

From: Joel Levin
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Title IX Public Hearing comments

June 10, 2021

Hello, my name is Joel Levin. I am the co-founder and director of programs for Stop Sexual Assault in Schools (SSAIS). SSAIS was founded in 2015 and is the first national nonprofit specifically created to address widespread K-12 sexual harassment and assault. I'm also a parent of a student survivor who was sexually assaulted in a school program.

SSAIS hears regularly from families whose elementary or secondary schools have failed to respond promptly and effectively to reported sexual harassment. They feel bewildered and betrayed by the institution responsible for their students' safety, well-being, and academic growth.

Just in the last year hundreds of students nationwide have spontaneously formed Instagram groups to express anger and frustration at their schools' ineffectual response to sexual harassment complaints. They resort to social media groups out of frustration due to their schools' inaction to reported sexual harassment.

SSAIS criticized the 2020 Title IX Rule for reversing two decades of Department guidance upon which state education departments and school districts have shaped their sexual misconduct policies. Schools are now compelled to navigate two tiers of sexual misconduct—Title IX and non-Title IX—with conflicting definitions, grievance procedures, and accommodations. It's no surprise that students voice dissatisfaction when confused administrators offer inadequate and ineffectual responses.

It falls to the district Title IX Coordinator to respond to all complaints involving possible sex discrimination, including sexual harassment, so it is critical that the Coordinator has the

necessary time, qualifications, training, and independent authority. The Department itself has found that the most egregious and harmful Title IX violations occur when a Title IX Coordinator lacks adequate training or credentials. In too many school districts this crucial role is delegated to a secretary, coach, or office worker who then wrongly defers their responsibilities to district counsel.

We strongly urge the Department to overhaul its 2020 Title IX rule and restore and amplify its guidance beginning from 2001, especially the 2015 guidance on Title IX Coordinators. The Department should set minimum qualification standards for K-12 Title IX Coordinators and dedicate adequate resources for training and technical assistance. State education agencies should certify that all district Title IX Coordinators have the most current knowledge of Federal and State laws, regulations, and policies relating to Title IX and gender equity, and ensure that all employees whose responsibilities may relate to Title IX have appropriate training. The Department must step up its efforts in ensuring that Title IX Coordinators are qualified, proactive leaders working to end sexual harassment in their schools.

Thank you.

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Joel Levin, Ph.D
Director of Programs, Co-Founder
joel@stopsexualassaultinschools.org

[Stop Sexual Assault in Schools](#)
Educating about sex discrimination and the right to an equal education free from sexual harassment. SSAIS is a 501 (c) (3) non-profit.
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