

October 22, 2015

Ruth Greenblatt, MD  
UCSF Academic Senate  
500 Parnassus Avenue  
San Francisco, CA 94143

Re: The University of California's Presidential Policy on Sexual Violence and Sexual Harassment

Dear Chair Greenblatt:

The UCSF Academic Senate Committee on Equal Opportunity (EQOP) reviewed the revised final draft of the University of California's Presidential Policy on Sexual Violence and Sexual Harassment. EQOP appreciates this opportunity to review the policy and respectfully submits the following comments.

**General Comments**

- EQOP applauds the inclusion of the policy in Spanish and Chinese languages and recommends that campuses be given the resources in order to offer the policy in additional languages to meet the needs of their constituents.
- There is a concern that mandatory reporting will not necessarily improve compliance as this is more of an issue of University culture. That being said, it seems appropriate to include mandatory reporting for faculty as they are in supervisory positions. Faculty in health professions and K-12 education are already familiar with the concept of mandatory reporting for other issues such as suspected child and elder abuse; however, some stakeholders feel strongly that mandatory reporting is not a good idea in the sexual assault arena. It would be useful to review current evidence regarding the impact of mandatory reporting and have experts on this issue provide guidance. We also recommend regular evaluations on implementation and impact of the policy.

**Mandatory Reporting** [Section II (C)(6)]

EQOP recommends that there not be different requirements depending on type of student, namely undergraduate and graduate. There is a power differential in all cases, and the concern is that when requirements differ, the likelihood of taking appropriate action decreases. Current UCSF language posted publicly is as follows: "You should feel free to talk to a trusted friend or colleague. Keep in mind that managers, supervisors and certain employees such as faculty and principal investigators are required to report to the Title IX officer (sexual harassment officer)." This [site](#) also provides an avenue for anonymous reporting.

**Relationship Violence** [Section II (B)(1)(b)]

Dating violence is often more than just about bodily injury. Consider including these terms "physical, sexual or psychological harm including substantial emotional distress."

**Sexual Harassment** [Section II (B)(2)(a)]

Would repeatedly asking someone for a date be automatically considered "of a sexual nature," or would this fall under general harassment? This section does not address advances that may not be overtly sexual, yet could still fall under the term "sexual harassment."

**Note on Sex Discrimination** [Section II (C)(1)]

The placement of this item is incongruous. It should be a numbered item on the list of prohibited conduct.

**Other Definitions** [Section II (C)]

The list of definitions (including Confidential Resources, Complainant, Location, Preponderance Evidence, Respondent, and Responsible Employee) should be made available at the beginning of Section II, since these terms are mentioned in Section II (A) and Section II (B).

**Language Translation** [Page 1]

Correction is needed for the Chinese translation of "Chinese Version, Please click here." 中國版本 should be replaced by 中文版本.

Thank you again for the opportunity to opine.

Sincerely,

A handwritten signature in blue ink, appearing to read "Janice Tsoh".

**Janice Tsoh, PhD**

Chair, UCSF Academic Senate Committee on Equal Opportunity