

To: Assistant General Counsel Hilary Malawer

Regulatory Services Division, Department of Education

From: Loribeth Weinstein, CEO

Jewish Women International

Date: September 20, 2017

Re: Department of Education Proposed Rule: Evaluation of Existing Regulations

Jewish Women International (JWI), a leading national organization working on DV/SA, urges 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., numbers 1 thru 1299.

JWI, a leading advocate for campus sexual assault and dating violence prevention, condemns any rollback of protections for survivors of violence on college campuses. Incidents of sexual assault on college campuses are alarmingly frequent – one in five women and one in sixteen men will be sexually assaulted in college, and over ninety percent of these students will not report the assault. (National Sexual Violence Resource Center – Statistics about Sexual Violence, 2015)

It is imperative the Department of Education provides protections to survivors under Title IX of the Education Amendments Act of 1972. Instead of stripping away Title IX implementation regulations, we urge the Department to work to support survivors of violence and provide additional resources to schools and colleges to combat the culture of violence.

Title IX requires schools that receive federal funding to provide equal access to educational programs and activities. Sexual assault, dating violence, and stalking create hostile educational environments that impede survivors ability to achieve their full potential in both educational and extracurricular settings. Removing the regulatory guidance runs counter to the intention of the law and will lead to a greater risk for survivors. Additionally, removal of the Title IX implementation guidance denies both survivors and accused perpetrators the rigorous adjudication process students deserve.

JWI provides critically important proactive, prevention programming on college campuses, teaching students about sexual assault, dating abuse, and bystander intervention. Through our multi-faceted holistic program, *Change the Culture*, we hear from scores of students who want more prevention education. A revocation of Title IX guidance will make it challenging to provide this information to students and create the cultural changes needed on campuses.

Every student deserves equal protection under the law. Strong enforcement of Title II, VI and IX from the Department of Education is essential. JWI calls on the Department of Education to protect the civil rights of students and maintain all existing guidance and regulations.