is named because although she reports to Belinda Vasquez (and Mario Polizzi and Michele Rasmussen), they do not coordinate prevention programing itself.

undergraduate school (i.e., one TIXC per graduate school and one TIXC for all undergraduate students). At population-specific schools, there are typically at least four TIXC: one for all undergraduate students, one for all graduate students, one for all faculty and one for all staff. The University of Chicago is decidedly not division-specific— we have centralized TIXC to serve the entire University community— but also lacks population-specificity, as Honig serves both faculty and staff, and Wolfe serves all students.

Comparing Disciplinary Affairs Teams

Table 4 compares the number of disciplinary investigators existed at each school. It is important to note that at many peer institutions, disciplinary investigators are housed within the Title IX Office, such that leadership and administrative staff are shared between offices. In these instances, cells are marked with "N/A". At the University of Chicago, disciplinary affairs is a standalone office headed up by Inabinet, who acts as the office's director and its solitary investigator. By contrast, every other institution had both leadership staff and investigative staff, even when leadership was shared with the Title IX Office.

Table 4. Peer Institution Staffing Resources- Discipline

Discipline	University of Chicago (Reference)	Harvard	Yale	Stanford	Brown	Columbia	Cornell	MIT	NU	Princeton
Leadership	Inabinet	1	2	1	1	N/A	1	N/A	N/A	N/A
Investigations	0	5	1	2	2	3	2	2	2	2
Admin Support	Bridgeman	1	3	1	0	N/A	0	N/A	0	0
Total	**2**	**7**	**6**	**4**	**3**	**3**	**3**	**2**	**2**	**2**

As described in Table 4, the University of Chicago has among the lowest number of total disciplinary coordinators (2). However, we are arguably less well-resourced than even these numbers capture: the other three institutions with two total staff share leadership with the Title

IX office, such that both staff members are investigators. By contrast, the only investigator at the University of Chicago is Inabinet[43]. Most universities (8/9) had at least two investigators.

Comparing Preventative Services

Table 5 summarizes preventative services at peer institutions, which encompasses the main focus areas of the University of Chicago's RSVP: education, awareness, and advocacy.

Table 5. Peer Institution Staffing Resources- Prevention

Prevention Coordinators	**University of Chicago (Reference)**	**MIT**	**Brown**	**Yale**	**NU**	**Princeton**	**Harvard**	**Stanford**	**Columbia**	**Cornell**
Leadership	Sides	1	1	2	1	1	0	1	1	1
Administration	0	1	1	0	1	1	0	0	0	0
Education	0	3	2	1	1	1	1	1	1	0
Awareness	0	0	1	1	0	1	0	0	0	0
Advocacy	0	2	2	0	1	0	2	0	0	0
Other	0	0	0	1	0	0	0	1	0	0
Total	**1**	**7**	**7**	**5**	**4**	**4**	**3**	**3**	**2**	**1**

The structure of these offices varied widely between institutions— some universities had central administrative staff within Title IX Offices dedicated to prevention work, while others had external offices (like RSVP) which housed prevention. Of those with external offices, preventative resources were often combined with support services (many offices were named "Sexual Harassment and Assault Response and Education," or "SHARE"). Other universities housed preventative resources under programs similar to the University of Chicago's Student Health and Counseling Services and Health Promotion and Wellness. In both cases, these offices often assumed the support services (provided by Wolfe here), allowing their Title IX Office to align more closely with disciplinary measures.

[43] Another noticeable trend was the education-level of Title IX investigators. At many schools, Title IX investigations are either conducted or overseen by someone with a J.D., which is not the case at the University of Chicago. Inabinet holds a Ph.D. not a J.D.

As evidenced in Table 5, the University of Chicago has fewer preventative staff[44] than nearly every peer institution. It was most common for peer institutions to have staff dedicated specifically to prevention education: all of our peers have at least one person whose primary function is education coordination. This represents a major limitation of the University of Chicago's capacity to conduct primary prevention.

Benchmarking Takeaways

Overall, peer benchmarking reveals that the University of Chicago is under-resourced when compared with peer institutions. Though there exists a wide variation in organizational structures, each peer institution managed to dedicate more staff to each resource area (Title IX, discipline, prevention). While comparing quantity is helpful, it is equally important to look at quality of those staff; not only did peer institutions have more staff relative to the University of Chicago, but those staff were more likely to be in student-facing, rather than admin-facing, roles.

Administrator Interview Themes

Although each administrator interview was conducted independently, common themes emerged during the transcription and coding processes. Administrators discussed the current state of sexual misconduct prevention and resources, outlining administrative priorities (Table 6), enumerating existing challenges they face (Table 7) and discussing their future goals for sexual misconduct prevention and resources (Table 8). Each data table presents common themes discussed throughout interviews and lists the total number of administrators who mentioned that theme in the rightmost column. This approach was taken to respect participants' privacy.

Because Polizzi and Vasquez requested to interview together, it was assumed that any theme mentioned by one person was supported by the other. Both parties expressed agreement with one another throughout the interview, sharing verbal and non-verbal cues. Furthermore, if

[44] Preventative staff does not include peer educators, which exist at the University of Chicago and many of its peer institutions.

and when they did disagree, both parties felt comfortable making their disagreement or skepticism known within our group[45]. It was not assumed that any other administrators would necessarily agree with one another.

Priorities Identified by Administrators

Identifying administrative priorities is important ahead of policy recommendations as it informs feasibility: measures that align with stated priorities may be adopted more quickly or enthusiastically. These priorities are described in Table 6, which distills priorities into "goals" and "actions."

"Priority Goals" explain why the administration is concerned with improving policies, processes and procedures surrounding sexual misconduct. Five major goals emerged during six successive interviews: addressing gaps in the current system, empowering student survivors, telegraphing that the administration takes misconduct seriously, remaining competitive with peer institutions, and becoming a national exemplar. Notably, the latter three goals relate to the University's external image, suggesting that popular opinion is a strong motivator.

Interviews also revealed action items, which are listed under "Priority Actions." Action items can be characterized more broadly in three main areas: maintenance, improvements and investments. For maintenance, administrators described the need to address compliance by taking care of the systems already in place. They described these as ongoing priorities for which central budgetary allocations will always be made. For improvements and investments, administrators discussed actions to improve existing initiatives and fund new resources. With limited annual resources, the University must, in the words of one administrator, "be shrewd" in deciding which initiatives will be funded each year.

[45] It is important to note that both Polizzi and Vasquez are admin-facing actors. Although Polizzi outranks Vasquez in the organizational hierarchy, their roles contain significant overlap. No clear power dynamic emerged between them, enabling me to assume that Vasquez was able to disagree with Polizzi should she so desire.

Table 6. Priorities Discussed by Six Administrators

Priority Goal	Example/ Quote	# Admin who mentioned
Address gaps in current system	Expressed ongoing desire to identify and improve upon weaknesses in policy and implementation.	5
Empower students	"That's the philosophy we take: we want you to know what your choices are and then you get to make those choices from there."	4
Telegraph importance	"The University does care deeply about this. We want people to know that this is not behavior that we tolerate; we hope that people will report and seek support and resources as they see fit."	4
Benchmark to peers	Expressed desire to incorporate best practices from peer institutions to remain current.	5
Become a national exemplar	"We really want to lead the way in this area and in order to do that, we have to make recommendations for change."	4
Priority Action	**Example/Quote**	
Maintenance	Expressed ongoing need to invest in reporting and discipline to maintain compliance with federal and state law.	4
Improvement	Improve marketing of existing resources and services to students.	5
	Inventory and evaluate existing policies, procedures and programs.	4
	Include student stakeholders in priority-setting discussions.	2
	Build consensus about priorities and plans within administration.	2
Investment	Discussed plans to invest in prevention.	6
	Discussed plans to invest in staffing.	3

Improvements and investments are made distinct by their requirement of additional budgetary allocations; improvements do not require new funding, whereas investments do. Administrators expressed desires to inventory current resources, thereby enabling evaluation and refinement. Further, they communicated the need to improve marketing and public relations efforts, both to inform students and combat negative stigma against the administration. Some administrators shared their desire to support student-led initiatives, noting that programs with a "grassroots feel" may be more well-received than top-down initiatives. In addition, two administrators affirmed the need for consensus-building among administrators, stating: "You don't want to lead with communications, you always want to lead with strategy. [Actions] should all be driven from clearly articulated definitions and objectives."

Two investment areas were identified: prevention and staffing. All six administrators expressed that prevention is a high-priority area for the administration; many pointed to recent prevention efforts, like the Task Force, as evidence of this priority. However, although every administrator agreed that the University should invest in prevention, they were less likely to agree upon what those investments should be. Student-facing administrators (Wolfe, Inabinet, Sides) were more likely to offer specific answers, while admin-facing administrators (Rasmussen, Polizzi, Vasquez) were more likely to demur. One administrator directly addressed this discrepancy: when asked to name specific prevention investments, they said "I don't think we've gotten there entirely. I think particular offices, and particular people maybe think in that way. It's definitely a question that I'm engaging with… but we're still in the inventory phase." This suggests that that although priority-setting and planning has occurred on an individual level, among student-facing administrators, admin-facing actors and the departments they run are proceeding with more caution.

In addition to prevention, three out of six administrators described staffing as a major priority. When discussing increasing staff, most administrators agreed that additional student-facing staff are needed, as opposed to admin-facing staff. One administrator summarized staffing priorities, stating "we want to make sure we have bandwidth, that we have bench depth, that we have redundancy… particularly as we expand our reach," suggesting that the administration prioritizes two things with respect to hiring: breadth and quality. The University seeks to expand staff in all resource areas, ensuring that those staff are interchangeable (in case of an emergency). Thus, it could be likely that new hires will have similar training and certification as current student-facing administrators.

These data not only enumerate administrative priorities, but reveal discordance among administrators. As evidenced by the "# Admin" column, complete agreement on any single

priority was relatively rare: the only universally agreed-upon priority was investing in prevention. This suggests information asymmetry among administrators that may stem from organizational structure: decentralization can exacerbate information asymmetry by tempering lateral communication just as hierarchicalism discourages vertical communication. This theme is further discussed in Table 7, which enumerates challenges faced by the administration.

Challenges Discussed by Administrators

In Table 7, administrators describe formidable challenges they face in their roles. In contrast with Table 6, data in Table 7 displays more consensus among administrators regarding their struggles and limitations. Challenges stem from three foundational causes: structural constraints, university culture, and broad field challenges. 'Structural constraints' describe organizational problems, such as decentralized administrative structures, and challenges stemming from those problems, like poor lateral communication. It is assumed that all structural constraints can be addressed and ameliorated by targeted organizational improvements. 'University culture' refers to problems specific to the University of Chicago; however, it is assumed that these problems would not be ameliorated by organizational improvements. Rather, addressing these problems would require consensus-building among administrators and improved relations between the administration and students. Finally, 'broad field challenges' includes challenges that exist for every person or institution handling issues of sexual misconduct. These issues are non-UChicago specific, but have stymied the administration's current efforts and/or capacity to improve. Because these data are qualitative, it is difficult to definitively state which challenges bear the largest burden on administrators. However, the total number of administrators who mentioned every challenge is listed in the rightmost column.

Table 7. Existing Challenges Identified by Six Administrators

Nature of Problem	Challenge	Example/Quote	# Admin who Mentioned
Structural Constraints	Decentralized Administration	"UChicago is a bureaucratic, decentralized place… No one in the administration can directly change policy." Resultant need to foster 'influence without authority'.	5
	Poor Lateral Communication	"A lot of times people can be working on similar projects in different offices and not even realize it."	4
	Insufficient Staff	"We're woefully under-resourced compared to peer institutions in terms of money and staffing, and capacity is capacity."	4
	Limited Resources	"It's always the case that you have more emerging needs than you do resources, so you have to make some tough decisions."	6
	Decentralized Resources	There is no centralized location, either in-person or online, where students can access all available resources. Policy and marketing materials unclear and conflicting.	6
University Culture	Conflicting Administrative Priorities	Priority-setting occurs among individuals and within offices, but are trumped by University-wide priorities. Marked difference between priorities and experiences of student-facing versus admin-facing administrators.	4
	No recognition of fraternities	Failure to recognize fraternities rescinds authority, prevents oversight and access to resources. Limited individual agency to reverse decision, despite expressing disapproval.	2
	Student Attitudes	Unfavorable student attitudes towards the administration or unwillingness to learn about sexual misconduct can lead to misinformation and preclude progress.	4
Broad Field Challenges	Insufficient Academic Knowledge	Limited research and few evidence-based models for successful prevention and response efforts exist.	4
	Sensitive Subject Matter	Difficulty evaluating support and disciplinary resources because soliciting student feedback potentiates re-traumatization.	4
	Federal and State Oversight	Difficulty navigating changing legal landscape. Difficulty maintaining compliance when there exists discrepancy between federal and state requirements.	3

While all six administrators agreed that the administration has a decentralized structure, five of them characterized it as a challenge. Within the current system, there is no unified chain of command: priority-setting occurs at all levels of the administration, with student-facing actors focusing on programmatic goals for individual offices, and admin-facing actors focusing on overarching administrative and budgetary support. Therefore, "bottom-up" and "top-down"

objectives can coexist and conflict[46]. In addition, decentralization limits the formal authority administrators have over one another. This necessitates 'influence without authority,' in which administrators encourage cooperation amongst themselves despite lacking the formal authority to require it. Because student-facing administrators often have subject-area expertise, their input can drive collaborative efforts despite their lower hierarchical status. Some admin-facing participants described deferring to their student-facing subordinates during priority-setting and planning. This is particularly important when disparate offices work with similar programs or toward similar goals. Many administrators, for example, described the gamut of prevention, support and disciplinary services as sexual misconduct prevention, citing the CDC's model of primary and secondary prevention. Thus, all offices work to prevent sexual violence, necessitating collaboration.

Many participants shared the sentiment that decentralization limits authority such that the actions of any individual or office cannot alone incite change. Many proposed changes must be funneled through external approval channels, either within the central administration (for budgetary increases and reallocation) or by external committees (for policy revision). Thus, administrators note that some changes are easier to make than others.

A second structural problem is poor lateral communication, which was discussed by four administrators. Ironically, decentralization necessitates lateral communication just as it prevents it. Lateral communication is central to fostering collaboration and influence without authority. However, it is more difficult to communicate between disparate offices which are governed by different authorities and are physically separated.

[46] One hypothetical example of this would be the following: Sides expresses the need for continuous, interactive education programming, and requests funding to support this initiative. She communicates this to Vasquez, who works with Polizzi to restructure the overall budget of RSVP. This budget is passed to the central finance office of Campus and Student Life (run by Bauhs and overseen by Rasmussen). A final budget is approved by Rasmussen, and passed along to Diermeier, Zimmer and the Board of Trustees for approval. At the same time, the Board of Trustees may decide to prioritize resource awareness. This goal would be communicated to Zimmer, Diermeier and Rasmussen, who may then inform all of Campus and Student Life of this priority goal. Polizzi and Vasquez could then work to inventory and evaluate current awareness campaigns, and upon deciding they should be tweaked, instruct Sides to produce improved marketing materials for RSVP.

Four administrators acknowledged insufficient staffing as a structural limitation. Three out of those four expressed that their current job performance is stymied by insufficient human resources, a particularly pressing challenge because recent upticks in reporting have led to increases in resource utilization. Administrators shared the sentiment that "capacity is capacity": their ability to meet growing demand will eventually plateau without additional staff.

All six administrators discussed limited resources within the University, referring to annual budgets. One administrator explained that departmental budgets are constructed from three sources: central budget, University endowment, and grant funding. Together, these funding streams represent the annual total resources for any office; these resources are then funneled into various areas, including staffing, maintaining compliance, and investing in new initiatives. This process necessitates tradeoffs, particularly because budgetary allocations are decided on an annual basis and because some funding streams have dedicated purposes. (For example, grant money is restricted to specific, narrow uses, and cannot be rededicated to other causes if mid-year priorities change.)

Resources are not only limited, but decentralized as well: all six administrators discussed difficulty marketing that stems from administrative decentralization. At present, there exists a diaspora of marketing materials that is dispersed throughout various websites and offices. Thus, existing information can be difficult for students to access, particularly when those students are in crisis-mode after an incident has occured. Moreover, administrators realize that marketing materials can be vague or confusing. To combat this, they often meet with students to walk them through informational brochures and flowcharts; however, many recognize that this is insufficient. Administrators shared the sentiment that ineffective communication and misinformation can exacerbate negative student perceptions of the administration. Therefore,

resource decentralization represents a significant structural constraint, and one that contributes to cultural challenges.

The next section in Table 7 describes cultural problems present at the University of Chicago. Conflicting administrative priorities was mentioned during four administrator interviews. As mentioned above, interviewees explained that priority-setting occurs at every level— among individuals, offices, divisions, and the University at large— and that those priorities do not necessarily align. Therefore, the priorities of an individual person or office may not come to fruition, which can make those actors feel less successful.

One symptom of conflicting priorities is evidenced by administrative discord about whether to recognize fraternities. Countless studies affirm the dangerous role of campus fraternities: sexual violence is often committed at fraternities and by fraternity members. At the University of Chicago, the administration does not recognize any Greek organization, fraternities included, as a Registered Student Organization (RSO). In doing so, Greek organizations (which include both fraternities and sororities) are prohibited from accessing University-sponsored resources, including prevention efforts led by RSVP. Further, in not recognizing Greek organizations, the administration relinquishes formal oversight of those organizations. Many student activists have implored the University to recognize such organizations to no avail; however, these data suggest increasing administrator buy-in to this movement.

A final cultural challenge is that many students hold negative opinions of the administration. Unfavorable attitudes are fostered by many factors, some of which stem from the administration's current priorities, actions and positions. (For example, many students believe that the University does not take sexual misconduct prevention seriously because they do not recognize fraternities.) These unsavory attitudes can foster unwillingness to learn about sexual misconduct and lead to misinformation, all of which precludes progress.

The last set of challenges described in Table 7 is not University-specific; rather, these issues persist in all organizations handling sexual misconduct. Four administrators discussed insufficient academic knowledge about sexual misconduct stemming from a lack of research. Few studies have been done to assess the efficacy of current prevention and response models, and still fewer novel prevention models exist. Thus, it is difficult to evaluate current efforts: to quote one interviewee, "We get [student] evaluations, but then we have to figure out what [they mean] in terms of how we go forward and create." Thus, feedback can be futile when it is not contextualized by validated academic research.

Similarly, administrators noted that insufficient academic knowledge limits the ability to design prevention education; one administrator described prevention as both a "high priority" and a "great unknown." Interviewees agreed that prevention education is necessary for mitigating and eradicating sexual misconduct. After describing current University-wide prevention strategies (which include the Haven online module, Orientation Week programming and one-off workshops led by RSVP) all participants affirmed that more can, should and will be done. However, these same administrators disagreed about whether it is possible to know what should be done at this point. One administrator did discuss the need to improve primary, secondary and tertiary prevention[47], which would not only necessitate investment in prevention education (primary prevention), but also in discipline and support (secondary, tertiary prevention).

Other interviewees described challenges stemming from sexual misconduct being a sensitive subject matter. Conversations about sexual misconduct can be triggering to survivors, necessitating caution in all marketing efforts. Further, administrators asserted that direct

[47] The Center for Disease Control and Prevention (CDC) define primary prevention as "approaches that take place before sexual violence has occurred to prevent initial perpetration or victimization," secondary prevention as "immediate responses after sexual violence has occurred to deal with the short-term consequences of violence," and tertiary prevention as "long-term responses after sexual violence has occurred to deal with the lasting consequences of violence."

evaluation of support and disciplinary resources could re-traumatize students; in lieu of direct evaluation, administrators expressed their desire for campus climate assessments that gauge student opinions more indirectly.

Three administrators discussed the role of federal and state oversight, describing difficulties navigating the changing legal landscape and maintaining compliance within it. The federal government, via the Department of Education, can create policies and guidelines to which universities must comply. However, mercurial political landscapes complicate compliance— for example, the Trump administration recently rescinded the 2011 Dear Colleague Letter put forth by the Obama administration, providing alternative interim guidance. This entrusts universities with deciding whether to uphold the DCL, or revert to less stringent guidelines. Further, federal and state policy can sometimes conflict, leaving universities to decide which to uphold. Though these conflicts are usually decided in court, they do present challenges that administrations must navigate. Finally, two administrators expressed concern that changing University policy will not necessarily prevent sexual violence, citing that gender-based misconduct and sexual violence have deep-seated cultural roots.

In summary, three main groups challenges were discussed, oftentimes by a majority of administrator participants. This suggests that whereas priorities may be position-dependent, challenges are ubiquitous (or at least well-known).

Recommendations Proposed by Administrators

After identifying priorities and challenges, administrators discussed desired changes to policy, processes and procedures, summarized below in Table 8. It is important to note the stark drop in frequencies as compared with Tables 3 and 4. This decline suggests that while administrators are well-versed in discussing priorities and comfortable lamenting challenges, they are less prepared to suggest concrete, actionable changes. This is supported by the fact that

every recommendation was very general in nature: suggestions provided were rarely more specific than that which is listed here. Recommendations are divided into five areas: prevention, marketing, policy, resource allocation and evaluation.

Within the prevention subsection administrators presented the overarching desire to create a multimodal prevention strategy— one that combines primary, secondary and tertiary prevention and uses multiple strategies to address each. Three additional recommendations address primary prevention: continuing bystander intervention education, promoting longitudinal education efforts and supporting interactive education programs. Moreover, administrators reiterated the need to evaluate prevention education curriculum and programming.

Table 8. Recommendations to Improve Policy, Process and Procedure from Six Administrators

Area	Proposed Recommendation	# Admin
Improve prevention efforts	Adopt a multimodal prevention strategy.	2
	Continue bystander intervention education.	1
	Promote longitudinal education efforts.	1
	Support interactive education efforts.	1
	Evaluate prevention education curriculum and programming.	3
Enhance marketing	Create educational marketing materials.	3
	Improve marketing to clarify difference between accessing support resource and initiating disciplinary process.	3
	Increase interaction between students and administration.	2
Resource allocation	Restructure and centralize offices.	5
	Increase staffing for prevention, support and discipline.	4
	Solicit donations and grants to fund TIX initiatives.	2
Improve evaluative ability	Inventory existing policies and programs to ensure efficiency.	2
	Promote research by faculty, staff and students to establish best practices.	4
	Conduct frequent, formal campus climate assessments.	1
Policy revisions	Revise policy to include student-friendly language.	1

Three marketing solutions were presented by various administrators. Three people discussed the need to improve marketing efforts around student education, informing students

about available resources and educating them about broader tenets of prevention. Further, three administrators discussed improving clarity surrounding support services and disciplinary processes. This would require revising current materials, removing vague language whenever possible, and improving access to and awareness of those materials. Additionally, two administrators discussed the desire to leverage marketing to increase interaction between students and administrators.

To address limited resources wrought by structural constraints, five administrators suggested centralizing existing offices and four supported hiring more staff. Some administrators shared a long-term vision for one central office that houses all sexual misconduct resources, running the gamut of prevention, support and discipline. However, administrators caveated this suggestion, noting that a center of this magnitude would be a long-term undertaking. In addition, two administrators suggested soliciting donations and grants to support novel initiatives and new staff. This recommendation builds on the knowledge that grant funding is restrictive, meaning that it cannot be reallocated as University priorities shift, thereby safeguarding it. Moreover, it is possible to secure grant funding and donations relatively quickly, allowing for faster progress.

Three recommendations related to evaluative ability were made. Two administrators cited the need to inventory existing policies and programs to ensure that they follow a unified, cohesive strategy. Four administrators discussed promoting research, thereby combatting challenges that stem from insufficient academic knowledge. Further, one administrator suggested conducting frequent, formal campus climate assessments to get an indirect read on efficacy, particularly in the support and disciplinary arenas.

Only one policy recommendation was made: one administrator expressed their desire to revise policy and remove legalease, thereby enhancing readability.

Perhaps more interesting than recommendations that were provided are those that were not. In providing recommendations, administrators were generally cautious and keenly aware of feasibility challenges. The lack of specific recommendations can be explained, in part, by a lack of knowledge and consensus about current resources: it is difficult to propose specific changes without understanding what is working and what is not. Student-facing administrators were more voice specific recommendations, whereas admin-facing participants often ruminated on their inability to definitively point out solutions.

In the prevention arena, administrators offered suggestions to improve primary prevention only; they made no mention of secondary or tertiary prevention at all, let alone provide recommendations for improvement. Recommendations made to improve primary prevention were logistical rather than substantive— administrators suggested changing the method and duration of education rather than its content.

Also noteworthy was the lack of recommendations made regarding support and disciplinary resources. Administrators offered no suggestions to improve the reporting and disciplinary processes, despite demonstrating the understanding that underreporting remains a pressing issue and that many students are deterred from the FDP because it is cumbersome. Similarly, although many administrators claimed to prioritize "addressing gaps" in current policy, no mentions of actual gaps were made: the only policy-related recommendation suggested editing for clarity.

In one interview, an administrator pushed back on the idea that increasing resources will certainly improve effectiveness and aid progress, stating:

> *"It might surprise you, because so often budget and resources are invoked as reasons why we can't do something, but I actually don't think it's much of an issue around this particular topic. I think that when we can make a case for why we need to have more resources for training, or staffing, or whatever it might be, we've been generally successful in attaining them (relative to other areas of the University, which might have been a little bit more tougher to get resources). I don't think*

> *[sexual misconduct] is an area that's one of them. So I think that, very commonly a demand or request is, "more resources!"— but I actually don't think that's the most pressing issue or obstacle right now."*

Though this is not a recommendation— in fact it is the opposite— it is an strong refute of one common, simplistic suggestion and a reminder that intentionality and evidence-basis must motivate all changes, regardless of their popularity.

Limitations

These data represent sentiments shared by six University administrators in both student-facing and admin-facing roles. However, they do not encapsulate the entirety of the administration. Referring back to Figure 1, these data leave out several key administrators including President Zimmer, Provost Diermeier, Collier, Honig, Bauhs and Curry. In doing so, they may not fully capture the broadest institutional perspectives or specific financial considerations. Moreover, these interviews did not include other important organizational actors, such as the Board of Trustees and various committees and task forces related to this issue; thus, further research to understand these actors' perspectives is warranted.

Administrator Interview Takeaways

Overall, administrators identified priorities, challenges and recommendations to improve sexual misconduct prevention and response at the University of Chicago. They provided both priority goals, such as addressing gaps and becoming a national exemplar, and priority actions for maintenance, improvement and investment. Administrators discussed challenges, both University specific and non-specific in nature, that have stymied current efforts and precluded progress. University-specific challenges included structural constraints, stemming from decentralization, and cultural concerns. Finally, administrators offered recommendations for improving prevention, marketing, evaluation and policy and bolstering resources. Most recommendations were general in nature, signaling a temperate, pragmatic approach to change.

Focus Group Themes

Common themes emerged across three student focus groups and are presented in Tables 9 and 10. Table 9 summarizes student concerns surrounding the University administration and its policies, programs and procedures, while Table 10 includes recommendations. Student concerns overlap with administrative challenges, providing helpful context and informing final recommendations. Overall, student input revealed a self-perpetuating cycle in which negative attitudes toward administration discourages resource utilization, and low resource utilization fosters student mistrust, because a critical mass of student cannot attest to resource efficacy.

Theme tables are organized to provide overarching themes and more specific examples. Beside each example is the number of focus groups who mentioned it, italicized.

Student Concerns

Student concerns are summarized below in Table 9, and are organized into three broad themes: expressing unfavorable attitudes toward University administration, providing reasons for underutilization of existing resources, and noting that existing resources are inadequate.

Unfavorable attitudes toward the administration were shared during all three student focus groups. Every group believed that the administration does not prioritize sexual misconduct, pointing to a lack of resources and clarity and slow progress as evidence. Moreover, two groups believed that the administration intentionally makes resources scarce and difficult to access: they assumed that the administration was incentivized to keep sexual misconduct reports and disciplinary cases low. In addition, students in one focus group worried that administrators are not trauma-informed, and thus would re-victimize student survivors. Further, one focus group stated that they were more likely to mistrust an individual or group more when they are closely associated with the administration. (This applied both to student organizations, like RSVP's Peer

Health Educators and Student Government, and student-facing versus admin-facing administrators.)

Table 9. Student Concerns Expressed During Three Focus Groups

Overarching Theme	Example
Unfavorable attitudes toward University administration	Belief that admin does not prioritize this issue. *FG1, FG2, FG3* Belief that lack of resources and clarity is intentional. *FG2, FG3* Belief that administrators are not trauma-informed. *FG2* More likely to distrust someone who is closely associated with administration. *FG2*
Reasons for resource underutilization	*University Culture:* Unfavorable attitudes toward administration prevent student engagement with prevention programming and support resources. *FG1, FG2, FG3* Many students do not take sexual misconduct seriously. *FG1, FG3* *Poor Marketing:* Students are unaware of support resources available to them. *FG1, FG2, FG3* Students are unaware of disciplinary options available to them. *FG1, FG2, FG3* Widespread misconceptions about remedies vs. restrictions prevents any engagement with TIX resources. *FG1, FG2, FG3* Students are unaware of progress made by TIX offices. *FG3* *Structural Challenges:* Decentralized admin structure makes it difficult to know who to contact in an emergency. *FG1, FG2, FG3* Decentralized resources (online and in-person) are difficult to access. *FG1, FG2, FG3*
Existing resources are inadequate	Insufficient prevention programming. *FG2, FG3* Insufficient support resources for complainants. *FG2, FG3* Disciplinary process is lengthy and stressful, causing frequent re-traumatization. *FG3*

Students provided many reasons for underutilization of support and disciplinary resources, which fall under three general categories: university culture, poor marketing, and structural challenges. For cultural problems, students echoed sentiments shared during administrator interviews: that negative student attitudes prevent engagement, and that some students do not take sexual misconduct seriously. Under poor marketing, all three focus groups described a pervasive lack of student awareness, claiming that many students are unaware of support resources and disciplinary options available to them. Further, every group pointed out widespread misconceptions about the reporting process, with some participants espousing

inaccurate beliefs. Every focus group also noted that many students are unaware of the distinction between remedies (provided by Wolfe's office) and restrictions (handled by Inabinet and the UWSDC). One focus group also stated that students are unaware of improvements and progress made by the University; many do not realize the University endeavors to improve at all. A third reason offered to explain underutilization was structural challenges. Echoing administrator interviews, all three focus groups stated that decentralized administrative structure and decentralized resources make it difficult to access resources. Overall, students and administrators offered similar reasons for underutilization, providing nearly-identical descriptions of cultural, marketing and structural challenges.

Students also affirmed that, in addition to being underutilized, current resources are inadequate, voicing complaints about all three resource areas. Two focus groups agreed that both prevention programming (including education and marketing) and support resources (vis-a-vis remedies) are insufficient. In addition, one focus group criticized the disciplinary process, characterizing it as prohibitively lengthy, cumbersome and stressful and claiming that it has re-traumatized many students. These complaints could also inform underutilization, in that students decide not to access resources they feel will not be helpful.

Student Recommendations

Student recommendations are summarized below in Table 10. Recommendations are broken into three main areas: structural solutions, marketing solutions, and programmatic changes. Those areas are further divvied up, listing broad recommendations followed by specific proposals. Each proposal is tagged in italics by the focus group(s) in which it was mentioned.

Two major recommendations were made to improve structural problems: increasing staff and centralizing resources. Two focus groups discussed staff increases in general, proposing the addition of subject matter coordinators and administrative professionals across all resource areas.

In addition, both focus groups emphasized that representation among staff— especially student-facing administrators— is crucial. Therefore, administration should not only focus on bulking up staff numbers, but on increasing representation among races, gender identities and sexual orientations.

In addition to adding staff, students recommended improving access to resources. All three focus groups recommended centralizing administrators and resources, creating a central physical location on campus as well as a single website that includes every resource. However, students recognized that creating this central location is a long-term undertaking, and proposed two solutions to improve accessibility in the interim: decoupling student-facing administrators from Levi Hall and ensuring accessibility to all buildings. One focus group described Levi Hall as an "impenetrable fortress" that is as intimidating as it is difficult to access, noting that this perception could exacerbate the rift between students and administrators. Thus, relocating student-facing administrators could improve access by removing physical and mental barriers. Similarly, students pointed out that all buildings that house TIX resources are locked, preventing casual walk-ins. This contributes to physical and mental barriers, precluding access.

Under marketing, two broad recommendations were made: improving existing resources, and improving their publicity. For resource improvement, students in every focus group affirmed the need to clarify current informational and marketing materials to remove vague language and address common misconceptions. Further, all three groups suggested creating detailed informational materials, including timelines, flowcharts and pro/con lists, to explain all reporting and disciplinary processes. (Many such materials are already in existence, but are not made widely available.) Finally, one focus group suggested the creation of culturally-sensitive and culturally-specific resources. This suggestion operates on the knowledge that knowledge and

Table 10. Recommendations Offered During Three Student Focus Groups

Area	Broad Rec	Proposal
Structural Solutions	Increase staff	Hire staff within Disciplinary Affairs and Office of Sexual Misconduct Support and Resources. *FG2, FG3* Hire administrative assistants across all resource areas. *FG2* Improve representation among TIX staff. *FG2, FG3*
	Improve access	Create a central physical location that houses all resources. *FG1, FG2, FG3* Decouple student-facing administrators from Levi Hall. *FG2* Ensure accessibility of all buildings that house TIX resources. *FG2* Centralize all informational materials in print and online. *FG1, FG2, FG3*
Marketing Solutions	Resource Improvement	Clarify existing resources (remedies vs. restrictions, statute of limitations, student agency in investigations). *FG1, FG2, FG3* Create detailed requirements, timelines and actors involved for all reporting and disciplinary options. *FG1, FG2, FG3* Create resources tailored to traditionally underrepresented demographics, including queer folks and people of color. *FG3*
	Publicity/Public Relations	Circulate existing informational materials to increase awareness of support and disciplinary options and resources. *FG1, FG2, FG3* Increase frequency of outreach via email. *FG2* Publicize training received by administrators to combat stigma. *FG2, FG3* Emulate marketing strategies of well-known campus services (like SHCS). *FG2, FG3*
Programmatic Changes	Prevention	Promote interactive, ongoing education about prevention, bystander intervention and available resources. *FG1, FG2, FG3* Integrate education and awareness campaigns into existing, accessible systems (i.e. housing, college advising). *FG2, FG3* Offer education and training tailored to underrepresented demographics. *FG3* Fund small-scale, student-run education and awareness campaigns within student organizations, including Greek organizations. *FG1*
	Support	Create a division of Student Counseling Services specifically for sexual assault. *FG3* Assign students to a confidential SCS representative after reporting. *FG3* Conduct longitudinal measurement of TIX resource utilization to track progress. *FG3* Sponsor mentorship initiatives to promote one-on-one discussion of sexual health. *FG2*
	Discipline	Allow confidential witness statements. *FG1* Include evidence-based guidance when discussing reporting/disciplinary options. *FG3* Aggregate and publicize data regarding disciplinary case results. *FG3* Create review mechanisms for administrators and disciplinary committee members to foster accountability. *FG3*

attitudes about sexual violence and mental health can vary widely among demographic groups, and seeks to address those disparities.

On the publicity end, four strategies were offered. The first suggestion, provided by all three groups, was circulating informational and marketing materials throughout campus. Students stated that relying on students to seek out specific resources is insufficient and irresponsible, expressing their desire to see widespread campaigns promoting these resources. (One focus group hoped that student awareness about Title IX resources become as ubiquitous as "Dollar Shake Day.") Such campaigns should be carried out in-person (via efforts like posting flyers and handouts across campus, sponsoring coffee sleeves and scheduling open office hours) and online (via consistent email communications). In addition, students suggested that the administration focus on improving public relations by disseminating information to combat negative stigma. Thus, administrators should publicize themselves and their training to reduce the misconception that interactions will be re-traumatizing. Finally, students suggested that all resource areas borrow marketing strategies from other campus offices about which there is little confusion, and named Student Health and Counseling Services as a prime example.

Finally, participants suggested programmatic changes to each of the three resource areas. Within prevention, suggestions focused on education and awareness campaigns, echoing the need for interactive and ongoing campaigns. Students recommended that the University leverage robust support systems, including housing and advising, by integrating campaigns into these systems. Furthermore, students suggested sponsoring more student-led education and awareness efforts to improve traction, reiterating that such efforts can occur within smaller communities like RSOs and Greek organizations. Within support, students suggested improved access to mental health care. They recommended that SCS create a counseling division specifically for sexual violence survivors, placing emphasis on individual counseling services. One focus group expanded upon this idea, recommending that student survivors be assigned a confidential SCS representative after reporting, noting that actively connecting students to mental health care—

rather than waiting for them to request access— could remove barriers. In addition, students expressed desire to track progress of TIX efficacy by examining longitudinal utilization, suggesting that this information be included in a succinct, annual press release. Finally, students made multiple suggestions to improve various aspects of the disciplinary process. Whereas allowing confidential witness statements would improve confidentiality, promote honesty and protect against retaliation, including evidence-based guidance would ensure that students are fully informed, thereby decreasing likelihood of fatigue or re-traumatization. In addition, one focus group emphasized the need for accountability within the disciplinary process, both for administrators and the UWSDC. Students suggested that aggregated data detailing number of reports, number of disciplinary cases and the outcomes of such cases could improve accountability while combating the misconception that pursuing discipline is futile. Further, students suggested creating formal feedback mechanisms to evaluate actors involved in disciplinary hearings. These feedback mechanisms should: be confidential, not be mandatory, have no statute of limitations, and be available to complainants, respondents, witnesses, support persons, administrators and UWSDC members.

Focus Group Limitations

Focus groups are limited with respect to their generalizability: input from these 18 students cannot capture the opinion of every University of Chicago undergraduate. Demographic data in Appendix IV demonstrates that focus group attitudes and behaviors were similar to those of the general population (based on NORC data.) However, recruitment for this study did rely on social media and snowball recruitment tactics, making it difficult to penetrate different social circles outside of my own. To improve data capture, future studies like the Campus Climate Assessment should invite students to provide open-ended feedback about concerns in

recommendations. This method, though beyond the scope of my research, could ensure that feedback is representative of the entire student body.

Focus Group Takeaways

Focus group data echoed many of the concerns, challenges and recommendations provided by administrators, expanding upon many of them. Student input evidenced that negative attitudes toward and misconceptions about the administration and resources are rampant, and contribute to resource underutilization. Further, students provide valuable recommendations that are comparatively more specific than those offered by administrators.

V. Discussion

Bureaucratization in Practice

Linking data from the University of Chicago with broader sociological theory characterizes it as an example of bureaucratized higher education. Recalling Page, bureaucratization shares core features: standardization, ability to serve a client-public, and diminution of spontaneity.

Previously, I argued that under standardization, "university administrations wield power while individual administrators do not, precisely because personnel can be interchanged to best suit the desires of a bureaucracy," a principle that is evident at the University of Chicago (McNeilly, 5). Many administrators expressed their limited ability to incite change because of structural constraints; however, underlying this sentiment is the knowledge that every administrator has a vested interest in protecting his or her job security. Because their livelihood is tied to cooperation with the bureaucratic hierarchy, administrators must prioritize broad University goals ahead of their own. This concept was expressed in multiple discussions, including those surrounding conflicting administrative priorities and limited resource allocation. Furthermore, deference to the hierarchy fundamentally limits individual access to power

structures. I also discussed that "dissatisfied students can reckon with administrators but not administrations," an idea that was supported throughout interviews and focus groups (McNeilly 6). Students' access to hierarchies of power is limited, because although students or student organizations can be invited to discuss concerns and recommendations with the administration, they are fundamentally excluded from most administrative meeting and proceedings. This not only diminishes the power of the student client-public, but also fosters information asymmetry between students and administrators.

Page also notes that bureaucratization breeds diminution of spontaneity. This process can impede pace of institutional progress, explaining why so many students were unaware of recent progress (or that any progress has been made at all). Diminution of spontaneity allows institutions to remain rigid in the face of mercurial social and political pressures. In some cases, this can be a positive aspect: University of Chicago administrators, for example, uphold guidance from the Obama Administration's DCL despite its having been overturned by the current administration. However, organizational inflexibility makes it more difficult for universities to adapt to suit rapidly evolving student bodies, potentiating inadequacy and exacerbating rifts between administrations and students.

Organizational Decoupling

This research represents a clear case of organizational decoupling, in which the University of Chicago created and maintained a gap between policy objectives and actual results. Both administrators and students voiced concerns about the University's ability to uphold its current policy and meet the ultimate goal of eradicating sexual misconduct, citing past implementation failures and ongoing challenges. Thus, because the University of Chicago experiences organizational decoupling, it cannot claim accountability for sexual misconduct.

Evaluating Accountability at the University of Chicago

While Page presents the ability to serve a client-public as a core feature of bureaucracy, Kearns links that ability to institutional accountability. Recalling Kearns' dimensions of accountability breeded a two-by-two matrix that includes four types of accountability: legal, negotiated, discretionary and anticipatory. Institutional accountability for sexual misconduct at the University of Chicago can be evaluated across this matrix.

From a legal and compliance standpoint, accountability is presently upheld: the University of Chicago meets and exceeds minimum policy standards as set forth by federal and Illinois state government.

Negotiated accountability, however, is not. Negotiated accountability describes a University's response to implicit performance standards, despite a lack of legal requirement to do so[48]. Throughout this thesis, administrator and student stakeholders discussed the University of Chicago's responsiveness in mitigating sexual misconduct. Though it is clear that the University has begun thinking about and planning to improve its policies, processes and procedures, many participants shared concerns about the pace and probability of actual progress. Thus, the University cannot yet claim to maintain negotiated accountability for sexual misconduct. To remedy this, Kearns recommends consideration of the following questions:

> *What are the implicit standards upon which the University is being judged?*
> *Have there been recent changes in these standards?*
> *Who is interested in the enforcement of these standards?*
> *Is the pressure exerted by these stakeholders sufficiently strong to require an immediate tactical response?*
> *What accountability issues are currently being negotiated by other universities?*
> *What are the likely outcomes of these negotiations?*
> *Do negotiable standards provide any specific opportunities or threats to the institution?*

Administrators and students alike can use these questions to guide efforts to foster accountability (Kearns 149-151). First and foremost, a set of implicit standards should be workshopped by all

[48] Kearns notes that negotiated accountability also includes circumstances in which laws and regulations are vague. Both aspects of negotiated accountability apply to discussions of sexual misconduct.

stakeholders— students, staff, faculty and administrators— to build consensus about expectations. These standards can be formally revisited and revised on an academic year basis to ensure modernity. Stakeholders may then consider whether their pressure— the bargaining power of a client-public— is sufficient to require an institutional response. Priority-setting and consensus-building are critical factors that underlie bargaining power, as clear priorities and strong consensus potentiate success. In this way, stakeholders at the University of Chicago can better foster negotiated accountability for sexual misconduct.

The University of Chicago can focus on fostering discretionary accountability as a means of engendering public trust. Discretionary accountability applies to situations in which accountability standards and reporting mechanisms are either unavailable or informal (Kearns 152). For example, the University currently maintains discretionary accountability over disciplinary outcomes because participants can neither access a reporting mechanism nor access the bargaining power of their group (because disciplinary investigations are often shrouded in secrecy). In this case, overall accountability could be improved by elevating accountability from discretionary to negotiated by creating formal reporting mechanisms and publicizing aggregated data. More generally, the University of Chicago administration can consider which parts of its policy, processes and procedure are subject to judgement alone, and discuss how to align that judgement with the best interests of stakeholders.

Kearns' final accountability measure is anticipatory accountability, which relates to a university advocacy. To uphold this accountability, the University should take a proactive, rather than reactive, approach to changing accountability standards. Rather than conforming to demands for change, the University can endeavor to predict those changes and adopt them before

issues arise (Kearns 154). This will not only engender public trust, but also better position the University to become exemplary, a desire it has expressed on numerous occasions[49].

After examining the University of Chicago across four accountability standards, it is clear that only legal accountability is currently upheld. Despite this, there is considerable opportunity to improve negotiated, discretionary, and anticipatory accountability, as discussed above. Fostering each kind of accountability is likely to improve public perception of the University's administration, encourage resource utilization and ultimately mitigate sexual misconduct.

In the following section, I present various recommendations to the University of Chicago administration, with the goal of improving the institutions' accountability for sexual misconduct. Some recommendations refer explicitly to accountability, whereas others represent implicit standards upon which the University has been judged. Therefore, all recommendations can be interpreted through the lens of accountability.

VI. Recommendations

Final recommendations include input from student focus groups and administrator interviews and incorporate best practices from peer institutions and other literature. I have added recommendations of my own when evidence from literature was unavailable, based on evidence gleaned from my research.

Structural Recommendations

My first set of recommendations address structural constraints that were evidenced via organizational analysis, peer benchmarking, administrator interviews and student focus groups. Table 11 follows the structure of Table 10, separating structural recommendations into those that increase staff and those that improve access.

[49] A prime example of anticipatory accountability is the adoption of affirmative consent policies at Antioch College in 1990. Though this movement was lead by students, enshrinement into policy did make Antioch a national exemplar.

Increase Staff

Previous sections have discussed the need to hire staff within Disciplinary Affairs and the Office of Sexual Misconduct Support and Resources (OSMSR). By drawing on evidence from best practices and synthesizing interview input, I have provided six specific hiring and restructuring suggestions. Within Disciplinary Affairs, Disciplinary Investigators should be hired

Table 11. Structural Recommendations (FG=focus group, A=administrator, BP=best practices, I=individual input)

Area	Broad Rec	Proposal
Structural	Increase staff	Hire staff: Disciplinary Affairs/Office of Sexual Misconduct Support & Resources/RSVP. *FG, A* Within Disciplinary Affairs, hire Disciplinary Investigators. *BP* Within OSMSR, hire support services coordinator. *BP* Hire awareness/advocacy coordinator for OSMSR and RSVP. *BP/I* Hire training/education coordinator for OSMSR and RSVP. BP/*I* Hire administrative assistants across all resource areas. *FG, A* Fund Metcalf internships and work-study positions through which students contribute to marketing efforts. *I* Improve representation among TIX staff. *FG* Support diversity/inclusion efforts at all levels of hierarchy. *I*
	Improve access	Create a central physical location that houses all resources. *FG, A* Formalize overlap between RSVP, DA and OSMSR by folding all three into OSMSR. *I* Interim: relocate DA into RSVP/OSMSR building to decouple student-facing administrators from Levi Hall. *FG/I* Ensure accessibility of all buildings that house TIX resources (no ID access required). *FG* Centralize all informational materials in print and online. *FG* Workshop UMatter website to... include a flowchart of support vs. reporting vs. discipline on the home page. *I* List all TIX staff in "Contacts section". *I* Include non-UChicago resources under "Get Help Now". *I* Clarify and reorganize "Find Support" section. *I* Relocate "Ways to Get Involved" to its own heading. *I* Rebrand "Navigate the Process" to include the word "discipline." *I* Add resources/timelines to "Navigate the Process" section. *I* Add "About Us" introducing/humanizing administrators. *I* Merge "Voices" site and UMatter. *I* Recognize Greek organizations with RSOs. *FG, A*

to decrease the administrative burden on Inabinet and quicken the pace of investigations. The Human Resources department should pay particular attention to diversity and inclusion efforts for this and all subsequent hires, as students affirmed that representation plays a major role in fostering trust. Within OSMSR, three coordinators should be hired: one for support services, one for training and education and one for awareness and advocacy. (The work of the latter two coordinators may overlap with RSVP.) A support services coordinator will ease administrative

burden on Wolfe while distancing support services personnel from "the administration." This strategic move could simultaneously improve quality and foster trust. An awareness and advocacy coordinator will be instrumental in spearheading marketing efforts for all of OSMSR, which are discussed in Table 12. Additionally, a training and education coordinator will bolster capacity and ensure incorporation of best practices. As discussed previously, administrative assistants should be hired in all resource areas to decrease administrative burden on student-facing administrators. Furthermore, the administration should hire academic-year and summer interns through the Metcalf and work-study programs, providing students the opportunity to work on marketing strategy for OSMSR. This recommendation borrows best practices from other campus offices (e.g. Career Advancement). This will not only be a cost-effective solution, as students work part-time, but also one that ensures collaboration between students and the administration. Further, I reiterate the need to improve race, gender identity and sexual orientation-based representation in all areas and at all levels of the administration.

Improve Access

Efforts must also be made to improve access to administrators and resources alike. Previous sections have presented the recommendation to create a central physical location that houses Disciplinary Affairs, OSMSR and RSVP. I support this suggestion, but qualify it with the understanding that this undertaking is cost- and time-intensive. In the meantime, I have added two interim suggestions as a workaround. The first is formalizing the overlap between all three resource areas by folding them into OSMSR. The recent rebranding of OSMSR endeavored to improve visibility and access of resources; however, the name is misleading if it does not house *all* resources, including those for prevention and discipline. This would require some hierarchical shuffling: OSMSR is housed under the Office for Equal Opportunity Programs, headed by

Collier, whereas RSVP and Disciplinary Affairs are housed under CSL and overseen by Rasmussen (and Polizzi/Vasquez). It would also require the relocation of Inabinet's office from Levi Hall to 5501 S. Ellis Ave, where OSMSR and RSVP are located. Students also noted that 5501 Ellis is locked during the day, preventing accessibility; thus, the administration should move to ensure that neither appointments nor UCID badges are required for entry. Interviews and focus groups also suggested centralizing informational materials in print and online. I expand upon this recommendation by suggesting changes to the UMatter website, the most major of which is merging the "Voices" site (for OSMSR) with UMatter (which is currently run by Disciplinary Affairs). These website changes could be carried out by awareness coordinators and/or marketing interns, if hired.

The final access recommendation is recognizing Greek organizations as RSOs. As previously discussed, lack of recognition prohibits fraternity and sorority organization from accessing training and education provided by RSVP, representing a major missed opportunity to improve prevention. Recognizing Greek organizations brings other positive externalities, including increased oversight over potentially dangerous campus parties and social situations. Although this move may make the administration move vulnerable, it would be a powerful signal to the campus community that sexual misconduct is a priority issue.

Marketing Recommendations

Table 12 (above) presents marketing recommendations, which are separated into resource improvement and publicity/public relations.

Resource Improvement

Most resource improvement efforts have been explained in previous sections, and suggest improving the clarity of existing resources, the amount of those resources, and their cultural sensitivity. To this, I add the suggestion that multimedia marketing strategies be employed: while

brochures and infographics are helpful, some students may prefer to watch short informational videos or listen to podcasts. Moreover, leveraging the University's social media accounts could broaden the spread of resources while improving campus awareness.

Table 12. Marketing Recommendations (FG=focus group, A=administrator, BP=best practices, I=individual input)

Marketing	Resource Improvement	Solicit donations and grants to fund TIX initiatives. *A* Clarify existing resources (remedies vs. restrictions, statute of limitations, student agency in investigations). *FG, A* Create detailed requirements, timelines and actors involved for all reporting and disciplinary options. *FG* Create educational marketing materials for prevention. *A* Employ multimedia marketing strategies to create informational videos, podcasts, etc. *I* Create resources tailored to underrepresented minorities. *FG*
	Publicity/Public Relations	Circulate existing informational materials to increase awareness. *FG* Increase frequency of outreach via email. *FG* Incorporate materials into social media strategy. *I* Publicize training received by administrators to combat stigma. *FG* Increase frequency of open forums with administrators. *I* Emulate marketing strategies of well-known campus services (like SHCS). *FG*

Publicity and Public Relations

Under publicity and public relations, I reiterate focus group input: marketing materials should be circulated frequently, leveraging e-mail and social media. Furthermore, I suggest increasing the frequency of open forums with the administrators to improve public relations. These open forums need not be formal: for example, administrators could visit one dormitory each month of school.

Resource Area-Specific Recommendations

Table 13 includes my final set of recommendations, which are resource-area specific. This section includes recommendations for improving accountability and evaluation because those changes directly impact one or more resource-areas.

Prevention Strategy

For prevention, I recommend adopting a multi-modal strategy: one that promotes interactive, ongoing education and training. In addition to training provided by RSVP, the administration should consider expanding its Orientation Week programming, requiring that

students in every grade attend one per academic year. Moreover, O-Week programs should incorporate seminar-style and small group discussions to cater to multiple types of learners and encouraging engagement. As mentioned in other sections, the administration can leverage campus culture to integrate education and awareness efforts into strong, familiar systems such as housing and advising. Moreover, culturally-sensitive prevention education and training should be made available to all students.

Table 13. Resource Area-Specific Recommendations (FG=focus group, A=administrator, BP=best practices, I=individual input)

Resource Areas	Prevention Strategy	Adopt a multimodal prevention strategy. A Promote interactive, ongoing education about prevention, bystander intervention and available resources. *FG, A* Fund small-scale, student-run education and awareness campaigns within student organizations, including Greek organizations. *FG* Require annual, day-long orientation programming for all returning students. *I* Supplement seminar programming with small group workshops/discussions. *I* Integrate education and awareness campaigns into existing, accessible systems. FG Offer education and training tailored to underrepresented demographics. *FG*
	Support Resources	Create a division of Student Counseling Services specifically for sexual assault. *FG* Assign students to a confidential SCS representative after reporting. *FG* Sponsor mentorship initiatives to promote one-on-one discussion of sexual health. *FG* Conduct longitudinal measurement of TIX resource utilization to track progress. *FG*
	Disciplinary Process	Include evidence-based guidance when discussing disciplinary options. *FG* Allow confidential witness statements. *FG*
	Accountability	*Negotiated → Legal* Revise policy to include student-friendly changes that remove vagueness. *A* Include time limits for disciplinary case resolution in formal policy. *I* *Discretionary → Negotiated* Create review mechanisms for administrators and disciplinary committee members. *FG* Aggregate and publicize data regarding disciplinary case results. *FG* *Anticipatory → Negotiated* Increase interaction between students and administration. *A*
	Evaluation	Inventory existing policies and programs to ensure efficiency. *A* Evaluate prevention education curriculum and programming. *A* Conduct frequent, formal campus climate assessments. *A* Promote research by faculty, staff and students to establish best practices. *A*

Support Resources

To bolster support resources, the administration should focus on improving mental health care available to students. Moreover, the administration can look into sponsoring student mentorship initiatives that promote discussion of mental and sexual health. Finally, the

University should collect and publicize information regarding TIX resource utilization such that the campus community to foster accountability.

Disciplinary Process

Three major complaints about the disciplinary process were voiced: that it is lengthy, confusing and cumbersome. It is likely that staff additions will decrease the time-intensivity of disciplinary investigations by easing the administrative burden on Inabinet and Bridgeman. With additional investigative and administrative staff, the University should be able to handle cases more quickly, and may be able to improve quality. Many marketing solutions will address confusion and misinformation surrounding the disciplinary process. The final concern to address, then, is that the process is "cumbersome." The administration has already made many efforts to reduce the emotional burden wrought by the process, standardizing testimony gathering and allowing students to appear in hearings via Skype.

Two additional suggestions may aid in mitigating this burden. One focus group suggested including evidence-based guidance when discussing disciplinary options. After reviewing the case and evidence present, an individual and their support person could meet with a TIX representative to discuss recourse, during which the TIX coordinator could provide individuals with statistics about success and satisfaction for each option. (For example, if a student lacked physical evidence, a TIX representative could state that 60 percent of cases with no evidence resulted in a "responsible" verdict.) This suggestion is controversial, as it could be used to dissuade complainants from pursuing formal discipline. However, if implemented correctly, it could empower complainants and allow them to avoid engaging in a cumbersome process only to be given a "not responsible" verdict. Additionally, by allowing confidential witness statements, the administration can encourage truthfulness from witnesses while protecting them against retaliation. This allowance would only require procedural revision in the Student Manual.

Accountability

Although all recommendations will foster accountability by catering to implicit expectations, the following recommendations formally address accountability. Two strategies could foster legal accountability where there is currently negotiated accountability. By revising formal policy to reduce vague language, the policy will become more specific, thereby reducing the "wiggle room" and "grey areas" that have confused and frustrated students. Further, time limits for disciplinary case resolution should be written into policy to codify the timeline as doctrine. This suggestion would require trials to be speedy, addressing the complaint that FDP is lengthy. Actualizing both recommendations will require the policy committee to convene, which makes them more difficult to implement. Two more suggestions seek to foster negotiated accountability from discretionary accountability. First, the administration should create formalized review mechanisms for themselves and disciplinary committee members. These review mechanisms would enable students to provide feedback, providing valuable real-time performance reviews. Further, aggregated data that summarizes disciplinary hearing results should be publicized to students. This measure would increase transparency and accountability alike by describing how many cases are found "responsible" versus "not responsible." This provision attempts to improve transparency without violating the privacy of both complainants and respondents, and represents a procedural change as well. Finally, one suggestion was made to foster negotiated accountability from anticipatory accountability. This suggestion simply encourages increased interaction between students and administrators. More specifically, the administration should begin meeting with community members and campus stakeholders to understand the implicit standards upon which they are being evaluated, as discussed in the previous suggestion. In this way, the University can foster negotiated accountability.

Evaluation

The recommendations provided for evaluation have been discussed in the administrator interview section. In summary, the University should inventory and evaluate existing policies, programs, procedures and curricula across all resource areas to ensure their efficacy. Further, they should conduct frequent, formal campus climate assessments to indirectly gauge progress—particularly as it relates to University culture and public opinion. Finally, the University should encourage researchers to focus on TIX, thereby bolstering academic knowledge, standards and best practices. Whereas inventorying current initiatives is relatively simple (and already underway), evaluating those programs and encouraging research are more difficult. The ability to interpret evaluations relies on best practices which do not yet exist in this area. Thus, these recommendations range in feasibility.

Potential Challenges

Most recommendations discussed above require reappropriation of current resources and/or procedural changes, making them financially feasible. The adoption of marketing and resource area solutions would be benefitted by additional staff and organizational restructuring: attempting to undertake the former changes without addressing structural challenges could overburden existing staff. Therefore, adopting structural solutions of great importance.

The main challenge to adopting structural solutions is that many recommendations require budgetary allocations. At the University of Chicago, budgets are approved on an annual basis, and fiscal years begin every July first. Next year's budget has already been planned, and is now in approval stages. This makes it unlikely that any major changes will occur in the next fiscal year. However, these solutions can still be considered during the next fiscal year, which may be helpful in itself: the University can use extra time to research, inventory and plan such that recommendations, when adopted, reach their maximum potential for success.

VII. Conclusion

This research discusses the relationship between higher education, institutional accountability and sexual misconduct by conducting a case study into the University of Chicago. The University complies with federal and state policy standards, yet continues to face persistent and pervasive sexual misconduct; this provides evidence that supports two phenomena: that organizational decoupling occurs, and contributes to a lack of institutional accountability for sexual misconduct at the University of Chicago.

To better understand this problem, multi-modal data were collected. ASR and Campus Climate Assessment data affirm the existence of sexual misconduct and under-reporting at the University of Chicago, linking both problems to the administration. Further organizational analysis and peer benchmarking evidenced that the University of Chicago is less well-resourced than many of its peers across three key areas: prevention, support and discipline. In-depth interviews with administrators extend this organizational analysis by presenting administrative priorities, challenges and recommendations. Whereas challenges included structural constraints, cultural issues and broad field limitations, recommendations focused on reallocating resources and improving prevention, marketing, evaluation and policy. These insights were contextualized by student focus groups, which captured student concerns, complaints and recommendations. Students echoed the mistrust in administration first evidenced by Campus Climate data, offering reasons for current resource underutilization and affirming the inadequacy of those resources. Students also offered recommendations of their own, which were more specific in nature and colored by direct, personal experiences.

The sum total of this data was linked back to the theoretical discussions of rational systems, bureaucratized higher education, institutional accountability and organizational decoupling, underscoring that the problems faced by the University of Chicago are not unique.

Finally, recommendations for improving policy, processes and procedures were offered along with a discussion of feasibility and timelines. By applying these recommendations, the University of Chicago administration can address many of the challenges and concerns expressed throughout this paper.

The blueprint for designing and implementing policies that eradicate sexual misconduct in higher education remains undiscovered. However, by analyzing instances of organizational decoupling, such as this one, researchers can better understand how and why existing strategies fail, approximating the eradication of collegiate sexual misconduct.

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Appendices

Appendix I: Policy on Discrimination, Harassment and Misconduct Checklist

Minimum Standard Checklist (adapted from McMahon 2008)

Model Policy for the Prevention and Response to Sexual Assault Template	Included in Policy
I. Definition of sexual assault includes:	
A. Explanation of consent	Yes
B. Descriptive scenarios of sexual assault including non-stranger sexual assault	Yes
C. Definition of terms	Yes
II. Design of the sexual assault policy incorporates:	
A. Clear statement of commitment to deter sexual assault	Yes
B. Provisions for public acknowledgement of commitment	Yes
C. Identified methods for policy distribution to campus community	Yes
D. Ease of policy accessibility to entire campus	Yes
III. Provisions for training for:	
A. Resident assistants and resident coordinators	Yes
B. Students, faculty, and staff	Yes
IV. Methods to support student reporting include:	
A. Information about what students are to do if sexually assaulted	Yes
B. IHE response to a report of a sexual assault	Yes
C. Plan to protect victim confidentiality	Yes
D. Availability of anonymous victim reporting	Yes
E. Clear response if victim has violated alcohol or drug policy	Yes
V. Prevention efforts and resources for victims	
A. Published availability of resources that support:	
1. Sexual assault prevention programs	Yes
2. Campus safety within residence halls	Yes
3. Campus safety on campus	Yes

	4. Victim's health and on-campus forensic services	Yes
	5. Victim's mental health	Yes
VI. Identification of methods/policies that prevent reporting		
	A. Annual evaluation of students' knowledge of:	
	1. Who to notify when a sexual assault has occurred	Yes
	2. IHE response to a sexual assault	Yes
	3. IHE policy for victim confidentiality	Yes
	4. IHE policy for victim protection	Yes
	5. IHE response to victim's use of illegal drugs or under age alcohol consumption	Yes
VII. Encourage victim reporting with inclusion of methods that:		
	A. List services to aid victim	Yes
	B. Demonstrate victim safety	Yes
	C. Outline campus law-enforcement protocols	Yes
	D. Provide for health needs of the victim	Yes
	E. Outline prevention education for the campus community	Yes
	F. Show strong visible commitment to assure victim confidentiality	Yes
VIII. Guidelines to investigate and punish perpetrators include:		
	A. Methods to address dual jurisdiction	Yes
	B. Set procedures for investigating sexual assault	Yes
	C. Identified procedures for discipline and punishment of perpetrators	Yes
IX. Policy demonstrates:		
	A. Public record documenting IHE implementation of the policy	Yes
	B. Record of assessment of effectiveness of policy	Yes
	C. Record of policy implementation	Yes
	D. Periodic review for currency of policy	Yes

Appendix II: Interview and Focus Group Questions

Administrator Interview Questions
To what extent are students aware of Title IX protections and resources? To what extent do students use these resources? To what extent do students trust these resources? To what extent are students satisfied with these resources? Do you feel that the University of Chicago effectively protects its students against sexual misconduct? How should the University of Chicago administration improve sexual misconduct prevention? How should the administration improve protection of students who have been victim of sexual misconduct? How should the administration improve response to misconduct allegations? What resources (including staff) should the University add, remove or change to aid students with complaints or concerns? How feasible is it to change University Policy? How effective is changing University Policy? (Does it reduce sexual misconduct?) How feasible is it to change University implementation? How effective is changing University implementation? (Does it reduce sexual misconduct?) How can these changes be made?

4-D Model: University of Chicago Sexual Misconduct Policy and Implementation	
Discovery	How do you define sexual misconduct? What protections do college students have against sexual misconduct? How do higher education institutions prevent sexual misconduct? How do higher education institutions protect students who have been victims of sexual misconduct? How do higher education institutions respond after someone is accused of sexual misconduct? What resources (including staff) exist to aid students with sexual misconduct complaints or concerns? To what extent are students aware of these resources? To what extent do students utilize these resources? To what extent do students trust these resources? To what extent are students satisfied with these resources? In what ways does the University of Chicago effectively prevent and protect students against sexual misconduct?
Dream	What protections do you think students should have against sexual misconduct? How can higher education institutions prevent sexual misconduct? How can higher education institutions support victims of sexual misconduct? How can higher education institutions respond after someone is accused of sexual misconduct? What resources (including staff) could aid students with sexual misconduct complaints or concerns?
Design	How should the University of Chicago administration improve sexual misconduct prevention? How should the administration improve protection of students who have been victim of sexual misconduct? How should the administration improve response to misconduct allegations? What resources (including staff) should the University add, remove or change to aid students with complaints or concerns? If all of these actions were taken, what do you think the impact would be on the prevalence of sexual misconduct at the University of Chicago? How will we know these actions were successful?

Destiny	How can these changes be made? Culture shifts? Policy changes? Administrative action? Donations?

Appendix III: Problem Establishment Data

2015 Campus Climate Survey- University of Chicago

Harassment by gender in the University system of record- Experienced versus Reported

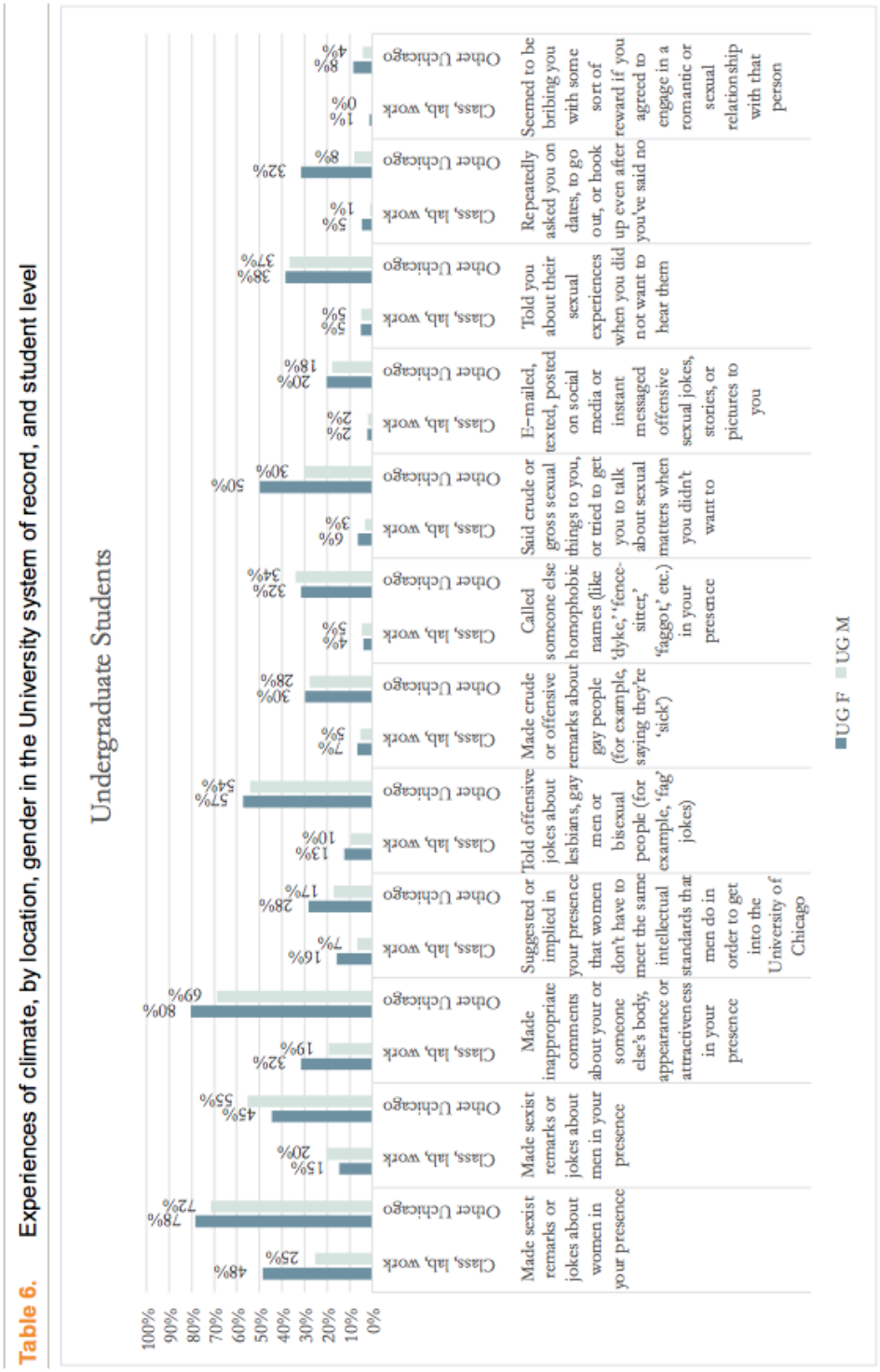
	% Female Experienced	% Female Officially Reported	% Male Experienced	% Male Officially Reported
Received persistent phone calls, emails, letters, text messages or instant messages from someone after you asked them to stop contacting you?	16.2	1.1	4.8	<0.05
Were watched from afar or were followed by someone?	16.6	1.3	4.6	<0.05
Had someone waiting for you at your residence, place of employment, classroom, or somewhere else after you asked them to stop contacting you?	5.4	1	1.2	<0.05
Had negative or personal things written about you online that made you feel unsafe?	7.5	1.2	7.1	<0.05

Respondent experiences of sexual misconduct[50], by gender in the University system of record

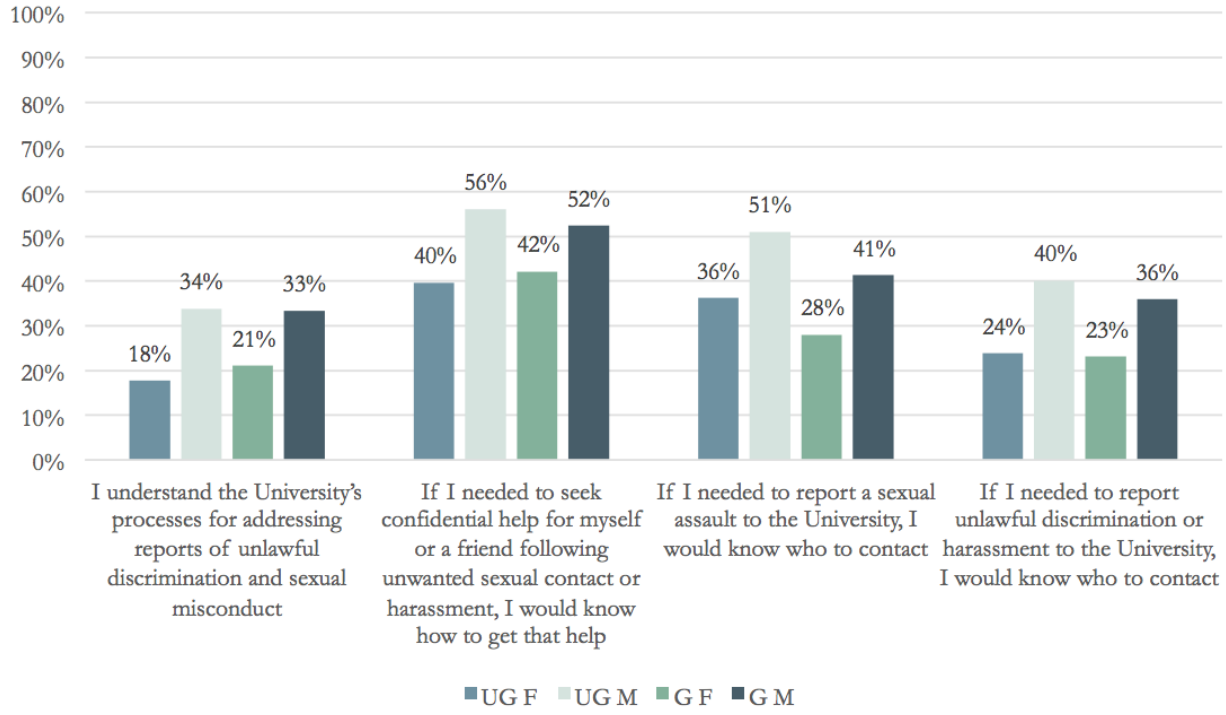
	% Female Experienced	% Male Experienced
Someone kissed me without my consent	20.5	8.9
Someone touched, fondled, or rubbed up against the private areas of my body (breast/chest, crotch or butt) without my consent	35.5	12.8
Someone removed some of my clothes without my consent	9.5	2.5
Someone put a penis or inserted fingers or objects into my vagina or anus without my consent	9.8	1.1
Someone put my penis or fingers in their vagina or anus, or made me put objects in their vagina or anus without my consent	1.9	1.9
Someone performed oral sex on me or made me give them oral sex without my consent	4.8	2.0
Had any unwanted sexual experience	52.0	20.5

[50] This data does not include unsuccessful attempts, though the NORC report does.

Experiences of climate by location, gender in the University system of record, and student level



Respondent perceptions of University sexual misconduct reporting procedures (percentage agreeing or strongly agreeing with each statement), by gender in the University system of record and student level



Respondent perceptions about University response to reports of sexual assault (percentage stating that each outcome would be "very likely" or "likely"), by gender in the University system of record and student level

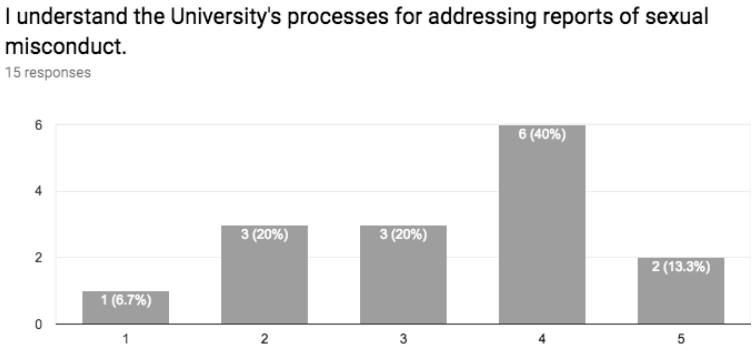
	% Female Agreed	%Male Agreed
… the University would take any reports of sexual assault seriously	54	72
… the University would assist the person in contacting local law enforcement	48	66
… the University would take steps to protect the safety of the person making the report	46	69
… the University would take corrective action to address factors that may have led to the sexual assault	21	49
… the University would hold accountable someone found responsible for a sexual assault	38	62
… the University would take steps to protect the person making the report from retaliation	41	64

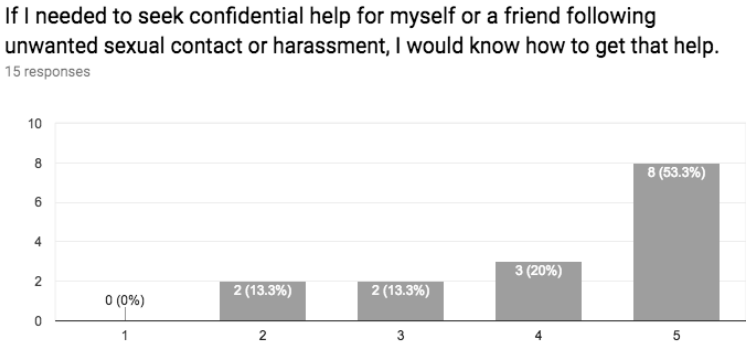
Appendix IV: Focus Group Demographics

Demographic Identity Questions. *15 respondents, 3 non-respondents.*

Gender	Count	Race/Ethnicity	Count	Grade	Count	Greek org?	Count
Male	7	Non-Hispanic White	11	First-year	4	Yes	10
Female	7	Hispanic White	2	Second-year	1	No	5
Other	0	Non-Hispanic Black	0	Third-year	1	N/A	3
N/A	3	Hispanic Black	0	Fourth-year	9		
		Asian	2	Other	0		
		Other	0	N/A	3		
		N/A	3				

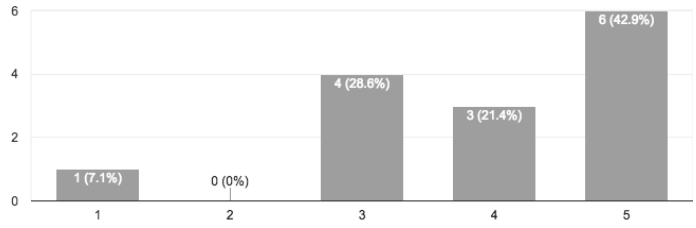
Attitude and Opinion Questions (NORC Model). *15 respondents, 3 non-respondents.* (Likert scale questions in which 1=Strongly Disagree, 3=Neutral, 5=Strongly Agree)





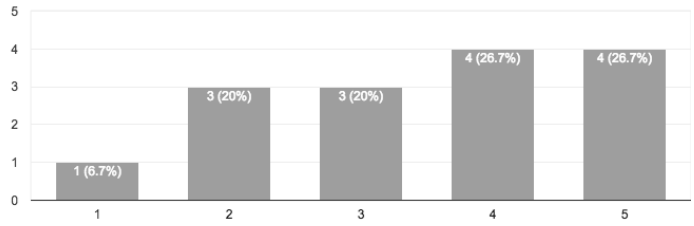
If I needed to report a sexual assault to the University, I would know who to contact.

14 responses



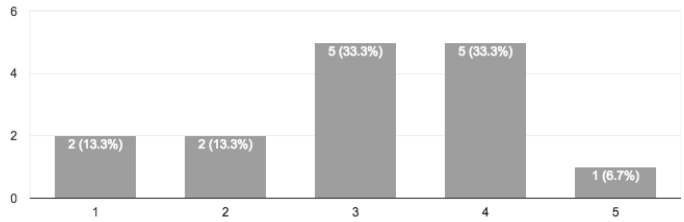
If I needed to report an unlawful discrimination or harassment to the University, I would know who to contact.

15 responses



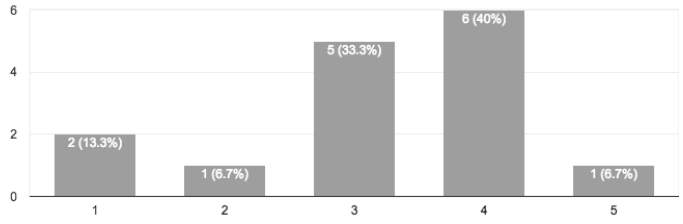
I believe the University would take any reports of sexual assault seriously.

15 responses



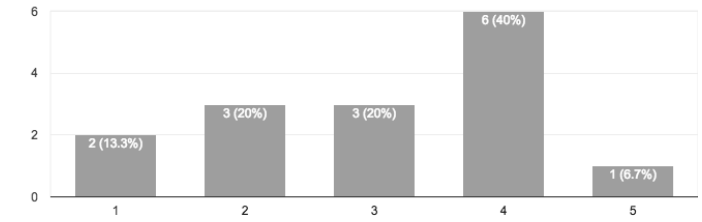
I believe the University would assist the person in contacting local law enforcement.

15 responses



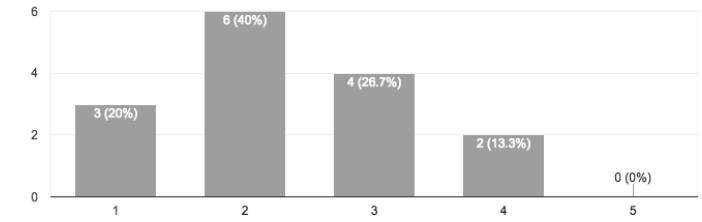
I believe the University would take steps to protect the safety of the student making the report.

15 responses



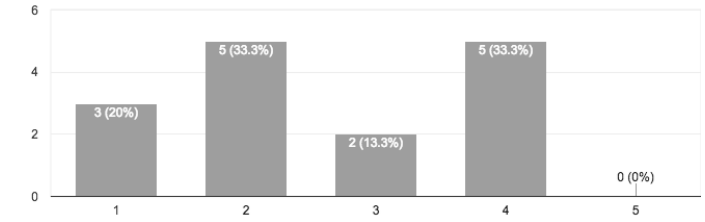
I believe the University would take corrective action to address factors that have led to the sexual assault.

15 responses



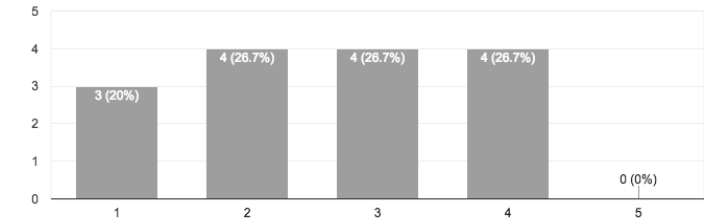
I believe the University would hold accountable someone found responsible for a sexual assault.

15 responses



I believe the University would take steps to protect the person making the report from retaliation.

15 responses



Sarah McNeilly

smcneilly@uchicago.edu ▪ 5721-3 S. Kimbark Ave., Chicago IL 60637 ▪ 609-477-9350

EDUCATION

The University of Chicago **September 2014-June 2018 (Expected)**
Bachelor of Arts, Double Major in Biological Sciences and Public Policy Studies *Chicago IL*
General Honors

- GPA: 3.53/4.00
- GRE: 164 (Q), 162 (V), 5.5 (W)
- Received a University Scholar merit-based award recognizing academic and leadership achievements

EXPERIENCE

Chicago Department of Public Health **Chicago IL**
Policy and Legislative Affairs Intern *Jan 2018-Present*

- Created executive summaries and presentations about policy initiatives to improve communication between CDPH and city officials including city aldermen and Mayor Emanuel
- Aided creation of Chicago's Child Wellbeing Index by completing a literature review of youth health measurement tools

University of Chicago Medicine **Chicago IL**
Senior Program Coordinator, TEACH Research *April 2015-March 2018*

- Progressed in leadership roles from Research Assistant to Program Coordinator to Senior Program Coordinator for a pipeline summer program that exposes high school students to health research careers
- Managed strategic planning work stream to bolster student recruitment and engagement in program
- Increased social media campaign efficacy by 28 percent by spearheading creative direction and marketing strategy
- Balanced communication with principal investigators, research colleagues and high school students
- Coded and cleaned 14 cohorts of multimodal survey data to aid analyses in Stata

Research Assistant, Valerie Press MD MPH, Section of General Internal Medicine *May 2017-March 2018*

- Collaborated with principal investigators, medical device company representatives and colleagues to design a pilot clinical trial for a handheld spirometry device (SpiroPD)
- Developed data collection instruments and educational materials for device operation instruction with patients
- Established trusting patient relationships to encourage adherence of 150 patients to study

Research Assistant, SIESTA Sleep Study *February 2016-June 2017*

- Administered in-person patient surveys to assess sleep quality in hospitals
- Documented findings for 200+ patients in Redcap, an online survey database

MATTER **Chicago IL**
Jeff Metcalf Intern *January 2016-December 2016*

- Contributed to Programs, Operations and Events teams through rotational academic-year internship
- Aided in planning and coordination of annual Midwest University Technology Showcase
- Compiled program and event attendance data to evaluate member company engagement

LEADERSHIP ACTIVITIES

Health Policy Scholars Program *May 2015-Present*

- Participated in a selective 4-year, 60 student program that provides undergraduates interested in health policy with focused seminars, relevant coursework and externship/trek opportunities

Kappa Alpha Theta Fraternity *October 2014-Present*

- Occupied a series of leadership roles including Human Resources Director (2016) and New Member Director (2017)
- Launched novel sexual assault prevention initiatives to meet growing need while coordinating required education and mentorship programs for cohort of 45 new members
- Awarded a National Theta Foundation merit-based scholarship (2017)

Student Health Advisory Board *September 2016-June 2017*

- Increased awareness of student health and USHIP insurance policies through targeted educational campaigns

Project Rousseau *January 2015-June 2017*

- Mentored 2 high school students in the Chicago Public School system by providing academic and emotional support
- Organized weekly study groups and monthly SAT/ACT tutoring for 10+ mentees

SKILLS AND INTERESTS

Language: Advanced conversational Spanish
Skills: Survey design (Redcap, PACO), data analysis (Excel, Google Analytics, introductory Stata, introductory R-Studio), video editing (FinalCutPro), Microsoft Suite, grant writing, presentation experience
Interests: Politics, sex education, knitting, travel, food and restaurants