NATIONAL WOMEN'S LAW CENTER
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March 15, 2022

The Office of Information and Regulatory Affairs
The Office of Management and Budget
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To Whom it May Concern:

As civil rights advocates and advocates for student survivors of sexual harassment, we are pleased that the Department of Education ("the Department") has begun the process of undoing the Trump administration's vitiation of civil rights protections for students. The changes to the Title IX rule finalized in 2020 ("2020 Rule") require schools to ignore many instances of sexual harassment and impose uniquely unfair and burdensome procedures. Other changes to the Title IX rule put students at greater risk of experiencing sex discrimination from institutions claiming religious exemptions, and with less transparency. We urge the Department to replace the 2020 Rule by promulgating a rule consistent with Title IX's broad purpose to prevent sex-based discrimination in education. Below are our recommendations as to what we believe are the most crucial changes the Department must make to ensure schools effectively address sexual harassment and other sex discrimination.

I. Restore the Department's Previous Definition of Sexual Harassment and Reinstate the Standard for Administrative Enforcement Consistent with Title IX's Purpose to Increase Protections for Student Survivors and Prevent Sex-Based Discrimination in Schools

Sexual harassment[1] in schools is extremely pervasive and has a serious impact on educational access, yet student survivors frequently do not get the support they need. They are often ignored or disbelieved when reporting harassment, which results in them losing access to educational benefits; thus, survivors often withdraw from classes, struggle to participate in school activities, including athletics,[2] or

[1] In accordance Title IX case law and OCR guidance, we use the term "sexual harassment" in this letter to include a variety of sexual misconduct, which includes sexual assault.

[2] For example, student athletes, who experience high rates of sexual harassment, often fail to speak out about sexual harassment, frequently due to the fear they may lose access to the benefits of participation on a team sport, such as a sports scholarship or status on a team. *See* Campus Sexual Abuse By Authority Figures, Lauren's Kids (August 2021) https://laurenskids.org/wp-content/uploads/2021/08/21-CRU-001-Campus-Sex-Abuse-Report-V2_5.pdf (finding that "more than 1 in 4 current and former college male and female athletes said they endured inappropriate sexual contact from a campus authority figure" and often do not report it due to pressure because "…playing college sports is their ticket to college and a pro career. They simply aren't willing to risk losing a scholarship or a starting position on a team by disclosing what's going on.'").

drop out. This impact is felt especially by women and girls of color,[3] LGBTQI+ students,[4] and disabled students,[5] all of whom face stereotypes casting them as less credible. Countering the negative impact of sexual harassment on educational access requires robust protections under Title IX—yet, even with developments in enforcement of Title IX over the years, the prevalence of harassment continues, and schools continue to fail to respond effectively. This reality makes clear that the Department should never have scaled back Title IX regulatory protections in the first place.

It has been the longstanding policy of the Department to maintain broad protections against sexual harassment, consistent with the protections against harassment on the basis of race, color, national origin, and disability.[6] For decades before the 2020 Rule, the Department defined sexual harassment as any "unwelcome...conduct of a sexual nature," and schools were required to respond to student-on-student harassment if the harassment was "so severe, pervasive, *or* persistent that it limited a student's ability to participate in or benefit from the education program," when "the school knows or reasonably should have known" about the harassment.

The 2020 Rule departs from this significantly. Now, schools *must* dismiss Title IX complaints of sexual harassment unless the harassment is "so severe, pervasive, *and* objectively offensive that it

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[3] Girls of color, especially Black girls, are often stereotyped as "promiscuous" and thus less deserving of protection from sexual harassment—resulting in their reports of sexual misconduct being dismissed or disbelieved. *See, e.g.*, Nancy Chi Cantalupo, *And Even More of Us Are Brave: Intersectionality & Sexual Harassment of Women Students of Color*, 42 HARV. J.L. & GENDER 1, 16, 24-29 (2018); Georgetown Law Center on Poverty and Inequality, *Girlhood Interrupted: The Erasure of Black Girls' Childhood*, 1 (2018), https://www.law.georgetown.edu/poverty-inequality-center/wp-content/uploads/sites/14/2017/08/girlhood-interrupted.pdf.

[4] LGBTQI+ individuals are stereotyped as "hypersexual," "immoral," or "deviant," as well as "attention-seeking." As such, they are frequently disbelieved or blamed for their own victimization when reporting sexual misconduct. *See, e.g.*, Gillian R. Chadwick, *Reorienting the Rules of Evidence*, 39 CARDOZO L. REV. 2115, 2118 (2018), http://cardozolawreview.com/heterosexism-rules-evidence; Laura Dorwart, *The Hidden #MeToo Epidemic: Sexual Assault Against Bisexual Women*, MEDIUM (Dec. 3, 2017), https://medium.com/@lauramdorwart/the-hidden-metoo-epidemic-sexual-assault-against-bisexual-women-95fe76c3330a.

[5] Students with disabilities are often cast as less credible, especially if they struggle to communicate sexual misconduct due to a cognitive or development disability. *See, e.g.*, The Arc, *People with Intellectual Disabilities and Sexual Violence* 2 (Mar. 2011), https://www.thearc.org/document.doc?id=3657; Nat'l Inst. of Justice, *Examining Criminal Justice Responses to and Help-Seeking Patterns of Sexual Violence Survivors with Disabilities* 11, 14-15 (2016), https://www.nij.gov/topics/crime/rape-sexual-violence/Pages/challenges-facing-sexual-assault-survivors-with-disabilities.aspx.

[6] *See generally* Questions and Answers on Title IX and Sexual Violence (Apr. 29, 2014), https://www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf [hereinafter "2014 Q&A"]; Dear Colleague Letter on Sexual Violence (Apr. 4, 2011), https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf [hereinafter "2011 DCL"]; Dear Colleague Letter: Harassment and Bullying (Oct. 26, 2010), https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.html [hereinafter "Bullying Guidance"]; Dear Colleague Letter (Jan. 25, 2006), https://www2.ed.gov/about/offices/list/ocr/letters/sexhar-2006.html [hereinafter "2006 DCL"]; Revised Sexual Harassment Guidance, 66 Fed. Reg. 5,512 (Jan. 19, 2001), https://www2.ed.gov/about/offices/list/ocr/docs/shguide.html [hereinafter "Revised Sexual Harassment Guidance"]; Dear Colleague Letter on Prohibited Disability Harassment (July 25, 2000), https://www2.ed.gov/about/offices/list/ocr/docs/disabharassltr.html [hereinafter "Disability Harassment Guidance"]; Sexual Harassment Guidance, 62 Fed. Reg. 12,034 (Mar. 13, 1997) [hereinafter "1997 Guidance"]; Racial Incidents and Harassment Against Students at Educational Institutions; Investigative Guidance, 59 Fed. Reg. 11,448 (Mar. 10, 1994), https://www2.ed.gov/about/offices/list/ocr/docs/race394.html [hereinafter "Racial Harassment Investigative Guidance"].

effectively denies a person equal access to the recipient's education program or activity,"[7] and *must* dismiss Title IX complaints of much harassment that occurs off-campus, regardless of its impact on a student's access to education.[8] The rule also imported the stringent standard for private Title IX suits seeking monetary damages to the Department's administrative enforcement scheme.[9] It replaced the "known or should have known" with a much higher bar for liability: a complainant must prove a school was *deliberately indifferent* to sexual harassment of which it had *actual knowledge*.[10]

This definition of sexual harassment and new enforcement standard significantly weakens protections against sexual harassment in schools. Further, it chills reporting of sexual harassment by requiring students to meet an extremely high bar of misconduct; it also endangers students by forcing them to suffer repeated harassment until it can be deemed sufficiently "severe, pervasive, *and* objectively offensive" for a school to respond. The mandatory dismissal of complaints that do not involve sexual harassment on-campus or during an off-campus school activity also unfairly treats students differently based on the location of their harassment—foreclosing scores of students who are assaulted off-campus[11] or during a study abroad program from recourse, regardless of the impact of the harassment on the student's ability to equally participate in education. The rule constraining schools in this way from preventing and addressing sexual harassment impermissibly flouts Title IX's purpose to prevent sex discrimination in education.

The 2020 Rule also inappropriately treats sex-based harassment differently from other forms of harassment under OCR's jurisdiction. Until the 2020 Rule, the Department has consistently applied the same standard for schools' liability for harassment of students on the basis of sex, race, color, national origin, and disability: that is, schools must respond to harassment of students on these bases if the harassment is "severe, pervasive, *or* persistent so as to interfere with or limit a student's ability to participate in or benefit from [a school's] services."[12] Unilaterally changing the sexual harassment standard to require different treatment of sex-based harassment complaints than other types of harassment complaints requires schools to engage in unlawful sex discrimination in their harassment responses. Further, it signals to survivors that their experiences and inability to access educational benefits will be

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[7] 34 C.F.R. § 106.30(a). The Final Rule also requires mandatory dismissal of sexual harassment that does not constitute "quid pro quo harassment" by a school employee, or an incident that falls within the definition of "sexual assault," "dating violence," "domestic violence," or "stalking" under the Clery Act. *Id.*

[8] *Id.* at § 106.44(a).

[9] In doing so, the 2020 Rule conflates the purpose of suits for monetary damages with the Department's administrative enforcement authority by applying the standard for money damages to the administrative enforcement authority of Title IX. For decades before, the Department acknowledged this distinction, citing the Supreme Court's recognition that Title IX private lawsuit standard may differ from administrative enforcement standards given the Department's power to "'promulgate and enforce requirements that effectuate [Title IX's] nondiscrimination mandate." *See* Revised Sexual Harassment Guidance, iii–iv (citing *Gebser v. Lago Vista Indep. Sch. Dist*., 524 U.S. 274, 292 (1998)).

[10] 34 C.F.R. § 106.44(a).

[11] Off-campus sexual victimization of college and university students is more common than on-campus victimization, with a significant portion of victimization occurring in off-campus student housing. Further, it is becoming increasingly common for college and university students to move off-campus; as of 2016, 87% of college and university students live off-campus. *See*, *e.g.*, Nat'l Inst. of Justice, *The Sexual Victimization of College Women* 18-19 (2000), https://www.ojp.gov/pdffiles1/nij/182369.pdf; Rochelle Sharpe, *How Much Does Living Off-Campus Cost? Who Knows?*, N.Y. TIMES (Aug. 5, 2016), https://www.nytimes.com/2016/08/07/education/edlife/how-much-does-living-off-campus-cost-who-knows.html.

[12] Bullying Guidance at 2 (emphasis added). *See also* Disability Harassment Guidance; Racial Harassment Guidance.

taken less seriously, which particularly harms women and girls of color,[13] LGBTQI+ students,[14] and disabled students.[15]

Finally, the 2020 Rule included a preemption provision that preempts state or local law to the extent there exists a conflict between these laws and the rule.[16] Consequently, even if state or local law mandates that schools afford student survivors more robust protections against sexual harassment, the 2020 Rule now bars them from doing so if those protections conflict with the rule. We urge the Department to ensure that Title IX can act as a "floor" for protections—as other federal civil rights laws typically do—so schools are permitted to create additional protections for their students.

II. Jettison Overly Prescriptive Rules for School Disciplinary Procedures to Facilitate Reporting of Sexual Harassment, School Flexibility, and Ensure Equitable Resolution of Sexual Harassment Complaints

Longstanding Title IX rules require that schools implement grievance procedures for sexual discrimination that allow for the "equitable resolution" of complaints,[17] which requires the process be fair to all parties.[18] The Department has also recognized that schools must be afforded flexibility when responding to sexual harassment, based on the needs of students and institutional and administrative differences.[19]

Despite the need to schools to have some flexibility in developing grievance procedures, the 2020 Rule creates an overly prescriptive scheme, such that schools have little to no discretion in resolving sexual harassment complaints.[20] Further, the rule unilaterally imposed these prescriptive requirements for grievance procedures addressing sexual harassment alone—not any other form of harassment, discrimination, or misconduct. For example, it requires direct, live cross-examination of all parties and witnesses by a party's advisor of choice, which creates a chilling effect in reporting[21] and is unnecessary

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[13] *See, e.g.*, Nancy Chi Cantalupo, *supra* note 3; *Girlhood Interrupted*, *supra* note 3.
[14] *See, e.g.*, Gillian R. Chadwick, *supra* note 4; Laura Dorwart, *supra* note 4.
[15] *See, e.g.*, *People with Intellectual Disabilities & Sexual Violence*, *supra* note 5; Nat'l Inst. of Justice, *supra* note 5.
[16] 34 C.F.R. § 106.6(h).
[17] 34 C.F.R. § 106.8(c).
[18] *See, e.g.*, 2014 Q&A at 26; 2011 DCL at 12; Revised Sexual Harassment Guidance at 22.
[19] *See* 2014 Q&A, at 14. The Department acknowledged that a school's disciplinary procedures may "vary...[to] reflect[] differences in the age of its students, school size and administrative structure, state or local legal requirements (e.g., mandatory reporting requirements for schools working with minors), and what it has learned from past experiences.)"
[20] The American Council on Education (ACE) submitted a comment to the Proposed Rule advocating for affording schools flexibility in designing their grievance procedures. Pointing specifically to the live cross-examination requirement, ACE noted "that the NPRM imposes highly legalistic, court-like processes." ACE's comment explained that these prescriptive grievance procedures were "wildly inappropriate....in an educational setting" since "[c]olleges and universities are not...courts"—and yet all schools, regardless of size, must use this "'one-size-fits-all' judicial-like process." Letter from American Council on Education to Betsy DeVos, Sec'y, Dep't of Educ., at 1 (Jan. 30, 2019) https://www.regulations.gov/comment/ED-2018-OCR-0064-104712.
[21] *See, e.g.*, Suzannah Dowling, *(Un)due Process: Adversarial Cross-Examination in Title IX Adjudications*, 73 ME. L. REV. 123, 159 (2021); University of Michigan Annual Report Regarding Student Sexual & Gender-Based Misconduct & Other Forms of Interpersonal Violence, July 2018-June 2019 at 1 (Nov. 11, 2018), https://studentsexualmisconductpolicy.umich.edu/files/smp/FY-2019.pdf (showing a decrease in reporting during the year a school implemented direct cross-examination). The Department's "live-hearing" requirement by which complainants must submit to cross-examination received significant push-back by mental health experts during the Notice of Proposed Rulemaking. Over 900 mental health experts specializing in trauma authored a letter opposing the Department's "live-hearing" requirement, explaining that subjecting a student survivor of sexual assault to cross-

for ensuring that grievance procedures are reliable and thorough.[22] Additionally, one such procedural requirement that bars post-secondary institutions from considering statements from a party or witness who refuses to be cross-examined or does not answer every question posed during cross-examination,[23] has since been vacated by a federal district court as unlawful.[24] The 2020 Rule also flouts the Department's policy that grievance procedures be equitable by mandating a presumption of non-responsibility in school disciplinary proceedings.[25] A procedure that tilts proceedings in favor of respondents these ways is clearly inequitable. It also perpetuates the myth that survivors lie and are less trustworthy, and especially hurts women and girls of color, LGBTQI+ students, and disabled students, who are often deemed intrinsically less credible when reporting sexual misconduct.

Restoring long-standing Departmental standards for addressing sexual harassment would ensure that schools' grievance procedures are actually equitable and do not discourage reporting, while providing schools with sufficient flexibility in designing their disciplinary process.

III. The Department Must Conduct an Appropriate Cost-Benefit Analysis that Considers the Cost of Experiencing Sexual Harassment to Students and the Cost of Not Addressing Sexual Harassment to Schools.

In addition to betraying the spirit of Title IX, the Department justified the changes in the 2020 Rule by engaging in a perfunctory cost-benefit analysis. When the Department published its Notice of Proposed Rulemaking prior to the publication of its 2020 Rule, it claimed that the Proposed Rule would decrease the number of Title IX investigations conducted by schools and thus save schools $99.2 million annually.[26] Reducing the number of investigations contravenes the purpose of Title IX because it ensures that schools ignore more sex discrimination. Moreover, the Department failed to account for the significant cost reducing investigations would impose on survivors, including foreclosing students from accessing justice and supportive measures to be able to feel safe and welcomed in school.

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examination was "almost guaranteed" to worsen symptoms associated with post-traumatic stress, and was "likely to cause serious to harm victims who complain and to deter even more victims from coming forward." Letter from 902 Mental Health Professionals and Trauma Specialists to Kenneth L. Marcus, Ass't Sec'y for Civil Rights, Dep't of Educ., 4-5 (Jan. 30, 2019), https://www.regulations.gov/document?D=ED-2018-OCR-0064-104088.

[22] Notably, several appellate courts have affirmed that the use of an inquisitorial model—the hallmark of which is having parties pose each other questions through a neutral intermediary—does not offend due process rights of parties when used in the context of school disciplinary hearings. *See, e.g.*, Walsh v. Hodge, 975 F.3d 475, 485 (5th Cir. 2020); Doe v. Univ. of Arkansas-Fayetteville, 974 F.3d 858, 867–78 (8th Cir. 2020); Doe v. Colgate Univ., 760 F. App'x 22, 33 (2d Cir. 2019); Haidak v. University of Massachusetts, 933 F.3d 56, 68–70 (1st Cir. 2018); Butler v. Rector & Bd. of Visitors of Coll. of William & Mary, 121 F. App'x 515, 520 (4th Cir. 2005); Nash v. Auburn Univ., 812 F.2d 655, 664 (11th Cir. 1987); Doe v. Westmont Coll., 34 Cal. App. 5th 622, 635 (Cal. Ct. App. 2019).

[23] *See* 34 C.F.R. § 106.45(b)(6)(i).

[24] Last summer, the U.S. District Court for the District of Massachusetts vacated this portion of the Final Rule, holding it was arbitrary and capricious in violation of the Administrative Procedures Act. *See* Victim Rights Law Ctr v. Cardona, No. CV 20-11104-WGY, 2021 WL 3185743, at *61 (D. Mass. July 28, 2021).

[25] The 2020 Rule requires many schools to use the clear and convincing evidentiary standard instead of the preponderance of the evidence standard in school proceedings assessing whether sexual harassment occurred—even if the school uses the preponderance of the evidence standard to address other kinds of student misconduct. This is because the rule requires schools to use the same standard of evidence for sex-based harassment complaints against students as for formal complaints against employees. *See* 34 C.F.R. § 106.45(b)(1)(vii).

[26] *Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance*, 83 Fed. Reg. 61,462 (Nov. 29, 2018).

In promulgating changes to the Title IX rule, the Department should undertake a cost-benefit analysis that takes into account how the regulations protect an individual's access to an education program or activity if they experienced harassment by considering at least the following:

- The cost borne by survivors and the school community when schools ignore sexual harassment.
- The impact of experiencing sexual harassment in education on victims, including the short-term and long-term costs, which include financial, health, and other costs to education.
- The extent to which the regulations will impact the prevalence of harassment experienced by students and school employees, and the impact the regulations will have on victims reporting harassment to schools to obtain support and relief.

IV. The Department Should Clarify Protections for LGBTQI+ Students.

LGBTQI+ students experience many sorts of discrimination in schools,[27] including high rates of harassment[28] and violence in schools, disparate discipline, intentional misgendering and misnaming, exclusion from school activities, and punishment under dress and grooming codes for failing to conform to sex stereotypes. In addition to the discrimination LGBTQI+ students face in schools, 2022 has seen a record number of anti-LGBTQI+ bills targeting students. In light of this reality, and in line with the U.S. Supreme Court's decisions in *Bostock*[29] and *Price Waterhouse*,[30] and other relevant federal court decisions, the Department's Title IX regulations should make clear that discrimination "on the basis of sex" includes discrimination based on sexual orientation, gender identity, transgender status, and sex characteristics, and that students must be able to access sex-segregated spaces and participate in school sports according to their gender identity.[31]

V. The Department Should Undo Changes to the Title IX Rules That Expanded the Ability to Discriminate on the Basis of Sex in the Name of Religion.

We urge the Department to reverse two separate changes made to the Title IX regulations in 2020 that have allowed more institutions to claim a religious exemption and discriminate against students on the basis of sex, with less transparency. First, the changes made with the 2020 Title IX sexual harassment rule explicitly assure institutions that they need not provide advance notice to the Department—and thereby, to students, families, and the public—of their intention to rely on the religious exemption from Title IX in particular contexts.[32] This change enables important information to be obscured from students and their families about the risks of sex discrimination at such institutions, including unequal treatment

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[27] Valerie A. Earnshaw, et al., *LGBTQ Bullying: Translating Research to Action in Pediatrics*, 1 PEDIATRICS 140 (2017).

[28] GLSEN, The 2019 National School Climate Survey 28 (2020), https://www.glsen.org/research/2019-national-school-climate-survey (In a 2019 national survey of LGBTQI+ students, an overwhelming majority (81.0%) were verbally harassed because of their sexual orientation, gender expression, or gender identity, and more than one in three (35.1%) reported that they were verbally harassed often of frequently. Over one-third (34.2%) of LGBTQI+ students were shoved, pushed, or otherwise physically harassed because of their sexual orientation, gender expression, or gender.).

[29] Memorandum of Principal Deputy Assistant Attorney General Pamela S. Karlan, Civil Rights Division, "Application of Bostock v. Clayton County to Title IX of the Education Amendments of 1972" (March 26, 2021).

[30] Price Waterhouse v. Hopkins, 490 U.S. 228 (1989).

[31] Indeed, the Department has already explicitly recognized the application of *Bostock* to Title IX. *See Enforcement of Title IX of the Education Amendments of 1972 With Respect to Discrimination Based on Sexual Orientation and Gender Identity in Light of Bostock v. Clayton County*, 86 Fed. Reg. 32,637 (June 22, 2021).

[32] 34 C.F.R. § 106.8.

for women and girls, pregnant or parenting students, students who access or attempt to access birth control or abortion, and LGBTQI+ students, who are already especially vulnerable to discrimination. Moreover, allowing schools to not disclose their religious exemption is inconsistent with the Title IX rule that requires recipients to provide notice of their nondiscrimination policies.[33] A second, separate Title IX rulemaking in 2020 added sweeping new criteria broadening the category of institutions eligible for the religious exemption, which expands this already-broad exemption even farther beyond the statutory terms and OCR's prior, longstanding interpretation.[34] The Department should undo this change and give the religious exemption a narrow interpretation to ensure fewer institutions are discriminating against students and to effectuate Title IX's remedial purpose.

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Thank you for your consideration of our comment regarding protections against sex discrimination in schools in the Department of Education's Title IX rule. If you have any questions about this letter, please contact Emily Martin, (emartin@nwlc.org), Shiwali Patel (spatel@nwlc.org), or Hunter Iannucci (hiannucci@nwlc.org).

Sincerely,

National Women's Law Center, *joined by*

American Association of University Women

American Atheists

American Humanist Association

American Psychological Association

AnitaB.org

The Army of Survivors

Athlete Ally

Autistic Self Advocacy Network

Campus Pride

Center for LGBTQ Economic Advancement & Research (CLEAR)

Chicago Alliance Against Sexual Exploitation (CAASE)

Clearinghouse on Women's Issues

Clery Center

[33] *See* 34 C.F.R. § 106.8(b).

[34] Direct Grant Programs, State-Administered Formula Grant Programs, Non Discrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance, Developing Hispanic-Serving Institutions Program, Strengthening Institutions Program, Strengthening Historically Black Colleges and Universities Program, and Strengthening Historically Black Graduate Institutions Program; Final rule, 85 FR 59916, 59946-62 (Sept. 23, 2020).

Colorado Coalition Against Sexual Assault

Council of Parent Attorneys and Advocates

End Rape On Campus

Equal Rights Advocates

Equality California

The Every Voice Coalition

Faculty Against Rape

Feminist Majority Foundation

Fierberg National Law Group

Freedom From Religion Foundation

FORGE, Inc.

The Gender Violence Program at Harvard Law School

Girls Inc.

GLSEN

Human Rights Campaign

Interfaith Alliance

Intercultural Development Research Association (IDRA)

Iowa Coalition Against Sexual Assault

It's On Us

Jewish Women International

Kentucky Association of Sexual Assault Programs

Know Your IX

Ladder Consulting

Lawyers' Committee for Civil Rights Under Law

Maryland Coalition Against Sexual Assault

Movement Advancement Project

National Alliance to End Sexual Violence

National Alliance for Partnerships in Equity

National Council of Jewish Women

National Indian Education Association

National Women's Political Caucus

North Carolina Coalition Against Sexual Assault

PFLAG National

Public Counsel

Public Justice

Rocky Mountain Victim Law Center

SafeBAE

Stop Sexual Assault in Schools

Union for Reform Judaism

University Survivors Movement

UltraViolet

Women's Law Project

YWCA Greater Los Angeles