

**DISTRICT RESPONSE TO
PREVENTION OF SEXUAL HARASSMENT AND SEXUAL ASSAULT TASK FORCE'S
FINAL RECOMMENDATION REPORT¹**

**Prepared by Kelli Schmidt, Student Civil Rights Officer (SCRO)
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A. Student Assessment / Climate Survey Request for Specific Types of Questions

A.1 Develop and include a set of questions for students regarding sexual harassment and sexual assault in District annual student climate survey during the 2015-16 school year.

Response: Accepted and in Progress - SPS Research, Evaluation, and Assessment (REA) Department will coordinate a process to review and approve new survey items to be added to the District's annual student climate surveys.

A.2 Provide a corresponding set of questions regarding sexual harassment and sexual assault to middle and high school and include them in any school specific surveys.

Response: Alternative to Recommendation - The District does not have an infrastructure in place to do this. However, the REA Department will explore the possibility of creating a more detailed follow-up Title IX survey that could be given to schools identified as negative outliers based on District's student climate survey results.

TF Response: Conduct follow-up during the 2015-2016 school year.

Response: Exploring - The follow-up will occur in a timely fashion after review and assessment of the 2015-2016 climate survey data, but may be in the 2016-2017 school year.

A.3 Create new strategies for administering climate surveys to encourage greater participation, such as online completion, incentives for completion, and time for in-class completion. SHSA suggests contacting student government officers, school leadership teams, etc., from specific schools to ensure the options explored are youth-informed. Set participation goals to improve students' response.

Response: Accepted and Exploring - We will ask school principals via Principal Communicator to develop a plan for student engagement with the School Climate Survey. District will explore options for a survey format and environment that ensures students feel as safe and comfortable as possible when taking a detailed follow-up survey on this topic.

B. Staff Assessment

B.1, B.2 and B.3 The SHSA Task Force created the key informant survey regarding issues of sexual harassment and sexual assault and SPS distributed the survey widely to health

¹ The Final Recommendation Report can be found online here:
http://www.seattleschools.org/UserFiles/Servers/Server_543/File/District/Departments/title_ix/Final_Report_of_Task_Force_submitted_December_9_2015.pdf

teachers, counselors, principals/vice principals, and appropriate support staff in April 2015. Responses were received from 230 staff members and teachers. Analyze the data collected from the key informant survey to inform recommendations. Make the results of these surveys publicly available through the Title IX web page on SPS website in languages other than English. Revise and re-administer the survey to gather follow-up information for at least the next 2-3 years while infrastructure and training are being implemented.

Response: Accepted and in Progress - The SCRO and Title IX Coordinator will review and analyze the prior results and the training provided and other information provided to staff during past year. We will then use that information to inform training and support, determine what follow-up questions are needed, and administer a new survey in the fall of 2016-2017. The SCRO will see explore having the survey or a summary of the results translated into languages other than English.

C. Create Awareness of Students' Title IX Rights and Identification of Harassment

C.1. Develop proactive public campaign led by the Superintendent explaining the District's emphasis on Title IX compliance and highlighting how SPS is building a District-wide climate of prevention of incidents and supportive responses to incidents of sexual harassment and sexual assault. Suggest targeting students, families/caregivers, staff, and wider- community through press release, school websites, and newsletters, staff email, coordinating support from ASBs, PTAs, etc. where possible.

Response: Accepted and in Progress - SCRO is working with Communications Department on communications plan and has already met with head of PTSA and sent out announcement about revised sexual harassment procedure via Principal Communicator. Such channels will continue to be used for conveying information.

C.2 Distribute age appropriate printed materials to families/caregivers and students. Materials have been selected and translations are in progress. Plans for distribution printed copies in appropriate offices, posted on building walls/bulletin boards, and available on schools and SPS websites. Provide advance notice to school principals along with supports. Recommend sending materials via U.S. mail to K-8 and to review with students in grades 9-12 before sending them home. Consider hosting parent forums in conjunction with PTSA and FEAT teams to allow for Q&A. Distribute materials annually to parents/caregivers of Kindergartners and other District new students, as well as all students entering high school.

Response: Accepted and in Progress - Materials are in progress and will be printed in January and February 2016. SCRO, Health Education, and Communications will come up with roll-out campaign with School and Family Partnerships (SFP) and Family Engagement Action Teams (FEAT), School and Community Partnership (SCP), and Principals, and is considering parent forums with Seattle General Council PTSA. To support staff, district will also develop internal resources and announce the Washington Coalition of Sexual Assault Programs' (WCSAP) free Webinar (live on March 23, 2016, then posted online), "A Safer Family. A Safer World: How to Talk to Parents about Child Sexual Abuse," and encourage Principals, Counselors, Health Teachers, and others to participate either live or later.

Exploring – We are exploring the possibility of sending these packets via U.S. m. If the cost

is prohibitive, they will be sent home in sealed envelopes via “kid mail” in April 2016 in conjunction with Child Abuse Prevention and Sexual Assault Awareness Month. Due to cost and to avoid redundant information, these materials may not be re-printed annually, but they will be posted on external and internal websites, and prevention information may be re-emphasized with different annual awareness campaigns.

D. Well-organized, comprehensive, and prominent web site information

D.1, 2, 3, and 4 With input from Task Force, develop a new Title IX web page and post resources in multiple languages on district website and main page. This all went live September 29, 2015.

Response: Completed. See, http://www.seattleschools.org/district/title_ix/resources/ The district has a flier “What is Sexual Harassment? and How Do you Report it?” in schools and online, which is available in English, Amharic, Arabic, Cambodian, Chinese, Japanese, Korean, Marshallese, Nepali, Punjabi, Russian, Samoan, Somali, Spanish, Tagalog, Ukrainian, and Vietnamese. It also has another flier “Information for those Affected by Sexual Harassment” available at schools and online in English, Amharic, Chinese, Oromo, Somali, Spanish, Tagalog, Tigrinya, and Vietnamese.

Additional action - Student Civil Rights Compliance Officer (SCRO) and staff in the Office of Student Civil Rights will continue to work on this in conjunction with the Communications Department (see C.1) to keep this well-organized, up-to-date, and comprehensive.

E. Establish permanent Title IX Office at the district level

E.1, E.2 and E.3 With Task Force assistance, hire a qualified Title IX Coordinator and within 90 days of SCRO hiring, respond to Final Recommendations and Interim Title IX Coordinator Report.

Response: Completed - SCRO was hired and started October 22, 2015; SCRO has been acting as Interim Title IX Coordinator and has started staffing the Office of Student Civil Rights, including the Title IX Coordinator (hired and to start 1/19/16). Task Force members participated in the hiring processes.

Additional action - This response to the final recommendations will be posted on the Title IX website within one week of this meeting.

F. Create a comprehensive set of policies for the response to Title IX complaints

F.1 Within 90 days of hiring of SCRO and Title IX Coordinator, create a manual of protocols following the recommendations outlined by the Interim Title IX Coordinator that address issues with intake, support for complainants and respondents, sexualized cyber-bullying, safety plans and no contact orders, and investigations.

Response: Accepted and in Progress - This will be done in collaboration with the SCRO within first 90 days of Title IX Coordinator’s start date, i.e. by April 17, 2016. However, where policy and procedure changes are required to go through board and community process the actual finalization may take longer.

F.2 and 3 Create a uniform, centralized process for recordkeeping of harassment allegations, produce an annual report, and hire additional investigators.

Response: Accepted and in Progress – The annual report is required by board policy and superintendent procedure 3208 and 3208SP and recordkeeping is required by state and federal laws. Complaints are being tracked for the 2015-2016 for the annual report due in August 2016. However, see below, because a better record-keeping system is needed than Excel spreadsheets in siloed departments, OSCR is exploring off-the-shelf case management system and costs, which may be able to be shared with Human Resources, the General Counsel’s office, and Ombudspersons. A currently posted Harassment, Intimidation, and Bullying (HIB) Investigator job description (for complaints under Policy 3207) indicates that person will also handle discrimination complaints. At this time, it is unclear what the extent of the workload will be for the Title IX Coordinator. If needed, requests for additional resources will be made, but will be contingent on budget and other resources.

G. Establish Title IX compliance infrastructure in each building

G.1 - Identify and train a Title IX Compliance Officer in each school building. Currently the principal is designated as the Title IX Compliance Officer with only minimal training. Give consideration to identifying at least two people at each school, provide them sufficient training to comply with the legal requirements of Title IX, and ensure they are given the necessary resources and District support to fulfill this role.

Response: Accepted and in Progress - Principals received training in Spring 2015 and all staff were notified on December 17, 2015, of revisions to 3208SP, including that they cannot delegate authority without approval of the Title IX Coordinator. We are looking at future training opportunities, including online trainings, for this spring, summer, and fall.

G.2 In addition to the school Title IX Compliance Officer, designate at least one staff person, such as a teacher or school counselor, known to the entire student body as a “Safe Person” for issues related to sexual harassment and sexual assault, to provide support, answers and education for students. Clearly identify this staff member and provide specialized training in sexual assault and sexual health for them along with each school’s Title IX Compliance Officer.

Response: Exploring - The SCRO has considered and likes this idea, and will work with the LGBTQ Advisory Committee to see if we can combine efforts to implement it in 2016-2017.

H. Establish community trust on Title IX issues

H.1 Create an ongoing Advisory Committee based on the work of the SHSA Task Force ensuring the inclusion of members from marginalized communities that reflects the geography and diversity of SPS.

Response: Accepted and in Progress - SCRO will begin Advisory Committee formation and outreach efforts in Spring 2016.

H.2 Ensure that timely and transparent reports of progress on Title IX issues are made to the public and the school board.

Response: Accepted and in Progress - Since the SCRO came onboard on October 22, 2015, the board has been kept apprised of actions regarding actions under Policy 3208. Information is on the Title IX website, in Friday Memos, and, now, in Operations Committee meeting minutes. OSCR will be working with the Communications Office on these issues.

I. Provide adequate counseling services to students through appropriate caseloads.

I.1 Follow the recommended guidelines of the American School Counselors Association (ASCA) and employ a counselor for every 250 students. At a minimum, ensure there is a counselor in every school.

Response: Rejected – The District recognizes the need, but does not currently have the resources to achieve this standard.

I.2 Support counselor job duties by following the objectives of the ASCA model. Provide appropriate guidance and resources to ensure this happens in every school.

Response: Accepted and in Progress - SPS will continue to educate counselors on their role in helping to minimize the impact of harassment and assault on students' ability to be successful in school. This will be part of the secondary counselors' annual five-day professional development.

J. Provide appropriate training for staff and teachers

J.1 Train all staff and teachers and provide at-hand resources regarding legal compliance with Title IX as it relates to sexual harassment and sexual assault. Plan future staff trainings, beginning in the 2015-16 school year, according to responses received in key informant survey.

Response – Accepted – Staff in OSCR and Human Resources are working with the Principal Leadership Learning Team to develop this training.

J.2 Train all staff and teachers and have at-hand resources that will help them identify and respond to incidents of sexual harassment and sexual assault that affect the educational environment so they are able to appropriately process complaints. Topics of special interest and appropriate for each building and grade level have been identified in the key informant survey. Continue to provide training that is responsive to future key staff surveys.

Response – Accepted - District will provide training as required and based on key informant surveys, and OSCR will develop administrative procedures and resources on the MySPS site.

J.3 Ensure all staff know a) who their points of contact for Title IX are at the school and District level; b) how to implement Superintendent Policy 3208; and c) when mandatory reporting is required.

Response: Accepted and in Progress - The SCRO is updating information, providing notice and training on the revised 3208SP, and planning training to be provided in 2015-2016 on tracking and investigating complaints and mandatory reporting requirements, which is also required under Policy 3207.

K. Increase resources for primary prevention

K.1 Reinstate health classes as a required core semester-long class in middle schools. Early adolescence is the ideal age for students to receive prevention education, particularly with regard to drug and alcohol education, sexual health, and sexual assault prevention. We recommend including the full FLASH curriculum in a reinstated middle school health class (rather than a small number of lessons within a middle school science class) as part of a comprehensive overhaul of health education in the District. Note: This recommendation was strongly echoed by school staff in the SHSA key informant survey.

Response: Rejected and/or Requiring Board and Budget Action - The District recognizes the need to provide additional and ongoing training and support to middle school science teachers on how best to incorporate and teach the Family Life and Sexual Health (FLASH) curriculum. This training would require funding to pay for release time for middle school teachers. We will add this to our 2016-17 budget request to be considered during the prioritization process.

K.2 Provide more central support at the District for Health Education Managers, including increased FTE. These positions are critical to train and support health teachers. Only modestly increasing time for Health Education Managers may not address this issue. This recommendation involves training all teachers who teach FLASH curriculum in 5th through 12th grade, and providing building oversight and support to teachers to ensure these lessons are being taught with fidelity.

Response: Partially accepted - To accomplish this, the District will add a modest staff increase to SPS' 2016-17 budget request to be considered during the prioritization process.

L. Emphasize creating a district wide climate for gender equity and against harassment

L.1, 2, and 3 Current SPS health education is unacceptably insufficient. It generally consists of two weeks in 5th grade, some lessons in middle school, and the option of one semester in 9th grade, but is inconsistently administered. The District and School Board should expand health education, social and emotional skill-building, and violence prevention equitably into all grades by: (a) exploring ways to ensure approved FLASH curriculum is taught consistently and comprehensively and (b) designate the FLASH curriculum's sexual assault prevention series as one of the mandatory modules/priority lessons to be taught in health classes at all applicable grade levels. The district should use also research-based and/or proven program content to increase social emotional learning and sexual health/relationship skills in student curriculum and instruction by focusing both on (a) student skill-building and (b) improving school climate to prevent sexual harassment and sexual assault with. Work with sexual assault prevention experts to include sexual assault

prevention concepts (such as boundaries and consent) into current curriculum.

Response: Requires Board Approval – This recommendation is worthy of Board discussion, but they are issues for the Board, Health Education, and Curriculum and Instruction.

L3 Formalize partnerships with experts in the field who specialize in sexual assault, trauma, and social emotional health; build on current efforts for students' social emotional health into basic education; and ensure that social emotional interventions and supports are available to all students, with particular attention to students who have been both victims and aggressors of sexual harassment and sexual assault.

Response: Accepted and in Progress - SCRO and Title IX Coordinator are working on partnerships with Northwest Association of Title IX Administrators, King County Sexual Assault Response Network, and Puget Sound Coalition for BTLG Survivors of Abuse.