June 11, 2021

Submitted via T9PublicHearing@ed.gov

Written comment prepared by Dr. Antonia O. Franco, Callisto CEO (antonia@projectcallisto.org)

RE: Office of Civil Rights hearing pursuant to Title IX of the Education Amendments of 1972.

Callisto appreciates the opportunity to submit a written comment for the 2021 Title IX Public Hearing. Callisto stands in support of the comprehensive policy recommendations presented by Know your IX, EROC, It's on US and Every Voice Coalition. Their recommendations are guided by survivor perspectives and they speak to the necessity for the Title IX Policy to hold the K-20 education system accountable and provide guidance on how to place the survivors’ needs at the center. We stand in solidarity with the aforementioned groups on calling upon the Department of Education to:

1) Restore Long-Standing Protections for Student Survivors
2) Protect survivors against retaliation
3) Ensure Fair Discipline Processes for All Students
4) Increase Protection and Enforcement of K-12 Students’ Rights
5) Expand Access to Supportive Measures and Accommodations
6) Implement Solutions to Curb the Financial Impact of Sexual Violence
7) Increase Protections for Survivors of Intimate Partner Violence and Stalking
8) Provide Transparency to Students at Institutions Claiming Exemption(s) from Title IX
9) Prohibit Conflicts of Interest for Title IX Coordinators and Staff
10) Increase Prevention Efforts
11) Limit Police Involvement in Campus Cases
12) Ensure Title IX Protections for Queer and Trans Students

Callisto is a non-profit organization, who envisions a world where sexual assault is rare and survivors are supported and is driven by a mission to combat sexual assault, support survivors, and advance justice through technology. We believe that survivors should be recognized as autonomous agents over their actions and given a world of options to choose from. To that end, we have learned that survivors are seeking options outside traditionally recognized avenues and thus, we have responded to this need with the use of technology.

Callisto has designed a serial assault detection and protection system to identify repeat offenders. Callisto’s online, trauma-informed system offers survivors the ability to create an encrypted record, store their offender’s identity and information in escrow so if another
survivor names the same assailant and a match occurs, the survivor will have the ability to speak with a Legal Options Counselor to review their choices and decide what justice might mean to them.

Our system was designed to address the reality that 90% of campus sexual assaults are perpetrated by repeat offenders who commit an average of six assaults. Though evidence demonstrates the pervasiveness of campus sexual assault, it remains largely unseen and unstopped.

Less than 10% of survivors report their assault due to barriers such as limited knowledge about their options and fear of retaliation or stigma. This impacts the lives of more than 26% of women, 6% of men and 23% of TGQN (transgender, genderqueer, nonconforming) students, who will experience a sexual assault or rape during their college career and very likely to not report as indicated above.

USA Today News published an article on May 26, 2021 titled “Six Women reported a Louisiana College Student for Sexual Misconduct. No one connected the dots.” that illustrates the need to improve the Title IX Policy to allow universities to detect offenders within their community earlier to curtail additional harm to students. Callisto is designed to address this very issue to ensure a community is protected from further harm and our work is built around a central thesis: If we can empower survivors of sexual misconduct to take coordinated and informed action to protect their communities, we can prevent the majority of sexual violence in the United States from happening in the first place. For example, If we were able to stop repeat offenders after their second assault, we could prevent 59% of sexual assaults.

Every day at Callisto we strive to empower and support survivors. Each of their stories are unique, and a common thread across all of their stories is their desire to prevent their assailant from perpetrating again. We are an organization created by survivors, for survivors, and the only U.S. based nonprofit providing a service working to exponentially reduce the number of sexual assaults on college campuses. The hallmark of our work is advocacy and empowerment of college-aged survivors.

It is important to acknowledge that Callisto exists
within an ecosystem of support made up of passionate student organizations, community groups, and allies who stand ready to continue the fight for survivor agency, healing and justice. We are proud to join the many voices calling upon the Department of Education and the Biden Administration to overturn the harmful policies and regulations of Title IX.

Contact: Dr. Antonia O. Franco, Callisto CEO (antonia@projectcallisto.org)

Sarayfah Bolling
Assistant Director of Campus Engagement, Callisto
sarayfah@projectcallisto.org
Atlanta, Georgia
she/her/hers
https://calendly.com/sarayfah