



## American College Health Association

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March 21, 2014

Lynn Rosenthal  
White House Advisor on Violence Against Women  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Dear Ms. Rosenthal,

Following recent discussions with our colleagues at the Office of the Assistant Secretary for Health (ASH) regarding the Office of the Vice President's (OVP) efforts to address sexual violence on college campuses, we are contacting you to provide information on the American College Health Association (ACHA) and how we might further the efforts of your office. Established in 1920, ACHA is a national non-profit health association that represents multidisciplinary college and university health professionals whose principal collective interest is to advance the health of the nation's 20 million college students. ACHA is comprised of more than 2,800 physicians, nurses, and other clinical providers, mental health providers, health promotion professionals, health administrators, pharmacists and support staff in nearly 900 student health centers.

Our membership represents a range of content experts who work in applied and academic health fields. Through the Association, we address numerous health and wellness topics through multiple professional development opportunities: national and regional conferences, publications, best practice guidelines, newsletters and webinars.

ACHA also houses the National College Health Assessment (NCHA), a comprehensive health questionnaire that provides self-reported student health and health behavior data to guide local and national research, services and programming. For example, Attachment 1 is select data from the national aggregate NCHA summarizing the prevalence of sexual violence on college campuses.

Specific to the issue at hand, ACHA supports and hopes that the efforts of the White House Task Force to Protect Students from Sexual Assault will lead to:

- Federal support to create a comprehensive guide to best practices in sexual violence prevention, outreach and advocacy strategies that can be implemented by a range of campus and community stakeholders.
- Adoption of prevention strategies that are comprehensive, evidence-based and inclusive of the campus environment. This includes acknowledging the complex intersection between sexual violence and the alcohol and drinking culture on campuses nationwide.

- Clarification of federal policies, initiatives, and enforcement efforts directed at campus systems including the requirements of Title IX, the Clery Act, the Violence Against Women Act and a range of state statutes. These would include more explicit direction for campus service providers and administrators, as well as law enforcement and local judicial systems. We know that coordinated systems, versus stand-alone programs, are far more effective in addressing complex health and safety threats.

Individual members of ACHA have responded to OVP's invitation to provide input. We draw your attention to a letter submitted by Dr. Donna Barry from Montclair State University (see Attachment 2). She has assisted ACHA in providing direction and continuing education to our membership and serves as a valuable subject matter expert on campus violence.

Please do not hesitate to contact us for any additional information. We appreciate the opportunity to partner in the work of reducing this threat to the health and well-being of our college population.

Sincerely,

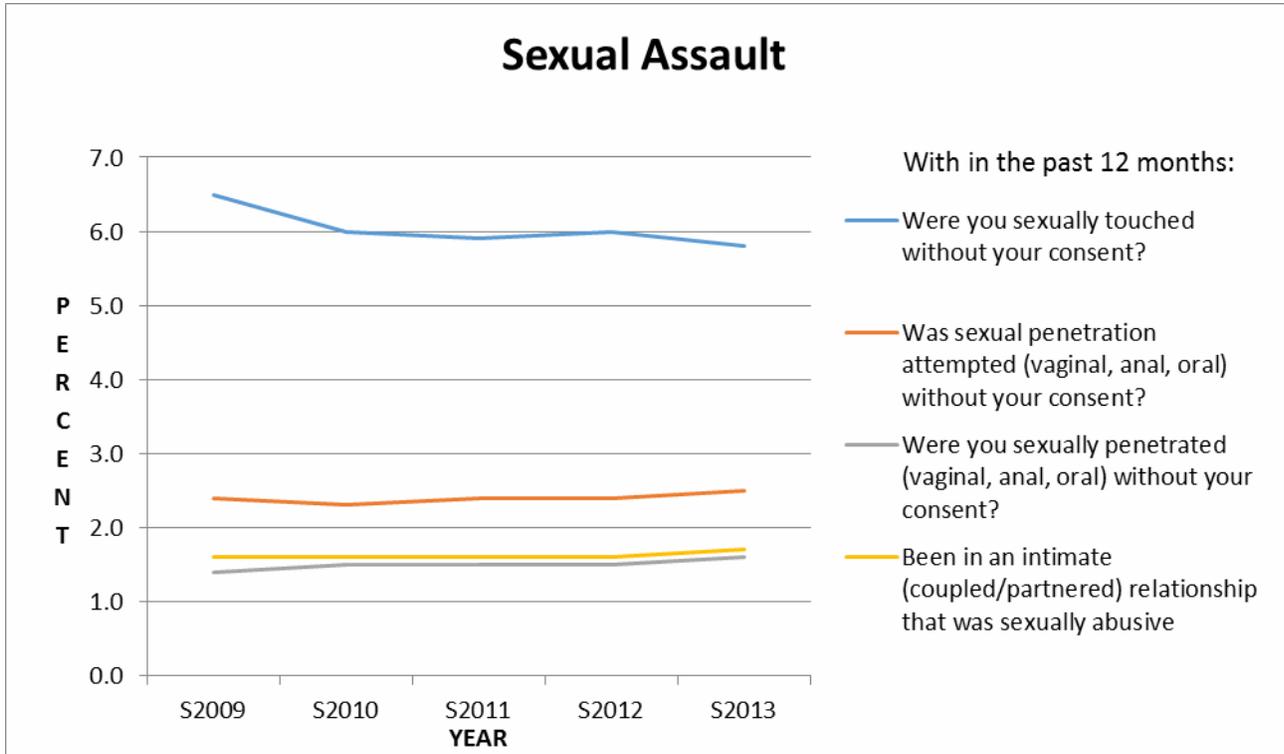


Patricia L. Ketcham, PhD, CHES, FACHA  
President  
American College Health Association

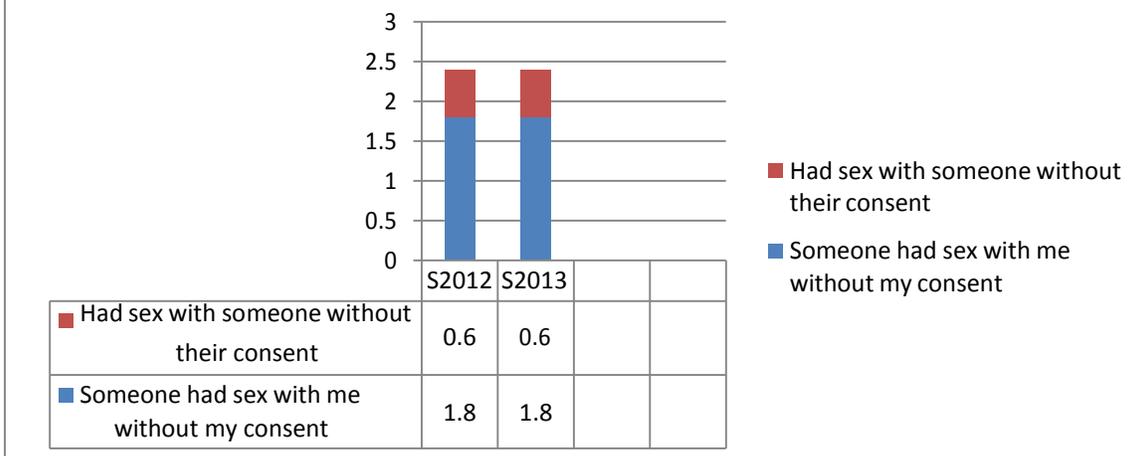
Attachments:

1. ACHA-National College Health Assessment Sexual Assault - Data Points
2. 21 Feb 14 Comments for Task Force Letter, Dr. Donna Barry

# ACHA-National College Health Assessment Sexual Assault - Data Points



## Within the past 12 months, have you experienced any of the following when drinking alcohol?



**Subject:**Comments for Task Force

**Date:**Fri, 21 Feb 2014 14:04:47 -0500

**From:**Donna Barry <[barryd@mail.montclair.edu](mailto:barryd@mail.montclair.edu)>

**Organization:**Montclair State University

**To:**[ovw.sataskforce@usdoj.gov](mailto:ovw.sataskforce@usdoj.gov)

Taskforce Members,

I was unable to participate in some of the listening sessions so would like to offer my thoughts via email. As a campus medical provider, forensic nurse, IHE administrator, former OVW campus grant recipient, national speaker/consultant on sexual violence, and the Co-author of the book *Campus Sexual Assault Response Teams: Program Development and Operational Management*, my experience lends itself to speak from a national expert perspective as well as that of advocate, responder, educator, and administrator. Thus, my comments are as follows:

- As IHEs, we all need to follow OVW campus grant recipient requirements to develop comprehensive, coordinated response systems. Research has demonstrated that community response systems in the form of Sexual Assault Response Teams (SART) are victim-centered and highly effective in providing comprehensive services as well as supporting the investigation and prosecution efforts to hold offenders accountable. My experience has been that all institutions have the ability to either establish solid team relationships with community SARTs to effectively care for students or develop their own campus system modeled after community SARTs.
- In order to increase transparency at IHEs, our administrators including Presidents, Chancellors, and Provosts need an increased awareness of:
  - An increase in reporting of assaults reflects a campus in which students feel safe in disclosing incidents and trust that we will do the right thing
  - There is a much greater liability in non transparency. If we do what is right, are compliant with federal and state regulations, and follow procedures that are fair and equitable, the risk of lawsuits significantly diminish. Media will do far more damage when information is withheld.
  - All IHEs are experiencing the endemic of sexual violence and the impact on academic success and retention is significant which in turn can cause a domino effect on national rankings, reports, and surveys.
  - This is not an issue for Student Affairs and Conduct professionals to face - it involves the entire campus professional campus community
- It is a great misnomer that our campuses are unsafe. Statistics will demonstrate that, for the most part, crimes are committed much less on college campuses than within the community. The type of sexual violence we see occurs among acquaintances in the privacy of a room or apartment. What we need to provide is significant training to our Public Safety and Law Enforcement officer in understanding victim and offender behaviors, response and interviewing skills, and investigative procedures, not just additional patrol officers. All campuses, whether sworn officers or public safety need strong and effective working relationships with municipal agencies and DA/prosecutor offices in the form of written MOUs and be afforded the credibility they deserve as protectors of our communities.
- At the federal level, campuses need significant and clear guidance on how federal regulations intersect. Based on interpretation (and that will vary depending on which legal authority or OCR member is questioned), we are all struggling to do the right thing with one fear in mind - a loss of funding and fines. In the process, campuses are losing sight of the spirit of the laws created - they were created to reduce crime and to better serve victims. Title IX and Clery are our friends, not enemies. If we implement their mandates and recommendations, we will accomplish the needed transparency of our institutions, have effective policies and procedures in place, and create safer communities. However further and immediate guidance is desperately needed in order to do so.

Thank you all for the opportunity to share these thoughts and recommendations. If there are questions of clarifications needed, please do not hesitate to reach out to me. I look forward to the outcome of your work.

Sincerely,

Dr. Donna M. Barry, APN, FN-CSA, DNP  
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 Co-Administrator, University SART  
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