



## ASSOCIATION OF AMERICAN UNIVERSITIES

*President*

February 3, 2015

Dear Drs. Cook, Fitzgerald, Freyd, Koss, and White:

Thank you for sending me a copy of your memorandum to university presidents and institutional review boards at universities participating in the AAU Campus Climate Survey on Sexual Assault and Sexual Misconduct. I am disturbed that you would seek to influence the behavior of independent Institutional Review Boards (IRB), but on behalf of AAU, I want to respond to a number of your assertions.

You apparently have been given access to an earlier working draft of the survey. That draft is a month old, incomplete, and very much out of date. Many of the statements in your memorandum are inaccurate representations of that early draft, and others are irrelevant in light of changes that have been made over the past month.

Before I address your memorandum, however, I want to make clear a few things. First, the AAU climate survey is a scientific initiative to help universities better understand the attitudes and experiences of their undergraduate, graduate, and professional students with respect to sexual assault and sexual misconduct. We believe that the data resulting from these surveys will help university administrators formulate policies and practices intended to make students safer. This is our first priority.

The survey instrument is being designed by an outstanding committee of experts in survey research who are committed to producing high-quality work. Westat, one of the nation's premier research and survey firms, is overseeing the design and implementation of the survey, and is responsible for the data analysis and reporting. Just as importantly, the committee includes experts in student life and other areas pertinent to this important area of study. These individuals work with students directly and are keenly aware of the information they need to improve student life.

In addition to the survey's value to participating universities and their students, we believe that the aggregate data and analysis will provide useful information to policy makers as they work on possible legislative and administrative initiatives. We are also confident that researchers such as you will benefit from the important contribution this survey will make to the body of research on this critical and complex issue.

A draft of this survey has been approved by Westat's independent federally recognized IRB to ensure that the survey complies with ethical guidelines and federal standards for human subjects research. In addition, universities are able to seek the approval of their own IRB's for the survey

and its administration. Contrary to the implication of your comments, we are confident in the expertise of these individuals, and that the survey will adhere to the highest ethical standards.

With respect to your memorandum, I would like to point out some factual errors:

- You assert that the memorandum of understanding signed by universities prohibits disclosure to virtually anybody with an interest in these matters. In fact, universities are free to consult with those inside their university who have an interest and/or expertise in these matters, such as those providing services related to campus sexual assault. Indeed, most of the committee experts have consulted extensively with their university colleagues in reviewing the draft survey instrument.
- You suggest that the survey will not employ a stratified random sample. This is not correct. A stratified random sample drawn from all students will be employed, embedded within the student census.
- You state that the “entire student body is burdened” in this survey. Our experts believe that taking an all-inclusive, census approach, on a survey of this nature is very beneficial. Universities want to make sure that as many student voices as possible are heard on this issue. In fact, many campus surveys have used a census approach, and the Department of Defense used a similar approach in recent surveys for particular subpopulations (e.g., women).
- You assert that information from some students who complete the survey will not be included in the data analysis. In fact, the Westat analysis will include information from all students, those who participate in the census as well as those in the stratified random sample. Westat will be using scientifically sound statistical techniques to combine both groups.
- You assert that the survey has the potential to underestimate the true scope of sexual assault and sexual misconduct. The truth is that the team of researchers working on the survey has employed an approach that captures a broad range of behaviors and tactics rather than limiting the survey to only a few.
- You reference the title of the survey twice, once in a way that suggests you disapprove of it. However, you have the title of the survey wrong. As noted above, the title is the Campus Climate Survey on Sexual Assault and Sexual Misconduct. Moreover, general terms like “sexual assault” and “sexual harassment” are not used in the questions about victimization; these questions specifically describe both behaviors and tactics used by perpetrators. Words like “sexual assault” and sexual misconduct are defined at the beginning of the survey and are used only for general climate questions. These questions are taken directly from scales that have been used by many other researchers, including the White House Task Force, as well as by some of you.
- You clearly imply that the survey questions focus only on behavior involving physical force. That is simply false. As to the order in which questions are asked, that order is still being determined. But to assert that the order somehow violates IRB ethical principles or even slants respondents’ interpretation of the questions is unfounded. It is certainly not the experience of those on the survey design committee who have developed these types of surveys.

Second, some of your assertions are just curious.

- The theory that an individual who participates in one survey cannot participate in another is new to me and new to the researchers with whom I have discussed this argument from your memorandum.
- The idea that students, most of whom live in a world of social media, would be overburdened by receiving several tweets and Facebook notices urging them to participate in the survey stretches credulity.
- If you are concerned that the survey ends abruptly, please give the developers an opportunity to finish the survey. The survey ending has not even been written yet.

You express concern about the timing of the survey. We intend to launch the survey in April since many students begin to depart campuses in May. Yes, AAU wants to move quickly. The problem is urgent; our universities want these data as soon as possible; policymakers and other researchers can use these data to inform their policies and procedures to enhance the safety and well-being of students. There is no reason to postpone this survey.

Our survey developers are, of course, well aware of and sensitive to the importance of ensuring that questions on this survey not only elicit accurate answers but also do not impose an inappropriate burden on students. To ensure this is the case, students have been providing feedback on these questions in a number of ways, including cognitive testing and pilot administration to groups. Questions will be adjusted as appropriate.

Finally, there is nothing “reckless” about this survey. It is a well-considered survey, informed by research and practice from the fields of sexual violence and survey methodology. It is being developed by just the kinds of experts you say should have input: experts on survey development and on sexual assault surveys, and practitioners who will use the data, with input from students as well.

I appreciate your writing to me. And I am confident that most researchers in this field, as well as practitioners working to combat campus sexual assault, will find this survey to be an important contribution.

Sincerely,

A handwritten signature in black ink that reads "Hunter R. Rawlings III". The signature is written in a cursive style with a small flourish at the end.

Hunter R. Rawlings III  
President  
Association of American Universities