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# Women's Justice Center

## Centro de Justicia Para Mujeres

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April 9, 2014

White House Task Force to  
Protect Students from Sexual Assault  
United States Department of Justice  
Office on Violence Against Women  
145 N Street NE  
Suite 10W.121  
Washington, DC 20530

Re: Recommendation to the White House Task Force to Protect Students from Sexual Assault,  
Eliminate the conflict of interest

Dear Task Force Members,

We want to support the recommendations submitted by RAINN and by the National Sexual Violence Resource Center. We would also like to add one additional recommendation not included in those submissions, a restructuring of campus sexual assault services that we believe is essential for successful implementation of any of the other recommendations.

**Recommendation:**

The key responders to campus sexual assault - the police, advocates, counselors, title IX coordinators, and others, - should be independent of campus administration and financing, for the same reason that institutional independence is deemed essential for proper response to sexual assaults that occur in the military and in the Catholic church. This independence is needed to avoid the inherent and profound conflict of interest that exists when campus responders are employed and supervised by the very same institution that has such overpowering financial interests in protecting its 'reputation' and in suppressing the number, the problem, and reports of sexual assaults.

**The Problem:**

This task force was formed due to the inordinately high rate of sexual assaults and low rate of adequate responses to those assaults on our college and university campuses.

The problem of poor response to sexual assault, of course, exists everywhere, and everywhere the problem requires a full spectrum of strong remedies. We believe one of the main factors contributing to the particular gravity of this problem on campuses is that, unlike responders to sexual assaults in the community at large, the responders to campus sexual assaults are mostly all hired, supervised, and paid by the very colleges and universities that, at the same time, have enormous financial interest in suppressing the reports of sexual assaults at their institution, if for no other reason than to convince parents of potential students that their institution is a safe place to send their kids. This creates an unworkable conflict of interest in which the campus police, advocates, counselors, title IX coordinators, and other campus sexual assault responders must operate.

It is impossible to at once expect the same institutions that have such a strong financial interest in hushing up the problem of sexual assault to properly provide the visibility, accountability, and public documentation essential to providing adequate response to and prevention of sexual assault.

The direct and dire consequences of this built-in conflict of interest on our campuses are, not surprisingly, much the same as the consequences seen in the military and the Catholic church. At best, sexual assault victims are steered into soft, quiet, ineffective, and unjust responses, such as mediation, counseling, and informal, off-the-record processes. At worst, as happens far too often, the victims are vilified and retaliated against for reporting. Far too many campus sexual assault victims, as has been well recorded, are shunned to the extent they feel they must leave the school. Almost always, the justice and protection that are essential for proper response and prevention are denied.

In order to eliminate the conflict of interest, adequate firewalls must be constructed between the administration, supervision, and payroll of campus sexual assault responders, particularly campus police, and the educational institutions where they work. As a stop-gap measure victims of campus sexual assault should be informed of, and given the option of going directly to off-campus sexual assault services.

Thank you for your attention and your work,

Sincerely,

Marie De Santis  
Director