

**DISTRICT RESPONSE TO  
MAY 29, 2015, TITLE IX COORDINATOR INTERIM REPORT**

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January 14, 2016**

The Interim Title IX Coordinator identified seven areas where initial steps were taken to develop processes for responding to student on student sexual assault claims and made the recommendations for next steps. This report reiterates those next step recommendations and provides the district's response.

**I. Initial Response to Allegations and Interim Measures**

1. **Intake:** The District should develop documents that give principals guidance on the initial steps to take when allegations of sexual assault are first brought to his or her attention. **Response: In Progress** - they will be part of an administrative procedures manual and covered in training
2. **Student Respondent Support:** Alleged aggressors and their families should receive standardized information about the investigation process and Title IX. Particular attention should be given to developing materials for elementary and special education students. **Response: In Progress** - The administrative procedures, participants' rights, and resources are under review. The FLASH Special Education curriculum can be better utilized and additional resources about typical child development and sexual behavior problems will be added to internal resources.
3. **Sexualized Cyberbullying:** The District should develop guidelines on how to address cases involving "sexting", sharing of explicit images and social media. **Response: Completed** - The district already has "sexting" guidance in the MySPS/internal Discipline website, but it will be added to Title IX administrative procedures manual.
4. **Safety Plans and No Contact Contracts:** The District should develop: (a) standardized templates or guidelines for cases involving allegations of sexual harassment and sexual assault, including templates that are adjusted for age and (b) guidelines on how to assess the quality of safety plans, and when to end plans and under what circumstances. **Response: In Progress** – Administrative procedures manual, including guidelines, templates, and resources will be completed by September 2016.

**II. Revising the District's Sexual Harassment Procedure**

The district began review of Superintendent Procedure on Sexual Harassment, 3208SP, and it was recommended that: (1) 3208SP be revised and (2) the district should create a separate Title IX practice manual with additional guidance. **Response: (1) Completed** Revisions were made to 3208SP based on feedback from the Task Force, the General

Counsel's office, and the SCRO. The revised 3208SP was approved by the Superintendent on December 17, 2015. **In Progress (2)** – In consultation with others, by September 2016, the SCRO and the Title IX Coordinator will develop an administrative procedures manual.

### III. Training Employees on the Investigation and Complaint Process

1. The District should create a plan to develop, roll out and track all of the required Title IX trainings, including trainings for all students, volunteers, and employees. A sub-set of this work is developing a plan to integrate Title IX training into existing trainings, like trainings for new employees and principals. **Response: Accepted and in Progress** - Principals received training in Spring 2015 and all staff were notified on December 17, 2015, of revisions to 3208SP. We are looking at future training opportunities for Principals in April and training for other staff, including online trainings and live professional development training opportunities over the next year.
2. The District should continue to develop the employee trainings listed above, or others like them, and require that at least one Title IX employee training be conducted annually. **Response: In Progress.** All new staff and volunteers are required to take Adult Sexual Misconduct Training. The district's harassment policy and procedure, 3207 and 3207SP, also requires annual training, and we are working on institutionalizing training on harassment issues, including sexual harassment.

### IV. Recordkeeping, Reports and Case Analysis

1. Establish a work group to develop an agreed upon process for record keeping and for generating periodic reports, including (a) the annual report required by the 3208 procedure and (b) mid-year reports for key stakeholders. **Response: In progress (a)** The revised 3208SP specifies what the annual report should entail for 2015-2016. With respect to 2014-2015 report, SCRO and Assistant Superintendent of Human Resources are working on determining when it can be completed. **Not accepted (b)** there is no mid-year report required for key stakeholders and such reporting diverts resources from development of guidance, procedures, resources, and training.
2. The Title IX Coordinator should have access to PowerSchools. **Response: Completed.**
3. Continue to monitor the patterns evidence by this preliminary data. **Response: In Progress.**

### V. Investigations and Investigators

1. The District should adopt guidelines for both formal and informal investigations and reports. **Response: Agreed.** See below.
2. The District should develop forms, checklists or guidelines to help people conducting

investigations comply with District and legal standards. Response: **Agreed.**

3. The District should hire internal investigators who have sexual assault investigation training. **Response: Completed and in-progress for HIB and Discrimination Investigator.** Other hires will be contingent on budget and resources.
4. The District should clarify roles and responsibilities in this area. **Response: Agreed. Response: In Progress (2)** –In consultation with the Deputy Superintendent, the General Counsel’s office, and stakeholders, the SCRO and the Title IX Coordinator will develop an administrative procedures and practice manual, which will include samples and templates.

#### **VI. Developing Guidelines and Procedures for Conveying Final Results**

1. The District should strive to reduce the amount of time it takes to get the response letters returned to parties. **Response: Agreed.** This is mandatory to ensure compliance with federal and state laws, and district policy.
2. The District should strive to maintain better and more consistent communication with families about investigations before the final response letter is issued. **Response: Partially accepted.** There are competing concerns about integrity of investigations, confidentiality, and the amount of information that can be shared due to FERPA and other laws. However, it is **agreed** that parents should be timely informed about the steps taken to ensure safety for victims and due process rights for persons against whom allegations have been made.
3. The District should encourage the practice of first conveying final results in person, then giving the parties the letter. **Response: Agreed.**

#### **VII. Posting Required Notices**

The District should create alternative versions of these notices for English Language Learners, people with disabilities, and various age groups (such as elementary, middle school, and high school students). See also the Task Force’s Interim Report, Section III, for recommendations for improving the visual appeal of the required notice and for creating additional notices.

**Response: Completed.** For info on translated information, see, Section D of Task Force Response and [http://www.seattleschools.org/district/title\\_ix/resources/](http://www.seattleschools.org/district/title_ix/resources/)  
**In progress.** The SCRO met on December 18, 2015, with a career and technical education (CTE) high school class that, as a graphic design assignment, created new fliers to improve the visual appeal. The SCRO is working with the instructor in that program to get appropriate permissions and PDFs to use some of the new designs.