"How is a Student to Know Who They Can Talk To?": University Website Communication about Sexual Assault in the Context of Compelled Disclosure

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Abstract: Compelled disclosure policies require many U.S. higher education employees to report all disclosures of sexual violence. These federally mandated policies make it important that student-survivors understand the implications of disclosures. We analyzed how university websites communicated information about compelled disclosure to students in 2017 and 2022, finding that

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websites 1) often lacked information about compelled disclosure policies, 2) discussed confidentiality in inaccurate or confusing ways, and 3) did not clearly indicate when access to resources was contingent upon reporting. In both university policy and website design, administrators should recognize that web communication about reporting and available resources may facilitate and/or impede a survivor's ability to make agentic choices. Administrators should seek to design websites that prioritize survivor agency and control. Because a survivor's path to healing may not involve formal reporting, this means that transparent communication about compelled disclosure policies and visible access to confidential resources are key.

This website was a joke and the hardest to follow. There is no way I would be able to successfully understand how to report sexual misconduct if I was a student here. The website does not even mention responsible employees or confidential resources. How is a student to know who they can talk to?
—Undergraduate student coder, comment on a university website

How a university responds to disclosures of sexual assault influences the effects the assault has on the survivor. These effects are complex and vary across survivors and disclosures (Ahrens et al., 2009; Kirkner et al., 2021; Nikulina et al., 2019; Relyea & Ullman, 2015; Ullman, 2021), but evidence suggests that negative reactions on the part of a university can intensify

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symptoms of mental illness, self-blame, and maladaptive coping (Ahrens, 2006; Dworkin et al., 2019; Harris, 2020; Lorenz & O'Callaghan, 2022; Orchowski et al., 2013; Ullman, 2021). Positive social support, however, can mitigate the harms of sexual assault (Ahrens et al., 2009; Borja et al., 2006; Dworkin et al., 2019; Orchowski et al., 2013; Orchowski & Gidycz, 2015; Ullman, 2021). These effects operate at both interpersonal and organizational levels. In higher education, when universities fail to respond supportively to sexual harm, they may exacerbate those harms in what Smith and Freyd (2013, 2014) refer to as "institutional betrayal." This intensification of harm occurs when school responses violate students' expectations of, and trust in, an organization on which they depend (e.g., Bedera, 2021; Lorenz et al., 2022; Nightingale, 2021).

United States colleges and universities operate in a legal environment that constrains their ability to respond to student sexual assault in a survivor-centric way. For decades, federal regulations under Title IX have obligated universities to require some employees to report information—including identifying information—about student sexual misconduct to university officials, regardless of survivor desires (Cantalupo, 2011; Dauber & Warner, 2019; U.S. Department of Education [ED] 1997; Weiner 2017). Proponents argue that such "compelled disclosure" policies improve a school's ability to prevent and remedy sexual assault, as administrators must be aware of misconduct in order to respond. Critics, including many survivors and their advocates, argue that these policies embody survivors' fears of loss of control. Students who fear the impact of the policies may therefore shy away from disclosure (Brodsky, 2018; Cantalupo, 2011; Holland et al., 2018, 2019; Mancini, 2022; Newins & White, 2018; Weiss & Lasky, 2017). Employees with compelled disclosure duties often worry that these policies may sabotage their relationships with student-survivors who trust them enough to disclose (Brubaker & Mancini, 2017; Cabrera, 2020; Holland, 2019; Holland & Cortina, 2017; Holland et al., 2019; Holland et al., 2020b; Javorka & Campbell, 2019). Others argue that these policies do "little to change the institutional context that allows sexual misconduct to flourish" (Miron & Palacios, 2018, p. 4).

The existence of these policies creates a responsibility for schools to explain the policies to students. Accurate information enables student-survivors to make informed decisions. Poor communication can deter survivors from seeking resources, or worse, generate inadvertent reporting, embroiling survivors in adjudication processes without their consent (Holland et al., 2018, 2020a; Porter, 2022). This communication is delicate, as seeking help after sexual assault consists of fragile steps, with survivors often retreating when they do not receive appropriate information or experience negative reactions (Ahrens, 2006; Ahrens & Aldana, 2012).

University websites can be an important resource for students seeking information and resources about sexual assault (Munro-Kramer et al., 2017).

Internet use is widespread among college students (Smith et al., 2011), including for learning about sexual health (Levine, 2011). Research indicates that most university websites provide some information about sexual assault, but content on subjects relevant to disclosure, such as confidentiality, is often missing (Dunlap et al., 2018; Englander et al., 2016; Franklin et al., 2016; Graham et al., 2017; Hayes-Smith & Hayes-Smith, 2009; Krivoshey et al., 2013; Schwartz et al., 2015; Simmons & Clay, 2019). Yet, to our knowledge, no scholarship has qualitatively investigated the *clarity* of university online communication about compelled disclosure (Moylan & Javorka, 2020, p. 181). We explore this issue by investigating *how* universities communicate sexual assault reporting and resources on student-facing websites, focusing on information that research indicates is most important to survivors.

Disclosure and Survivor Healing

Relatively few survivors formally report sexual assault, and many do not disclose to family or friends (McMahon & Seabrook, 2020; Mennicke et al., 2021; Sabina & Ho, 2014; Spencer et al., 2020). Students searching their school's website for information may not have labeled their experience as sexual assault, even if it meets legal or school policy definitions. The website—including both its content and its design—may influence the process of working through what may be a confusing and traumatic experience. We suggest that a survivor's search for information on sexual assault on a school website may be considered a form of disclosure in and of itself.

Survivor-centric webpage design can draw on the substantial body of research that has examined survivor reactions to disclosures of sexual assault (Dworkin et al., 2019; Freyd, 2022a; Harris et al., 2020; Holland et al., 2020a, 2021; Sabina & Ho, 2014). This research highlights the importance of survivor agency. In the context of compelled disclosure policies, two aspects of survivor agency become particularly important: protecting confidentiality and validating various help-seeking choices. We therefore suggest that webpages are survivor-centric to the degree that they facilitate survivor agency, particularly in terms of providing transparent and comprehensible information about confidentiality and providing different avenues to seek help.[1]

Researchers, advocates, and survivors identify the need for agency in deciding whether and to whom to disclose or report (Brubaker & Mancini, 2017; Frazier et al., 2017; Holland et al., 2020a, 2020b; Kirkner et al., 2021; Munro-Kramer et al., 2017; Orchowski & Gidycz, 2015; Orchowski et al., 2013; Richards et al., 2021). Lack of control over institutional responses is one of the most damaging possible consequences of reporting or disclosure,

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[1]See the Results section for an analysis of concrete examples and how they are or are not survivor centric.

perhaps because it mirrors the lack of autonomy experienced during the assault (Dworkin et al., 2019; Gidycz et al., 2015). In a context where some individuals are compelled to report—by which we mean communicating identifiable information about sexual harm to an authority without survivor consent—protecting survivor agency requires providing enough information to enable survivors to decide whether speaking to a particular party aligns with their goals (Holland et al., 2020a). Information that is comprehensible, easy to find, and that speaks directly to survivor concerns is more likely to enable agency (Munro-Kramer et al., 2017).

Student-survivors often fear the spread of sensitive information (Banyard & Mayhew, 2009; Holland & Cortina, 2017; Krebs et al., 2011; Lindquist et al., 2016; Munro, 2014; Nasta et al., 2005; Sable et al., 2006; Walsh et al., 2010). Therefore, agency includes being able to control the flow of information. Exposure may put survivors at risk socially and physically, through social ostracization and/or retaliation by the perpetrator and/or the community (Khan et al., 2018; Sable et al., 2006). These concerns are greater for students with marginalized identities (e.g., Cantalupo, 2019; Hakimi et al., 2018; Porter, 2022).

To control the flow of information, survivors must depend on schools to define relevant terms clearly and use them accurately, particularly regarding confidentiality. Confidential resources generally refer to employees exempted by law and/or policy from reporting obligations (ED, 2011, 2014a, 2016, 2020a, 2020b, 2022). They require the consent of the survivor to share disclosures, although even they must report under some conditions, such as when risks to the survivor or the community are assessed to be high. Non-confidential resources may share disclosures without the survivor's consent—and may be compelled to do so (e.g., Title IX coordinators may share identifiable information with police, Deans of Students, investigators, etc.). Student-survivors need accurate information about who is a confidential source and who must report, and what happens to information if someone must report (Munro-Kramer et al., 2017). A good student-facing website can provide clear, accurate information on the limits of confidentiality of various employees and offices.

Survivor agency is validated if websites clearly offer multiple strategies for seeking help. Research suggests that survivors are aware of the potential costs of reporting assaults and choose their actions accordingly (Khan et al., 2018). Reporting may lead to social costs, unwanted consequences for perpetrators, and institutional processes that retraumatize survivors (Ahrens, 2006; Holland & Cortina, 2017; Khan et al., 2018; Lorenz et al., 2018; Porter, 2022). Even if formal processes work well, survivors may not want to engage. They may simply want resources and/or space to process their experiences (Kirkner et al., 2021). In the presence of compelled disclosure policies,

survivors should ideally have access to resources independent of reporting pathways (e.g., Title IX offices). If access to a particular resource is dependent on reporting, it is crucial to communicate this clearly so survivors can elect to seek resources elsewhere.

OBSTACLES TO SURVIVOR-CENTERED COMMUNICATION

Universities create websites in a complex legal and organizational context, often with limited resources—and with interests distinct from those of survivors. This context creates challenges to the production of survivor-centered communication about compelled disclosure.

First, compelled disclosure laws are complex and confusing (Weiner, 2017). There are many terms with specific legal meanings, including "responsible employee," "mandatory reporter," and "campus security authority," as well as an overlapping sets of laws and guidance at both federal and state levels (Javorka & Campbell, 2019). At the federal level, the 1990 Clery Act compelled disclosure of information about a variety of crimes, with only some confidentiality protections (ED, 2020b).[2] Since the 2013 reauthorization of the Violence Against Women Act (VAWA), these crimes have included sexual assault and other forms of gender-based violence and harassment (ED, 2014b). Title IX regulations require schools to compel disclosure in ways that identify the survivor and can initiate disciplinary processes at the discretion of the school's Title IX coordinator (Richards et al., 2021; ED, 1997).[3] This body of law—and how to interpret it—continues to be in rapid flux (Dauber & Warner, 2019; ED, 2020a, 2021, 2022; Weiner, 2017). In addition, there are applicable state laws, including mandatory reporting laws that cover children, and professional ethical codes governing particular groups of professionals (Javorka & Campbell, 2019).

Second, in recent years, "the overwhelming majority of institutions" have adopted "universal" or "wide-net" reporting policies requiring almost all employees to report the incidents of sexual misconduct of which they are aware (Weiner, 2017, p. 77; see also Holland et al., 2018). They have adopted these policies even without being legally required to do so.[4] Weiner (2017) argues

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[2]ED previously issued guidance indicating that Clery Act public crime reporting requirements could be met without disclosing the survivor's identity "in most cases" and that counselors were exempt from public crime reporting requirements (ED, 2016, pp. 4-7, 4-8). However, ED rescinded this guidance in 2020, replacing it with a much less detailed "appendix" with fewer confidentiality protections (ED, 2020a).

[3]Compelled disclosure requirements were specified in ED's 1997 Title IX guidance. ED's 2014 "Questions and Answers on Title IX" document built upon the 1997 guidance but were rescinded in 2017 (ED, 2014a).

[4]Obama-era federal guidance about which employees had compelled disclosure duties was broad and vague (ED, 2014a), and 2020 regulations allowed schools to assign reporting

that this shift has been driven by trade publications, professional organizations, external counsel, and mimicry. High-profile scandals in which reports of sexual abuse were ignored and suppressed likely accelerated this trend (Mancini et al., 2016). Wide-net reporting policies trade survivor agency for simplicity and regulatory compliance. Furthermore, from 2011 forward, federal regulations increasingly moved toward situating the responsibility for coordinating "supportive measures" (e.g., changing a course schedule or residence hall assignment) in Title IX offices, making these measures inaccessible to those who wish to avoid involvement with Title IX (ED, 2022).[5]

This policy context means that schools' interests in reports might not align with survivors' needs for agency, confidentiality, and validation of multiple help-seeking pathways. Units charged with protecting schools from liability (e.g., Office of General Counsel) may have more power than units focused on meeting the needs of individual survivors (e.g., sexual assault centers, women's centers). Liability-focused units may have interests in collating reports of sexual assault, as reports can help universities assess risk and make changes to protect future students (Brubaker & Keegan, 2019; Cabrera, 2020; Moylan, 2017). Policies that assign reporting obligations to virtually all employees further these organizational imperatives. This may lead to websites that prioritize channeling survivors toward reporting over supporting their agency.

This context leads us to expect that universities may struggle to develop survivor-centered websites that communicate effectively with survivors about their options. Studies of information about sexual assault on university websites suggest that this information is often incomplete. Most, but not all, schools provide at least some online information about sexual assault, particularly with respect to the school's sexual misconduct policy, reporting to police, and resources for survivors, including confidential resources (Bedera & Nordmeyer, 2015; Dunlap et al., 2018; Englander et al., 2016; Hayes-Smith & Hayes-Smith, 2009; Krivoshey et al., 2013; Lund & Thomas, 2015; Schulz, 2021; Simmons & Clay, 2019; Simmons et al., 2020). Most relevant for the present study, Dunlap et al. (2018) found that in late 2015 to early 2016, less than half of schools in two unnamed elite higher education associations provided online information about the differences between a disclosure and

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obligations to fewer employees (ED, 2020b). Proposed regulations (under consideration at the time of this writing) assert a "tentative position" that all non-confidential employees should have such obligations (ED, 2022, pp. 177-183).

[5]Current regulations define supportive measures as "nondisciplinary, nonpunitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or when no formal complaint has been filed"; proposed regulations would keep this definition, with some "clarifying amendments" (ED, 2022, pp. 114-115).

a report, or between privacy and confidentiality, and only 36% provided an anonymous reporting option. The in-depth critical discourse analysis by Schulz (2021) of two school websites found significant differences in their approaches: one school used a "risk management" approach that emphasized reporting, while the other emphasized confidentiality but was uneven in its language and consistency.

This study seeks to build on these studies by qualitatively investigating *how* school websites communicate about sexual assault resources and reporting with a nationally representative sample. Specifically, we analyzed the content and clarity of the language involving sexual assault resources and reporting on schools' websites from a survivor-centric perspective.

Methodology, Data, and Methods

We conducted two waves of content analysis of websites representative of a nationally stratified sample of schools, in 2017 and 2022. We initially intended to perform a straightforward quantitative content analysis of the types of information present on school websites. However, our initial coding revealed that the meaning of the information was not obvious to undergraduates, leading us to move into a more inductive and qualitative analysis (Drisko & Maschi, 2016; Hsieh & Shannon, 2005; Krippendorff, 2019; Morgan, 1993). We subsequently combined these quantitative and qualitative approaches for both waves of our data.

Sample

We constructed a nationally representative sample of 381 schools drawn from the population of degree-granting, public or private not-for-profit, 4-year and above colleges and universities with undergraduate enrollments of 900 or more. U.S. higher education is characterized by an intense focus on status, resulting in disproportionate influence of higher-prestige schools (e.g., Brewer et al., 2002; Taylor & Cantwell, 2019). Therefore, we oversampled schools with national prominence to ensure inclusion of trend-setters.[6] To do this, we drew both a simple random sample of 298 schools and a certainty sample of 114 schools that included all Ivy League institutions; every state's flagship public research university; schools in the Big 10, Big 12, New England Small College Athletic Conference (NESCAC), and Peach Belt athletic conferences; and the most selective historically Black colleges and universities (HBCUs), women's colleges, and Christian colleges.[7] We dropped one

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[6]These patterns did not have a significant effect on the findings we share here, as results for the simple random sample alone do not vary meaningfully from the full sample (results available on request).

[7]Thirty-one schools in the certainty sample were already included in the simple random sample; therefore, the certainty sample added 83 schools to the study.

school because its website PDF files became corrupted, making the final sample size 380 schools. We conducted two waves of data collection and analysis: Wave 1 examined the websites of all 380 schools as of 2017, and Wave 2 sought to check whether the same patterns held five years later by examining the websites of a simple random subsample of 50 schools out of the original 380 as of 2022.[8]

Data Collection

The first wave of data collection was completed in 2017, after Trump's election but before the Department of Education rescinded Obama-era Title IX guidance in September 2017. We collected online communication created for students seeking resources after a sexual assault, including how to report it. Trained undergraduate data collectors systematically searched websites for pages that mentioned terms that student-survivors might use (e.g., sexual misconduct, sexual assault, Title IX). We went to great lengths to find all webpages relevant to reporting sexual assault and resources for student-survivors. Research on school websites have used both school websites' own search engines (e.g., Krivoshey et al., 2013) and Google (Lund & Thomas, 2015); our data collectors used both. Data collectors scanned the search results for relevant pages and scanned those pages for links to other relevant pages. To maintain our focus on student-facing material, we excluded sexual misconduct policies unless they had been translated into user-friendly webpages. Because webpages may be updated at any time, our data collectors "froze" schools' webpages as they were at the time of data collection by capturing it as a PDF (Karlsson & Strömbäck, 2010; Zamith, 2017). When the list of relevant webpages was finalized, each school's pages were assembled into a single PDF for coding.

The first two authors conducted the second wave of data collection in summer 2022, without the involvement of undergraduate data collectors to examine how the patterns we observed had changed after five years. We used the original decision rules to decide what material to code. To streamline the analysis and allow a qualitative evaluation of the structure and feel of each website, we searched and browsed the websites directly, freezing only the webpages used as examples below.

Data Analysis

We used content analysis to analyze school websites, iteratively adapting our analytic strategy as we learned about the nature of the data. Content

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[8]Our two waves of data are therefore separated by the outbreak of COVID. The pandemic did not emerge as an important factor in our analysis, as it did not seem to generate changes in web communication about sexual assault. However, the pandemic has had a wide range of effects on higher education that are only beginning to be understood. This may be a topic for future research.

analysis employs a flexible method that includes a variety of approaches that vary depending on the degree to which meaning is assumed to be inherent in the text. Assuming the meaning of the text to be obvious and consistent across observers allows for quantitative content analyses that seek to provide objective descriptions. By contrast, qualitative content analyses assume that the same text can provide multiple meanings depending on context, audience, and other factors (Drisko & Maschi, 2016; Hsieh & Shannon, 2005; Krippendorff, 2019). We began our Wave 1 analysis with the assumption that the content was fundamentally obvious and therefore a ready fit for quantitative analysis. However, it became clear this was not the case. We therefore pivoted toward a qualitative content analysis that sought to identify how and why the texts might be interpreted differently. Our Wave 2 analysis then examined whether the patterns we identified in Wave 1 were still present five years later.

When we began the Wave 1 analysis, our primary goal was to measure compliance with federal policy requirements and recommendations. We created a coding instrument designed to measure the presence or absence of information called for by federal guidance at the time, including items on compelled disclosure requirements, confidentiality, and the relationship between reporting and resources (ED, 2011, 2014a; White House Task Force to Protect Students from Sexual Assault, 2014). This "basic" or "directed" content analysis sought to straightforwardly quantify the prevalence of information, similar to other studies of school websites (Drisko & Maschi, 2016; Dunlap et al., 2018; Hsieh & Shannon, 2005).

Unlike most studies of school websites where researchers perform the coding (e.g., Dunlap et al., 2018), we recruited undergraduates to code the website data. We reasoned that because undergraduates are a critical audience for these websites, they would be appropriate analysts of website content. Undergraduate coders went through a group training, had access to an extensive coding guide, and performed their coding in person in a lab with a graduate student supervisor who could answer questions. The coding instrument was programmed into Qualtrics so that coders could enter their codes electronically; most items were accompanied by open-ended text questions where coders could copy the webpage text that informed their codes. Three undergraduate coders independently coded the webpages for each university from fall 2017 through summer 2018.

Throughout this time, we gathered important qualitative insights from our undergraduate coders through the reactions and observations they shared with us. Coders often voiced frustration with school websites to graduate student supervisors, usually focused on websites' lack of information and confusing or insensitive language. The coding instrument included open-ended items where undergraduates could share their thoughts on what aspects of the school's website would be helpful or unhelpful for students (the epigraph for this article is drawn from this data). These observations were invaluable to

the research team as we developed our understanding of how these websites might be interpreted by student-survivors. Consistent with coder frustration, we found that despite our efforts to ensure reliability, intercoder agreement was low, at 37% ($n = 193$) to 75% ($n = 380$) across items.

These findings led us to move to qualitative content analysis to understand why school webpages were confusing to undergraduates (Drisko & Maschi, 2016; Hsieh & Shannon, 2005). We enlisted a team of four experienced undergraduate and graduate students who reviewed the codes for each school, along with webpage text that the original coders had captured. In considering the meaning of webpage language, we focused on identifying potential disconnects between what was written (or left out) and what might be misunderstood. Through this review, which was supplemented by regular meetings and asynchronous discussion, we determined that the webpages were not just confusing to students, but were confusing to any audience, as information was often contradictory, incomplete, or legalistic. We identified reasons original coders may have coded the same material in different ways. For example, we originally coded for the presence of information about compelled disclosure, but what if compelled disclosure was vaguely alluded to, but never fully explained? What if a webpage explained that disclosures to an employee must be reported, but not to whom? What if webpages said a report was not required to access support, but directed survivors to the Title IX office to access resources?

The qualitative content analysis led to a more robust coding scheme that allowed us to code more consistently. The cleaning team coded a randomly selected subsample of 40 schools with 90%–95% agreement across our original items; subsequently, a single team member cleaned each of the remaining 340 schools. We performed additional coding for key examples of confusing language or lack of information. The codes used in each stage of our analysis are shown in Table 1.

Our qualitative content analysis therefore led to a shift in the purpose of our coding. Whereas we had begun with a goal of measuring compliance by quantifying the prevalence of information, our quantitative coding became a way to concretize our qualitative finding of coder confusion. By the completion of our Wave 1 analysis, we had obtained both quantitative counts and qualitative examples of the information that we were attempting to describe.

The Wave 2 analysis sought to update the Wave 1 analysis, checking whether websites had changed substantially after five years. The first two authors used the refined coding scheme to code a random subsample of 50 schools. The smaller sample size allowed us to attend to the overall structure of each website, including overall emphasis, and depth of information. We developed these qualitative analyses through discussions and brief memos reflecting on each website. We found 2017 patterns were still present in 2022, with some expected variation. Statistical testing showed that variation between waves

TABLE 1.
QUESTIONS CODED BY STAGE OF CODING

Does the school's website…	Wave 1 deductive coding	Wave 1 interpretive analysis	Wave 2
Agency			
Mention compelled disclosure?	X		X
Identify to whom the compelled disclosure would be reported?		X	X
Explain how survivor wishes would be considered after a compelled disclosure was formally reported to the school?		X	X
Use language similar to ED's definition of a responsible employee?		X	X
Confidentiality			
Provide information on confidential resources?	X		X
Use the phrase "confidential reporting"?		X	X
Reporting versus resources			
List potential accommodations that are available to survivors?	X		X
Advise that survivors do NOT need to formally report sexual misconduct to receive any of these accommodations?	X		X

was not significant for six of our eight indicators; the statistically significant differences do not change our substantive claims.[9] The sample sizes for the statistics presented below are 380 for Wave 1 and 50 for Wave 2.

Our findings deploy quantitative counts alongside qualitative examples, with the goal of integrating across them to produce a thick description of the messiness that survivors may encounter on their school's website. For our qualitative examples, we identify schools by name for transparency and to support replicability, rather than to problematize particular schools (for a discussion of masking in ethnographic contexts, see Jerolmack & Murphy, 2019). All examples provided are from websites live as of summer 2022. Similarly, all general empirical claims have been substantiated through analysis of the 2022 data.

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[9]Statistical testing was performed via logistic regressions of each quantitative code (e.g., whether the school's website mentioned compelled disclosure) on an indicator for Wave 2, using the pooled Wave 1 and Wave 2 datasets. We used clustered standard errors to account for the fact that the Wave 1 and Wave 2 samples were not independent (i.e., schools in the Wave 2 sample were also in the Wave 1 sample).

Results

We found that student-facing information provided on university websites often: 1) constrained survivor agency through lack of information about compelled disclosure policies, 2) discussed confidentiality in inaccurate or confusing ways, and 3) did not state clearly when access to resources was (or was not) contingent upon reporting. School websites often omitted key information or used language that a first-year college student might not understand. The overall structure of many websites channeled survivors toward reporting rather than leading with confidential support and the validation of multiple help-seeking strategies.

Undermining Survivor Agency

To act with agency, survivors must understand the implications of disclosures they might make. In line with other studies that have found gaps in the information schools provide about sexual misconduct policies (e.g., Dunlap et al., 2018), we found that roughly two-thirds (68% in 2017, 66% in 2022) of school websites mentioned that some employees must report incidents of the sexual misconduct they become aware of (see Table 2 for a summary of the quantitative results).[10]

Of the schools that mentioned compelled disclosure on student-facing webpages, many did not explain what would happen once a sexual assault was disclosed to an employee with compelled disclosure duties. For instance, Grand View University's website stated that "all Grand View staff and faculty, with the exception of confidential counselors and the campus pastor, are required to report disclosures of sexual misconduct to the Title IX coordinator" (Grand View University, n.d.). This sentence helpfully indicates to whom the disclosure would be reported, information present on only roughly half of websites (44% in 2017; 58% in 2022). The next sentence affirms the school's commitment to protecting student privacy, followed by an explanation stating that "information will be shared only with those individuals who have a legitimate need to know the information in order to assist in the response, investigation, and resolution of the concern" (Grand View University, n.d.). The sentence implies that a report may trigger an investigation irrespective of survivor wishes, but even this is unclear, as the language of "choice" is used in the preceding and following paragraphs. Only a few websites (8% in 2017; 18% in 2022) explained how survivor wishes would be considered after a compelled disclosure resulted in a report.

Some schools attempted to distinguish between a report of sexual misconduct reaching the Title IX coordinator and the initiation of an investiga-

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[10]Schools that did not mention compelled disclosure usually assigned reporting responsibilities to virtually all employees but buried this information in sexual misconduct policies rather than explaining it on student-facing webpages.

Table 2.
Quantitative Findings by Wave of Study

Does the school's website…	Wave 1 (N = 380)	Wave 2 (N = 50)
Agency		
Mention compelled disclosure	68.4%	66.0%
Identify to whom the compelled disclosure would be reported?	44.5%	58.0%
Explain how the survivor's wishes would be considered after a compelled disclosure was formally reported to the school?	8.2%	18.0%*
Use language similar to ED's definition of a responsible employee?	7.6%	6.0%
Confidentiality		
Provide information on confidential resources?	84.7%	86.0%
Use the phrase "confidential reporting"?	19.5%	28.0%
Validation		
List potential accommodations that are available to survivors?	75.5%	78.0%
Advise that survivors do NOT need to formally report sexual misconduct in order to receive any of these accommodations?	27.1%	40.0%*

* $p < 0.05$.

tion but struggled to make this clear. For instance, Wentworth Institute of Technology's website tried to delineate between a "report" and a "complaint":

> Upon receipt of a report, the Title IX Coordinator, or designee, will promptly contact the Complainant and provide the following: information on the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, the ability to receive supportive measures with or without filing a report, and information about the process for filing a formal complaint. (Wentworth Institute of Technology, n.d., para. 3)

This sentence uses the word "report" to describe both the disclosure ("upon receipt of a report") and the complaint ("with or without filing a report"). Critically, websites were rarely clear that the school could decide to initiate an investigation without the survivor's consent. For instance, a Georgia Southern University webpage stated that after a report was filed, "the Complainant must indicate in writing to the Title IX Coordinator if they wish for the report to move into the investigation phase of the Sexual Misconduct process" (Georgia Southern University, 2021, Complaint Intake section). Only on a different page did the school mention that the Title IX coordinator

could elect to initiate an investigation even if the complainant stated they did not want the incident investigated (Georgia Southern University, 2021, Investigation section).

A small proportion of schools used legalistic language that college students might not understand. For example, Pennsylvania State University (2020) explained that:

> A responsible employee is a University employee who has the authority to take action to redress sexual violence; who has been given the duty of reporting incidents of sexual violence, sexual harassment, or any other misconduct covered by University policy AD85 to the Title IX Coordinator; or who a student could reasonably believe has this authority or duty. (Responsible Employees section)

This definition hews closely to language used in past ED guidance.[11] Students may not be able to parse such legalese, and if they could, they may not understand the organization of their school well enough to make this concrete. Eight percent of the 2017 sample and 6% of the 2022 sample used similar language, including defining "responsible employees" as employees who students might "reasonably believe" had certain authorities or duties. These schools effectively passed the burden of interpreting federal guidance on to their students and employees.

Missing or Confusing Information About Confidentiality

Confidential disclosures cannot be shared without the survivor's consent, giving survivors control over the flow of information, a critical aspect of agency. The vast majority of websites (85% as of 2017, 86% as of 2022) provided information about confidential resources, although a nontrivial portion did not.

Schools lacking confidential resources generally provided little other information about sexual assault on their websites. For example, Belhaven University's online information about sexual assault was provided on a single page of inconsistent, legalistic information (Belhaven University, n.d.). In rare cases, the information was even incorrect. For instance, Bay Path University's website tells students that they "may meet with the Title IX Coordinator confidentially, with no obligation to file a formal report" (Bay Path University, n.d.-b). But as the Title IX Coordinator may initiate an investigation against student wishes, they cannot promise confidentiality. Similarly, Bay Path University labeled campus police as confidential (Bay Path University, n.d.-a).

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[11]Rescinded ED guidance issued in 2014 defines a responsible employee as "any employee: who has the authority to take action to redress sexual violence; who has been given the duty of reporting incidents of sexual violence or any other misconduct by students to the Title IX coordinator or other appropriate school designee; or whom a student could reasonably believe has this authority or duty" (ED, 2014a, p. 15).

Websites varied in the detail they provided about limits to confidentiality that resources could provide. Confidentiality is complicated by exceptions for mandatory reporting of child abuse, threat of harm of self or others, and Clery Act requirements for reporting crime statistics. Some schools, such as South Dakota State University, labeled resources as confidential but did not explain what that meant (South Dakota State University, n.d.). Attempts to explain limitations to confidentiality could be vague or confusing, as with a video posted by Cabrini University advising survivors to "keep in mind [that] the degree in [sic] which confidentiality can be protected depends upon the situation and the role of the person being consulted" (Cabrini University, 2018). No further details were provided. In some cases, confidentiality was explained simply as an exception to compelled disclosure requirements, rather than as a way for survivors to control whether and how their disclosures would be shared. For example, the University of Kentucky's website stated that confidential resources "do not have any obligation to share a report with the Title IX Coordinator unless the affected individual asks them to" (University of Kentucky, n.d., "Who can I speak with confidentially?" section).

The meaning of "confidentiality" was particularly unclear in the phrase "confidential reporting," used in some manner on 20% of schools' websites in 2017 ($n = 380$) and 28% of schools' websites in 2022 ($n = 50$). "Report" is often used to describe a formal complaint, which requires investigation and an adjudication process. However, "report" can simply mean to disclose, without expectation of an institutional response—and indeed, perhaps with an expectation of confidentiality. "Confidential reporting" is therefore an ambiguous term.

The types of resources presented as "confidential reporting" varied across schools, and sometimes within them. "Confidential reporting" sometimes referred to confidential resources, apparently using "report" in the broader sense of any disclosure. For example, SUNY Polytechnic Institute explained that "Confidential Reporting Options" meant "to disclose *confidentially* an incident to one of the following college officials, who by law may maintain confidentiality, and can assist in obtaining services" (emphasis in original, SUNY Polytechnic Institute, n.d.). In other cases, "confidential reporting" meant anonymous reporting. Anonymous reporting is confidential in the sense that a survivor can withhold their identity, but doing so also undermines the school's ability to follow up with resources. Anonymous reporting could also be confusing; Langston University's (n.d.) "confidential reporting" form stated that it was anonymous.[12] A 2017 version of this form included a field for the survivor's name without a clear statement that a name was not required (Langston University, 2017). Other schools advised survivors to make an

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[12]As of June 27, 2022, the form did not function, as the website was in the process of overhaul.

anonymous report to campus police, with few warning that the police might try to identify the reporter if the incident was judged to be serious.[13] In some cases, it was unclear what was "confidential" about "confidential reporting." For instance, the UMass Amherst Police Department describes itself "as a confidential resource for reporting and criminal investigation of incidents of sexual violence/harassment, relationship violence and stalking" (University of Massachusetts at Amherst, n.d., para. 1).

Linking Reporting and Resources

Access to resources without a risk of activating an investigatory process enables survivor autonomy. Resources are, however, frequently contingent upon Title IX and/or law enforcement awareness of the incident. As of 2020, the Department of Education explicitly stated that the Title IX Coordinator is responsible for coordinating supportive measures, although this was implied in earlier guidance.[14] Medical providers are often legally required to call the police, but amendments to VAWA in 2005 pushed states to eliminate widespread requirements that survivors report their assault to police to access forensic exams (Zweig et al., 2014). Schools varied with respect to whether they communicated about supportive measures, how they linked resources and reporting, and how well they communicated about these complex linkages.

Most websites alerted survivors to the availability of supportive measures (76% in 2017 and 78% in 2022). It is not clear if the more than 20% of schools that did not mention supportive measures on their websites provided them (as legally required). Many websites stated that a report was not required to access these resources (27% in 2017 and 40% in 2022). However, this did not mean that survivors could access supportive measures without the risk of triggering an unwanted investigation, as the Title IX coordinator could initiate one without the survivor's consent. The word "report" is tricky, as

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[13]UC-Berkeley's website, characterized by a high level of transparency, specifies that "in some cases, the University might be obliged to try to identify the anonymous reporter" (University of California at Berkeley, n.d.-a, Anonymous reporting section).

[14]The 2011 DCL stated that "Title IX requires a school to take steps to protect the complainant as necessary, including taking interim steps before the final outcome of the investigation. The school should undertake these steps promptly once it has notice of a sexual harassment or violence allegation" (ED, 2011, p. 15). Although this implicitly ties interim (supportive) measures to investigations, this language does not prevent schools from providing supportive measures outside of Title IX investigatory processes. Similarly, ED (2014a) listed "determining appropriate interim measures for a complainant upon learning of a report or complaint of sexual violence" as an "additional" responsibility that schools "may" give Title IX coordinators (p. 11). Compare this to the 2020 regulations statement that "the Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures" (ED, 2020b, p. 30574).

the meaning of the term is vague. It is unclear if "report" simply means that Title IX is aware of the incident or if the term only refers to incidents where the survivor requests an investigation. If one interprets "report" to mean placing Title IX on notice, supportive measures generally depend on a report.

Schools varied in how they handled the expectation that the Title IX office handled supportive measures. Baylor University, for example, explicitly and clearly tied receipt of supportive measures to reports by stating that supportive measures could be initiated "upon the receipt of a report of Prohibited Conduct" by the Title IX office (Baylor University, 2021, p. 14). They noted that these measures "may be provided at any time, regardless of whether an investigation and resolution process has been initiated or completed" (Baylor University, 2021, p. 15). Nonetheless, a report was the first step to receipt of supportive measures, suggesting that those not willing to risk an investigation could not receive such measures.

University of Tennessee tried to offer survivors options by stating that survivors "have support options regardless of your choice of reporting" (2022, para. 3). The webpage explained, "you have the right to decide how you choose to participate. Decisions to utilize supportive measures, engage in a formal complaint, police reporting, and anonymous reporting are all examples of measures that you can choose" (University of Tennessee, Knoxville, 2022, para. 4). This text creates a sense of survivor autonomy, but like many schools, University of Tennessee did not mention that survivors cannot control whether Title IX investigates after a report is made. Furthermore, it seems survivors cannot access supportive measures without putting Title IX on notice, as the webpage also stated that "the Office of Title IX can assist with supportive measures…" (University of Tennessee, Knoxville, 2022, para. 3). The phrasing above indicates that survivors have a choice about utilizing supportive measures offered by the university, but refrains from clearly stating that receiving such measures requires a report to Title IX.

Bates University's website clearly stated that the Title IX office is the place to get supportive measures and that the Title IX office is not confidential. They explain that the Title IX team can "a) provide information regarding the college's policies and procedures; b) assist in accessing other support services; and c) help arrange for supportive measures or other remedies" (Bates University, n.d., para. 1). The school website emphasized that "while not bound by confidentiality, these resources will maintain the privacy of an individual's information within the limited circle of those who need to know to assist with providing support services or resolving a report" (Bates University, n.d., para. 1). In a separate "How We Can Help" brochure, the school explained that survivors have the right to supportive measures and to "choose whether you wish to participate in any formal investigative process" (Bates University, 2021, p. 9). This implies that survivors do not have the right

to determine whether an investigative process occurs, only whether they participate in it. Students in crisis might struggle to piece together how Bates handles this issue. Unlike many schools, though, the relevant data is provided.

Some schools appeared to be searching for ways to separate supportive measures and investigatory processes. The University of Pennsylvania's website attempted to create a buffer between the Title IX office and survivors with respect to supportive measures. The school has created a separate office, Student Intervention Services (SIS), which:

> provides support to student victims/survivors; coordinates with schools, housing administrators, and other relevant offices at students' request; and connects students to appropriate support services. SIS respects the sensitivity of violence cases and can discreetly advocate for students with schools and other offices in the University. (University of Pennsylvania, n.d., "School Accommodations and Interim Measures" section)

The language used here is vague, perhaps deliberately so. They may be suggesting that SIS could arrange supportive measures without putting the Title IX office on notice of an incident. The meaning is, however, unclear.

Law enforcement was often linked with accessing resources as well. Websites frequently advised survivors to go to the police after being assaulted. For instance, the University of Georgia's landing page for "preventing and responding to sexual assault" recommended survivors contact the police "as soon as possible following a sexual assault" (University of Georgia, n.d., para. 2). Although the webpage assured survivors that "contacting the police does not commit or obligate the survivor to having the assault investigated or prosecuted," the page offered the police as a gateway to medical services, a sexual assault forensic exam, and confidential advocates (University of Georgia, n.d., para. 2). Only lower on the webpage were medical treatment and confidential resources described independently of the police.

Reporting to police and accessing medical resources can be difficult to separate because medical providers are often legally required to call the police. Many websites explained that reporting to the police was not required to access medical resources, or that survivors did not have to speak to police or file a police report even though healthcare providers were legally required to notify law enforcement. For example, Shorter University's (n.d.) website stated that "if a victim goes to the hospital, local police will be called, but s/he is not obligated to talk to the police or to pursue prosecution" ("Preserving Evidence" section).[15] However, websites were not always this clear. For example, an info sheet on California State University, Monterey Bay's (n.d.)

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[15]Some schools, like this one, used less gender-inclusive language ("s/he," indicating a gender binary), while others used the more general "they" or "them" (e.g., the example from Georgia Southern University above).

website stated that "medical staff must report sexual and domestic violence to law enforcement, but that does not mean a survivor has to file a report" (Medical Assistance section). The word "report" is used here to describe both medical staff contacting police and survivor filing a complaint, but the difference is not explained.

Channeling to Reporting or Beginning with Support

Websites varied not only with respect to the quality of communication about compelled disclosure, confidentiality, and the relationship between resources and reporting, but also with respect to whether, in broad strokes, they channeled survivors toward reporting or instead began with support.

The "reporting-first" approach funneled survivors toward the Title IX office and/or police. For instance, Baylor University's page on sexual and interpersonal conduct and Title IX featured four primary links: reporting, training, policies, and FAQs (Baylor University, n.d.-b). The reporting page directed survivors to the police, the Title IX coordinator, and an anonymous reporting option; only at the bottom of the page were confidential resources listed for those "not ready to report" (Baylor University, n.d.-a). Similarly, the first questions on the FAQ page were about reporting, while a question about what happens if the survivor does not want to move forward with an investigation still encouraged students to contact the Title IX office (Baylor University, n.d.-b). Only the final question on the FAQ addressed accessing a confidential resource (Baylor University, n.d.-b).

By notable contrast, the University of Nebraska at Lincoln's (UNL) website combined a narrow compelled disclosure policy with an emphasis on resources to support survivor agency. The landing page for sexual misconduct and Title IX contained four main links, with support and resources listed above reporting. Clicking through to the resources page gave contact information for relevant units, and an explanation that:

> There are certain individuals and offices on campus who you can talk to with near complete confidence. These individuals have no responsibility to act, report to law enforcement, or report to the university the information you share with them, so long as the individual is acting in their role as counselor, advocate, medical provider, or attorney at the time you share your concerns. (University of Nebraska-Lincoln, n.d.-b, Confidential Resources section)

The first resource listed was the university's Center for Advocacy, Response and Education (CARE), which moved survivors away from Title IX to a separate website informing survivors that they "will be listened to, supported and respected" and that "you will be supported in your decision to report or not to report to police, Institutional Equity and Compliance (Title IX) or neither—the choice is yours" (University of Nebraska-Lincoln, n.d.-a, para. 1). These webpages provided clear information enabling survivors to

reach a confidential resource quickly and to avoid inadvertently disclosing to someone with reporting obligations. UNL's limited compelled disclosure policy and emphasis on resources together supported survivor agency.

The University of Connecticut's website also led with support. The school's landing page for sexual misconduct provided three main links, with resources listed first (University of Connecticut, n.d.-a). A page titled "Urgent & Medical Care" led with "while there is no one right way to get help, below are some suggested steps . . .". Under a heading of "immediate steps," this webpage directed the survivor to "call someone you trust," such as "a friend, family member or victim advocate"; police were not listed. The website stated clearly that "you do not have to file a formal report, press charges, or wait for an investigation to begin before receiving assistance from UConn" (University of Connecticut, n.d.-c). A subpage on confidential advocacy not only indicated that resources are confidential, but also stated in bold face that they "do not require you to report the incident to the Office of Institutional Equity (OIE)" (University of Connecticut, n.d.-b). Although the school gave "virtually all employees" compelled disclosure duties, it had both confidential resources and "exempt employees" who "only report the information shared with them to the University if the student and/or employee requests that the information be shared (unless someone is in imminent risk of serious harm or a minor)" (University of Connecticut, n.d.-d, Disclosure section). Exempt employees could offer information about resources and reporting, although they could not implement supportive measures. Like UNL, UConn's website communicates in ways that enable survivor agency.

Discussion and Implications

This study examined how colleges and universities communicated with students about disclosures of sexual assault on their websites. Building on previous findings that schools' online information about sexual assault is often incomplete (e.g., Bedera & Nordmeyer, 2015; Bogen et al. 2019; Dunlap et al., 2018), we complicate the picture by showing that in addition to *what* was communicated, *how* schools communicated with students could support or undermine survivors' ability to act with agency (see also Schulz, 2021). Previous research has shown that schools have given all or almost all employees compelled disclosure duties (Holland et al., 2018); we add that survivors searching their school's website may struggle to understand these duties, or even learn of their existence. Like past research, we find that the vast majority of schools provide online information about confidential resources (Dunlap et al., 2018), but also show how the meaning of confidentiality is not always clear. Finally, we show how websites may channel survivors toward reporting in ways that undermine their agency.

If we conceptualize a survivor's web searches as a form of disclosure, few websites were designed with an appropriate level of clarity, sensitivity, and openness to different help-seeking strategies that support survivor agency (e.g., Freyd, 2017). This may undermine survivor ability to make informed decisions about how to respond to sexual assault, deter survivors from seeking resources, and embroil them in adjudication processes without their consent. This is a particular concern for first-year students and other groups especially vulnerable to sexual assault (e.g., BIPOC students, LGBTQ+ students, and students with disabilities), and those whose first language may not be English (Corcoran et al., 2020, p. 41S). The lack of clear online information may contribute to institutional betrayal (Smith & Freyd, 2013, 2014).

This juxtaposition between schools' imperatives and survivor needs helps make sense of why student-facing material on websites about sexual assault resources and reporting is often inadequate. Building on both literatures on federal policy implementation and survivor needs, we suggest that the legal context leads schools to focus on collating reports, which does not align with survivors' need for agency. In other words, it is difficult to communicate in a survivor-centered way about policies that are not themselves survivor-centered. Policies that place survivors at risk of unintentional reports create the need for specialized terminology (e.g., report, complaint, confidentiality, anonymity) and detailed explanations that decrease transparency.

These findings have both specific and general implications for administrators seeking to improve response to sexual assault on campus—and to reduce its frequency. First, good web communication with students about sexual assault in a context of compelled disclosure is both possible and important. Schools should be clear, accurate, and transparent, including about how their policies may limit their ability to help survivors. Websites should include information about compelled disclosure policies, including clear and comprehensive explanations of who has compelled disclosure duties, who disclosures will be reported to, what will happen once reports are made, and how the survivor will or will not be included in that process. School websites should also provide information about confidentiality, define terms clearly, and avoid confusing terms such as "confidential reporting." In describing confidential resources, it may be helpful to use language that does not assume that the survivor identifies their experience as sexual assault, and to clearly state what resources are available even if the survivor does not want to make a report. Websites that overpromise on the ability to protect confidentiality or to provide supportive measures without a report may generate institutional betrayal if survivors disclose to seek help but end up harmed by the loss of control over personal information or involvement in an investigation. Additionally, schools should consistently and clearly distinguish between disclosures and reports. All of this should be explained

in language that a first-year student in crisis would be likely to understand and should be written in gender-inclusive language. For additional guidance, administrators may refer to research on and practical guides for responding to disclosures of sexual assault for guidance (Ahrens et al., 2021; Dworkin et al., 2019; Freyd, 2017; Holland et al., 2021; Kirkner et al., 2021; Ullman, 2010), as well as the growing literature on effective online communication on campus sexual assault (e.g., Bogen et al., 2019; Corcoran et al., 2020; Dunlap et al., 2018; University of California at Berkeley, n.d.-b). In addition, administrators should seek the perspectives of key stakeholders, such as student-survivors and victim advocates, when designing communication materials. Indeed, feedback from our undergraduate coders was integral to developing the argument of this article.

Second, survivor-centered communication would be easier if school policies related to reporting were more survivor-centered. This suggests that administrators interested in advocating for the needs of survivors should work to change school policies to minimize conflicts between the interests of survivors and schools. This may be difficult when laws require "wide-net" mandatory reporting policies, or when compliance offices are the most powerful on campus. But when possible, moving toward some version of a "mandatory supporter" approach such as that outlined by Holland et al. (2021) would make design of survivor-centered websites easier. Key aspects of more survivor-centered policies include: 1) reducing the number of employees required to report, 2) separating provision of resources from reporting, including locating the provision of as many supportive measures as possible outside of the Title IX office (e.g., through a separate survivor advocacy center), 3) making confidential victim advocates highly visible (while making all options equally available), and 4) providing training for university employees in trauma-informed response, including those designing web content. Institutional courage requires going beyond blunting the effects of harmful policies to creating policies that center survivors (Freyd, 2022b).

Finally, our findings suggest the limitations of a reactive approach that focuses primarily on responding to individual incidents rather than proactive organizational change. Sociolegal research on workplace discrimination has long shown that placing the burden on harmed individuals to identify and grieve their harm: 1) is burdensome on individuals, 2) is rarely effective at resolving even individual complaints because the power relations enabling the harms are often reproduced in the complaint processes, and 3) does little to change the structural arrangements that enable and produce the harm (Ahmed, 2021; Albiston, 2010; Bumiller, 1987; Marshall, 2003). The overall low quality of these websites hints at the burden placed on individual students to bring their private harms forward in service of making the campus safer for students in the future. Honoring this burden by using knowledge

acquired through reports to "do the deep and meaningful work of transforming campus norms and culture around sexual misconduct" (Pappas, 2018, "Moving Beyond Mandatory Reporting" section) would validate survivors. Respect for survivors means asking less of individual survivors and doing more in terms of institutional change when harms surface. This is consistent with and indeed required by Title IX, which is intended to preserve access to education and prevent future harm.

This study offers guidance on key aspects of university responses that may produce institutional betrayal or demonstrate institutional courage (Freyd, 2022b; Smith & Freyd, 2014). Survivors need and deserve to have a sense of agency in the aftermath of an assault, including access to confidential spaces and validation of help-seeking strategies that do not involve formal reporting. School policies and online communications can facilitate or impede survivors' ability to make agentic choices. The experience of survivors should therefore be a central consideration in designing schools' policies and online materials.

Future research could examine the inter- and intraorganizational processes that lead to the production of school policies and websites, and how these processes vary based on school location in the sector. Organizational response to the legal environment is complex (Edelman, 2016). Analysis of how university administrators interpret compelled disclosure laws and regulations could shed light on why organizations that seek to serve student needs are not succeeding in this domain (see Cruz, 2021; Garces et al., 2021 for examples). Such studies might investigate factors such as the relative power of the various campus offices that participate in policymaking (and web design) processes, as well as the influence of external consulting firms. Researchers might compare how these processes unfold at high and low resource schools, as well as those that have and have not faced student organizing, media coverage, and/or legal scrutiny over their handling of sexual assault (e.g., Kirst & Stevens, 2015; Taylor & Cantwell, 2019; Whittier, 2018). Understanding how policies and associated web communication are developed can be leveraged to influence these processes.

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