



Men Stopping Violence

Working together for a change.

September 20, 2017

Dear Assistant General Counsel Hilary Malawer,

Men Stopping Violence (MSV) organizes men to end male violence against women and girls through innovative trainings, programs, and advocacy. Since we opened our doors 35 years ago, we have educated over 60,000 men about how to change abusive behavior. In addition, we have provided consultation, keynotes, and training to 2,500 government agencies, businesses, universities, and domestic violence agencies.

We urge the Department of Education to put students first by maintaining all guidance on Title II, Title VI, and Title IX in its current form and preserving 34 C.F.R. pts. 1 through 1299. Based on our experience, we believe:

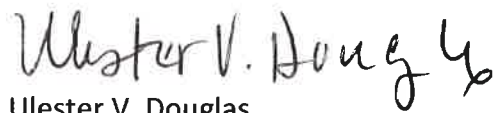
1. Rescinding or revising any current guidance and regulations is not in the best interests of survivors: Survivors of sexual assault and advocacy organizations have consistently and eloquently articulated the negative impact rescinding current guidance would have on victims of sexual assault, most of whom are women. We strongly urge the Department of Education to believe the testimony of sexual assault survivors and their advocates that undermining Title IX enforcement and the 2011 Dear Colleague Letter will undermine student safety and the ability of all students to pursue an education free from gender-based discrimination
2. In addition, rescinding or revising any current guidance and regulations is not in the best interests of men who violate women: One thing we have learned about men is that swift and clear responses to male sexual violence really matter for the process men must undergo to change. Current guidance requires accountability for individuals and for institutions. Rescinding the current guidance will embolden men who violate women on campus and make it easier to get away with sexual assault by creating more confusion, delay and inaction at the campus level. In the long term, it is in men's interests to experience accountability for their actions because then they can make choices that don't violate women. Thus, accountability is in women's interests, but it is also in men's interests if they want to have meaningful and respectful relationships with women.

Last, we believe in a fair process. No one benefits when people are treated unfairly. However, there is a misconception about the protections the Dear Colleague Letter, Title IX and the Clery Act afford respondents. Since 1975, 34 CFR 106.8 (b) has required schools to provide prompt and equitable resolutions to complaints, a mandate that the Dear Colleague Letter emphasizes

repeatedly. Thus, all parties must have equal procedural protections, and, as the Dear Colleague Letter explains, schools may never favor one side over another. Rather than rescind or revise current guidance, however, the Department of Education should focus on further clarification and enforcement to build on what the Dear Colleague Letter accomplished.

Every student deserves equal protection under the law to have an education free from discrimination, whether on the basis of sex, race, color, national origin, disability status, English proficiency, sexual orientation, or gender identity. Strong enforcement of Title II, VI and IX from the Department of Education is increasingly necessary. Please protect the civil rights of students by maintaining all existing guidance and regulations.

Sincerely,

A handwritten signature in black ink that reads "Ulester V. Douglas". The signature is written in a cursive, slightly stylized font.

Ulester V. Douglas
Executive Director

A handwritten signature in blue ink that reads "Greg Loughlin". The signature is written in a cursive, slightly stylized font.

Greg Loughlin
Assistant Director