

# YWCA IS ON A MISSION

September 20, 2017

The Honorable Betsy DeVos  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

RE: Docket ID: ED-2017-OS-0074

Dear Secretary DeVos,

As one of the oldest and largest women's organizations in the nation, YWCA USA is dedicated to eliminating racism, empowering women and promoting peace, justice, freedom and dignity for all. Today, our 216 local associations in 47 states and the District of Columbia combine programming and advocacy to generate institutional change in the areas of racial justice and civil rights, empowerment and economic advancement of women and girls, and health and safety of women and girls.

In light of our mission and history, YWCA USA writes today in response to the June 22, 2017, Federal Register request for input on regulations that may be appropriate for repeal, to urge the U.S. Department of Education to maintain regulations and guidance that we believe are central to meeting its responsibility for protecting students from discrimination on the basis of race, color, national origin, sex, and disability.

Despite progress in many areas of life, too many of our young people continue to experience barriers to educational success. The Department's rules, regulations, policy guidance, data collection efforts, compliance reviews, and enforcement activities remain critical tools for ensuring that all students receive equal access to educational opportunity in safe and supportive learning environments. This is especially true for students who historically have been marginalized, including students who are African American, Latino, Asian American or Pacific Islander, Native American, immigrant, girls, LGBTQ, English learners, religious minorities, or who have a disability.

YWCA is particularly concerned about the marginalization that girls of color historically have experienced, and that they continue to experience in America's schools. As described more fully in our policy brief, [On a Mission for Girls of Color: Inequality at School](#), many girls of color experience overly punitive disciplinary responses in public schools that are frequently under-funded, under-resourced, and increasingly segregated by race, ethnicity, and economic status. Such learning environments and the resulting academic achievement gaps that girls of color experience are illustrative of the ways in which they experience significant institutional and structural racism in

eliminating racism  
empowering women  
**ywca**

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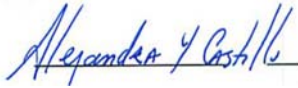
America's education system.

To address these and other concerns, YWCA urges the Department to maintain in full force and effect all regulations and guidance documents that seek to protect students from discrimination on the basis of race color, national origin, sex, and disability, as well as those that seek to improve the academic achievement of disadvantaged students. We are particularly concerned about the negative impact that repeal of the 2016 "Dear Colleague Letter on Transgender Students" and the 2011 "Dear Colleague Letter on Title IX Requirements and How They Relate to Sexual Harassment and Sexual Violence" would have on students, and urge the Department to maintain these important guidance documents.

At a time of such rapidly shifting demographic changes, the Department should be affirming rather than paring back the tools and resources that have been developed to protect students from discrimination. Moreover, instead of repealing, replacing, or modifying regulations and guidance documents, the Department should further its commitment to racial and gender equity by bolstering support for the local level school system personnel who bear such important front-line implementation responsibilities.

YWCA appreciates the opportunity to share our views with you. If you have any questions, please contact YWCA USA Vice President of Public Policy and Advocacy Catherine Beane, at [cbeane@ywca.org](mailto:cbeane@ywca.org) or 202-835-2354.

Sincerely,

A handwritten signature in blue ink that reads "Alejandra Y. Castillo". The signature is written in a cursive style and is positioned above a horizontal line.

Alejandra Y. Castillo, CEO YWCA USA