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Sent: Mon, 7 Jun 2021 20:42:11 +0000
To: T9PublicHearing
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Subject: "Written Comment: Title IX Public Hearing"

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For many years as a retired law enforcement professional and as a school safety consultant, I worked with schools toward improving school responses to sexual assault allegations, gave advice on how to investigate those allegations and more importantly, how to identify victims and potential perpetrators of sexual assault against children. I was regularly surprised at the naivete of education administrators when identifying the "grooming" process utilized by education employees and others when preparing children for an illegal sexual encounter. Further, most schools ignore completely any training, policy, procedures or directives supporting the reporting, recording, investigation and overall handling of sexual assault complaints, not only of student on student events but teacher on student attacks. The State of Oklahoma has an embarrassing record on allowing employees suspected of sexually abusing children to continue to maintain employment in the education profession, of "passing the trash" from one district to another and for failing miserably in taking seriously the complaints of victims against their abuser.

It was therefore not surprising but extremely disappointing to me as both a law enforcement officer, school safety advocate and parent to find former Secretary of Education Betsy DeVos reducing the reach of Title IX and making comments that clearly suggested she was out of touch with what was and still is going on every day in schools across this nation. Her approach demonstrated a total lack of understanding for the depth, breadth and seriousness of the overall problem. It is huge and continues to be so.

Enhancing, not diminishing, Title IX, should include but not be limited to:

- Mandatory revocation of any education or teaching certificate where proven allegations of sexual abuse of children occurs, even when criminal charges are not approved.
- Revocation of administrative certificates for any administrator failing in their obligation to report to law enforcement allegations of sexual abuse of children.
- Encouraging and offering support to school districts in law suits against other districts who fail to disclose allegations of sexual abuse of children.
- Mandating policies for handling allegations of sexual abuse, sexual bullying, bullying of LGBTQ students, intimidation of victims, and policies on annual training that includes identification of behavior(s) deemed to be consistent with the grooming methods utilized by sexual predators who prey on children.
- Written guidelines and enforced discipline against students who intimidate, bully, harass or otherwise infringe on the rights of LGBTQ students, and students who are victims of sexual assault by other students or education professionals. Mitigation techniques and mediation of these attacks by forcing an agreement or apology between the abuser and the victim are not approved methods of address. Such a response should be made unavailable.

- Title IX training should be made mandatory at all levels of the education process, including K-12

I am available to discuss my email, the trainings I offered for years and the impact such training has had within education. I hope the individuals responsible for enhancing protections for students, faculty and staff are as committed to the safety of these individuals as they are hoped to be by the children and parents who place their trust in them.

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