

**University of Oregon Counseling and Testing Center
Title IX Response Guidelines Proposed to begin Fall 2013
Interpersonal Violence Team**

The University of Oregon Counseling and Testing Center (UCTC) supports the university's Title IX obligations by: 1) participating on multidisciplinary policy development, training and education, tracking/monitoring, and consultation teams; 2) ensuring that there is a confidential campus resource for victims/survivors of interpersonal violence to receive support and 3) ensuring that every student who contacts the UCTC is informed of resources, the reporting process, and how to access Title IX accommodations from the university; 4) contributing to University efforts to meet Title IX requirements and address campus safety concerns. This document outlines UCTC guidelines for achieving these objectives.

I. Participation on Multidisciplinary Teams

UCTC senior leadership participates on University teams, task forces and committees charged with developing and implementing university policies and procedures related to Title IX related incidents; developing and implementing training and education on available resources and reporting obligations, processes, and procedures for students, faculty, and staff; tracking and reporting aggregate data related to Title IX incidents; and assisting campus colleagues by serving as consultants regarding psychological and safety issues related to Title IX incidents.

II. Confidential Resource for Victim/Survivors:

The Office of Civil Rights (OCR) has set forth a Title IX expectation that all university employees are required to report incidents of sexual harassment/assault, including providing relevant identifying information (e.g., names of victims/survivors, names of alleged perpetrators), to the Office of the Dean of Students and/or Title IX officer. The OCR has clarified its expectations to exempt counseling and health centers from this requirement (OCR webinar, February 2013), stating specifically that the OCR:

- does not want to deter victims from seeking these [medical and mental health] services, so these individuals [medical and mental health staff] are not expected to report incidents in a way that identifies the victim without the victim's consent;
- views health centers similarly to counseling centers and that individuals who provide counseling/medical services to students who are victims of sexual violence, regardless of whether they are licensed professional counselors with confidentiality protections provided by state or local law or professional codes of ethics, are not expected to report incidents in a way that identifies the victim without the victim's consent;
- exempts staff involved in the facilitation of medical or mental health treatment (e.g., front desk/reception staff) at counseling and health centers from reporting identifying information related to Title IX incidents.

Given this information, the UCTC has developed an approach to interpersonal violence incidents that balances serving as a confidential resource for students with working closely with campus

colleagues to meet Title IX requirements and contribute to university efforts to create a safer campus conducive to meeting students' educational goals.

A. Overview of General UCTC Services Related to Interpersonal Violence and Trauma

The UCTC comprises approximately 15 senior clinical staff members, 2-4 licensed part time counselors, 4 doctoral interns, and 10 graduate student counselors that provide psychological services related to all forms of interpersonal violence. Although all clinical staff are generalists and have competence in trauma work, there are also several clinicians who specialize in this area. The UCTC provides crisis response, brief individual therapy, and group therapy to UO students and consultation to students, faculty, staff, students, and families of students.

Students who access UCTC clinical services are assigned to therapists based on therapist experience level and competency/specialty areas. We are thoughtful about counselor assignment and assign only our most experienced therapists more accessible to students who have experienced recent and more severe gender discrimination as defined by Title IX (sexual harassment, sexual assault, partner violence, bullying or stalking). When students' presenting concerns require longer-term therapy than is available at the UCTC, we may refer students to community therapists. Referrals may occur either subsequent to students receiving brief therapy/support at the UCTC or directly from the phone triage/initial assessment process. With students who have experienced interpersonal violence, the UCTC refers them specifically to community therapists with expertise in treating victims/survivors of various forms of interpersonal violence and trauma clients. Before referring those students to community therapists for longer-term therapy, the UCTC first provides information regarding Title IX resources and potential accommodations to these students. The UCTC also runs a Dialectical Behavioral Therapy group that is particularly effective for trauma survivors who are having difficulty with affect regulation. Students may participate in this group, even if they are in treatment with a community therapist.

Students who seek out psychological support from the UCTC may report incidents of interpersonal violence via their intake paperwork, as part of the telephone triage process, or during a therapy session without activating the required Title IX reporting process.

B. UCTC Clinical Staff Title IX Responsibilities:

Counselors and psychologists discuss options and resources with all students who report gender discrimination including sexual assault/harassment/interpersonal violence/ bullying and stalking. These options will include reporting options and procedures, as well as medical, legal, and academic resources.

- If clients indicate that they want to make a formal Title IX report and/or receive services/support from another UO department (and has been informed of the reporting obligations of the other party), clinicians will facilitate the referral to the appropriate department. If the referral includes the UCTC disclosing information that could reveal the client's identity, clinicians will obtain a release of information

authorizing the UCTC to disclose or exchange information with relevant parties. This information will be documented in the clients' confidential clinical files and the releases will also be scanned into the clients' file.

- If clients do not want to make a Title IX report or receive services/support from another UO department, the clinician will inform them of their right to make a report in the future. The clinician will also document, in the clients' file, clients' explicitly expressed wishes not to seek services from or make a report to other university department at that time.
- If clients want the UCTC to make a report, but not identify them by name, clients will be asked to sign a release of information form that authorizes the UCTC to inform the Title IX coordinator about the gender discrimination/interpersonal violence experienced as a student at the UO, without providing identifying information about the client. This information will be documented in the client's file and the release will be scanned into the client's file.
- If the client wants the UCTC to make a report, and identify the client by name, the client will sign a release of information that authorizes the UCTC to inform the Title IX officer about the incident of interpersonal violence and to identify the client's name. The client will be informed that they will likely be contacted by the Office of the Dean of Students or the Title IX officer and that they can choose whether they want to meet with those individuals when they are contacted. This information will be documented in the client's file and the release will be scanned into the client's file.
- Counseling and health centers may report general de-identified and aggregate information to the Title IX officer (e.g., I received five reports about sexual assaults in "x" residence). The UCTC Interpersonal Violence Response Coordinator will share this aggregate information with the Title IX officer on a monthly basis.
- When clinicians cover informed consent and limits to confidentiality with students during initial assessments and first sessions, they include the following information.
In order to comply with federal laws regarding sexual assault/harassment on college campuses, there are instances in which we are required to notify the Director of Affirmative Action that a sexual assault/harassment has occurred but we would not release your name or any information that specifically identifies you without your permission.
- Clinical staff and trainees are expected to notify their supervisors when a student reports a campus related sexual assault. Supervisors will be expected to inform the Associate Director/IPV Response Team Coordinator.

III. Interpersonal Violence Response Team

- A. The UCTC Interpersonal Violence Response Team comprises at least five senior clinical staff members and at least one doctoral intern, all of whom have more extensive training

or experience with trauma treatment. University Health Center staff members that are charged with facilitating the interpersonal violence response procedures may at some point also participate on the team. The UCTC Associate Director leads the team and is identified as the UCTC Interpersonal Violence Response Coordinator. These IPV team clinicians will be the first contact for students who come to the UCTC reporting Title IX related incidents. This team will have more advanced knowledge and expertise regarding campus and community resources; the University's Title IX obligations, including the roles the Title IX Coordinator, Dean of Students, faculty and staff, and student employees in responding to interpersonal violence; clinical support for victims/survivors of interpersonal violence; and the UCTC's procedures and practices for addressing interpersonal violence.

- When the UCTC is alerted to a UO student having experienced interpersonal violence/gender discrimination during the time they are a student or while participating in a university related organization or activity, UCTC front desk staff will be instructed to schedule the student with an IPV response team clinician, if that student accesses UCTC services.
- If a student presents in crisis or walked over by a UO staff/faculty member, UCTC front desk staff will pull an IPV response team clinician out of another meeting if needed to meet with the student.
- If the UCTC does not become aware that the client experienced interpersonal violence/gender discrimination until after the client is assigned to a UCTC therapist, and the therapist is not an IPV response team clinician, the therapist will have one of the team clinicians attend a therapy session to provide Title IX information (resources, reporting process, and how to access accommodations).
- The IPV response team clinician may also facilitate reporting and provide case management for the student, if the student chooses to report. This facilitation could include scheduling a meeting with the Associate Dean of Students or Sexual Assault Response Coordinator in Dean of Students Office and subsequent to obtaining a release of information, disclosing specific and identifying information to the Associate Dean of Students. Another example could include calling the Health Center with student in session to schedule an immediate appointment with a SANE (Sexual Assault Nurse Examiner).
- IPV response team clinicians will provide written information on campus and community interpersonal violence resources to the client.
- IPV team clinicians will meet regularly as a group to discuss specific Title IX situations in order to more effectively provide seamless services for students, and to ensure consistent and updated information is provided to clients.

B. UCTC IPV Response Coordinator/Team Leader: Brooks Morse, Associate Director and designated IPV Response Coordinator, will serve as the liaison between the UCTC and other campus and community stakeholders regarding Title IX. This will include the following.

- Monitor and track the Title IX incidents of UCTC clients so that aggregate, de-identified information can be disclosed to the Title IX officer, and to track potential patterns that might reveal a significant campus safety risk.
- Every UCTC clinician is expected to provide the following information to the IPV coordinator within 1-2 days of student contact: client clinical file number, type of interpersonal violence/gender discrimination, whether perpetrator was a student or faculty/staff member, whether incident occurred on campus or off and specific area of community (e.g., specific bar or living environment), whether the incident involved alcohol or weapons.
- The IPV Coordinator reviews the client file and/or meets with the UCTC therapist if more information is needed, particularly if a pattern is emerging such as several occurring in the same living environment, social environment, or appears to involved the same perpetrator.
- The IPV Coordinator attends monthly meetings with Title IX officer, Associate Dean of Students, Dean of Students Sexual Violence Response Coordinator, and UOPD Clery Coordinator. The UCTC IPV Coordinator discloses aggregate, de-identified information summarized from the previous month including, number of Title IX reports to the UCTC, types of IPV/gender discrimination, general location (e.g., on/off campus, residence hall, bar, academic building, off-campus apartment), and number of alleged student or staff/faculty perpetrators.
- If a pattern emerges from UCTC obtained Title IX information that reveals the safety of the campus community is significantly at risk, the IPV Coordinator will consult with the UCTC Director. Subsequent to this consultation, the IPV Coordinator may disclose to the Title IX officer and the Associate Dean of Students de-identified, yet more specific information such as naming a living group or local bar in which multiple interpersonal violence incidents have occurred. Additionally, the IPV Coordinator or Director may initiate a second discussion with the client(s) who made the report to determine whether the student would be willing to authorize the UCTC to disclose identifying information. The decision to initiate this discussion will be based on the potential risks/harm to the client and/or the client's therapeutic relationship with the UCTC.
- In very rare cases, if the IPV Coordinator becomes substantially concerned about the risk to campus safety, she will consult with the Director of the UCTC, who will make the decision whether campus safety takes precedence over client confidentiality. If the decision is affirmative, only the Director will share this information with the Title IX officer. First, efforts will be made to discuss these concerns with the client and to obtain consent from the client to disclose more information to the Title IX officer.

- The IPV Coordinator will attend monthly UO ASAP (Alliance of Sexual Assault Prevention) committee meetings to ensure effective communication with campus colleagues providing prevention and response services to UO students, as well as to identify prevention efforts in which the UCTC should participate.
- The IPV Coordinator provides consultation to UCTC staff regarding mandated Title IX reporting as employees, when they are not providing confidential therapy and consultation services to students, and regarding IPV Response Team procedures and practices.