



Prevent • Intercede • Respond
to Sexual Harassment of K-12 Students

Leading a Safe Place to Learn





Contents

1 Introduction

1 Title IX and Sexual Harassment

2 Gender-Based Harassment

2 Discrimination as a Broader Issue

3 Correcting Issues

4 Relationship With Law Enforcement

5 Administrative Obligations

6 Title IX Coordinator Responsibilities and Authority

7 School Climate Factors

9 Trauma and the Growing Brain

9 Trauma-Sensitive Schools

10 Leadership Guidance

11 Work With Title IX Coordinators

12 Prohibit Retaliation

12 Recognize and Address Implicit Bias

14 Integrate With Existing Policies and Procedures

15 Prevent Sexual Harassment and Violence

19 Respond to Sexual Harassment and Violence

23 References

Introduction

Bringing about change requires commitment and consistent, dedicated leadership. It takes institutional introspection that allows for identifying strengths and weaknesses, recalibrating attitudes, relinquishing old habits that do not work, and embracing new ideas and methods that just might help.

This guide and the resource package incorporate and emphasize three topics for creating a school community committed to preventing sexual harassment, which includes sexual violence. **Title IX of the Education Amendments of 1972 (Title IX)** protects people from discrimination based on sex in education programs and activities that receive federal financial assistance. Among other sex discrimination prohibitions, Title IX protects against sexual harassment, including sexual violence. **Trauma sensitivity** is an approach to working with others that is designed to facilitate a sense of safety for all participants and incorporates into all interactions awareness and an understanding of trauma and its impact, whether or not trauma is recognized. **Positive school climate** fosters physical and psychological safety; promotes a supportive academic, disciplinary, and physical environment; and embraces respectful, trusting, and caring relationships throughout the school community.

Based on the assumption that every district has policies and procedures, required staff trainings, and a substantial in-service regimen to update their knowledge about a wide range of issues at school, this guide provides summary information and resources for further investigation on the three topics identified above, with an emphasis on preventing, interceding in, and responding to sexual harassment and violence.ⁱ It also contains guidance for leading your district to a new level of safety and respect for all participants in the educational community and for making every school a Safe Place to Learn. All resource documents provided here were downloaded from their original websites during August 2016.



To help track your progress...

Print [*Action Steps at a Glance*](#), and follow the information sequence with suggested resources for each action step.

Title IX and Sexual Harassment

Title IX protects students in connection with all academic, educational, extracurricular, athletic, and other programs and activities of the school, whether they take place in the facilities of the school, on a school bus, at a class or training program sponsored by the

ⁱ Because many cases of sexual harassment involve the power differential that characterizes bullying, the resource package includes the term when the intent is to reference the full range of sexually discriminatory behaviors.

school at another location, or elsewhere. In the course of school programs and activities, a number of sexually discriminatory behaviors potentially could arise and impede a student's ability to learn, including the focus of this resource: sexual harassment and violence.

Over the years, the U.S. Department of Education (ED), Office for Civil Rights (OCR) has provided guidance regarding sex discrimination. OCR works to ensure that educators grasp the scope of the statute as it relates to sexual harassment and all the nuances of sexual harassment, including sexual violence and retaliation, all of which can interfere with learning. OCR has also made clear that Title IX requires schools to adopt and publish grievance procedures that provide for the prompt and equitable resolution of sex discrimination complaints, including complaints of sexual harassment and violence. It has also provided additional guidance regarding what an appropriate investigation and response looks like in practice.

Gender-Based Harassment

Title IX also covers unwelcome conduct based on an individual's actual or perceived sex, including harassment based on gender identity or nonconformity with sex stereotypes. Known as gender-based harassment, unwelcome behaviors may include, but do not necessarily involve, conduct of a sexual nature. For example, some people think boys are supposed to dress or wear their hair certain ways, and they may allow their stereotypes to excuse making fun of a male student because the way he dresses or wears his hair does not fit with their ideas. This type of harassment is covered because it is sex-based and thus considered a form of sex discrimination.

Discrimination as a Broader Issue

School districts receiving federal funding are subject to multiple civil rights statutes prohibiting discrimination based on specific characteristics, legally identified as protected classes. These statutes, which OCR enforces, include the following:

- Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin.
- Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability.



To learn more about...

Recognizing and addressing sexual harassment under Title IX, [*Sexual Harassment: It's Not Academic*](#) and [*Revised Sexual Harassment Guidance*](#), OCR

Bullying and harassment, see [*Dear Colleague Letter: Harassment and Bullying*](#), OCR

Adult perpetrators of sexual harassment and violence at school, see [*A Guide for Administrators and Educators on Addressing Adult Sexual Misconduct in the School Setting*](#), ED, Readiness and Emergency Management for Schools

- Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability.
- Title IX of the Education Amendments of 1972 prohibits discrimination based on sex in federally funded education programs and activities.

OCR has issued *Dear Colleague Letters* and other guidance materials explaining district obligations under these civil rights statutes and clarifying the types of behavior that can be categorized as or related to harassment based on one of the protected classes, which is a form of discrimination. Identified types of behavior include bullying, sexual harassment, sexual violence, and retaliation. Thus, schools and their employees who encourage, tolerate, ignore, or inadequately address harassment based on race, color, national origin, disability, or sex may be violating one or more civil rights statutes when the severity of the harassment is such that it creates a hostile environment.

The Civil Rights Division (CRT) of the U.S. Department of Justice coordinates the four statutes that OCR enforces and others, including Title IV of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, sex, national origin, or religion.

Correcting Issues

Under Title IX, if a school knows or reasonably should have known that sexual harassment may have occurred, the school must take immediate and appropriate steps to investigate and determine what happened. A proper investigation begins promptly, proceeds impartially, and treats all parties equitably. An important aspect of the inquiry is to determine whether the harassment was sufficiently serious to limit or deny the student's ability to participate in or benefit from the school's educational program, which would constitute a hostile environment. If the investigation reveals that sexual harassment created a hostile environment, the school must then take prompt and effective steps reasonably calculated to end the sexual harassment, eliminate the hostile environment, prevent the harassment from recurring, and, as appropriate, remedy its effects.

This involves taking reasonable, timely, age-appropriate, and effective corrective action tailored to the situation. Actions may include counseling or sanctioning the doer; ensuring that the targeted student and one doing the unwanted behavior do not attend the same classes; providing counseling and academic support services such as tutoring to the targeted student; providing an escort to ensure that the targeted student can move



To learn more about...

Developing school procedures for responding to sexual harassment, see [*Revised Sexual Harassment Guidance*](#), OCR

School obligations for addressing sexual violence, see [*Dear Colleague Letter: Sexual Violence*](#) and [*Frequently Asked Questions*](#), OCR

safely between classes; and publicizing and providing information to employees, students, and parents on school district policies related to sexual harassment.

Title IX requires a school to protect the complainant and ensure his or her safety as necessary, including initiating interim protective measures (e.g., placing students in separate classes) before the final outcome of any investigation. In addition, a school should notify the student or the student's parents or guardians of the right to file a complaint with law enforcement. Title IX itself does not require a school to notify law enforcement, but a school may be required to report incidents to law enforcement under other federal, state, or local laws.

If a school has notice of sexual harassment of a student, including if a school employee directly observes the sexual harassment of a student, the school should contact the student (or parent or guardian, depending on the student's age), explain that the school is responsible for taking steps to correct the situation, and explain the policies and grievance procedures the school has in place to address sexual harassment. The school would then proceed with an investigation and take interim protective measures as necessary. Again, if the school determines that sexually harassing conduct that created a hostile environment occurred, the school must take reasonable, timely, age-appropriate, and effective corrective action tailored to the situation.

Title IX also protects students from sexual harassment, including sexual violence and sexual abuse, by school employees, and the same general Title IX principles apply. In some instances, however, a school's Title IX obligations regarding sexual harassment by school employees can be greater than those regarding sexual harassment by other students or third parties. Schools must develop policies prohibiting inappropriate conduct by school personnel and procedures for identifying and responding to such conduct. This could include implementing codes of conduct that address what is known as grooming, a desensitization strategy common in adult educator sexual misconduct. Detailed information can be found in the *Revised Sexual Harassment Guidance* and *Frequently Asked Questions* documents named in the previous text box.

Relationship With Law Enforcement

In some cases, conduct may constitute both sexual harassment under Title IX and criminal activity. OCR guidance makes it clear that while police investigations may be useful for fact gathering, because the standards for criminal investigations are different, police investigations or reports are not determinative of whether sexual harassment or violence violates Title IX.¹ Conduct may constitute unlawful sexual harassment under Title IX even if the police do not have sufficient evidence of a criminal violation. In addition, a criminal investigation into allegations of sexual violence does not relieve the school of its duty under Title IX to resolve complaints promptly and equitably.

A school should notify the harassed student and parent or guardian of the right to file a criminal complaint, and should not dissuade the student from doing so either during or after the school's internal Title IX investigation. For instance, if a student wants to file a police report, the school should not say that it is working toward a solution and instruct or ask the student to wait to file the report.

Schools should not wait for the conclusion of a criminal investigation or criminal proceeding to begin their own Title IX investigation. Schools must also take immediate steps to ensure the safety of the harassed student in the educational setting. For example, a school should not delay conducting its own investigation or taking steps to protect the student because it wants to see whether the alleged perpetrator will be found guilty of a crime. Any agreement or memorandum of understanding (MOU) with a local police department must allow the school to meet its Title IX obligation to resolve complaints promptly and equitably. Although a school may need to delay temporarily the fact-finding portion of a Title IX investigation while the police are gathering evidence, once notified that the police department has completed its gathering of evidence (not the ultimate outcome of the investigation or the filing of any charges), the school must promptly resume and complete its fact-finding for the Title IX investigation.

Moreover, nothing in an MOU or the criminal investigation itself should prevent a school from notifying harassed students and their parents or guardians of their Title IX rights and the school's grievance procedures, or from taking interim steps to ensure the safety and well-being of the complainant and the school community while the law enforcement agency's fact-gathering proceeds. OCR also recommends that a school's MOU include clear policies on when a school will refer a matter to local law enforcement.



To learn more about...

Working with law enforcement, see [ED-DOJ School Discipline Guidance Package](#) (see multiple bulleted items midway down the webpage), ED

Administrative Obligations

The administrative requirements in ED's Title IX regulations are designed to ensure that the school district maintains an environment free from unlawful sex discrimination throughout the educational experience; this includes academics, athletics, and extracurricular activities. Administrative requirements under Title IX include three primary tasks:

1. Publish a statement that the district does not discriminate on the basis of sex in its education programs and activities.
2. Adopt and publish grievance procedures that provide for the prompt and equitable resolution of student and employee complaints under Title IX. The district must make the procedures—from complaint filing through resolution—known to all members of the school community.

3. Designate at least one employee to be the Title IX coordinator, and distribute the coordinator's contact information to all students and employees. The job of the coordinator is to coordinate district efforts to comply with the statute and carry out its Title IX responsibilities.

Title IX Coordinator Responsibilities and Authority

The primary responsibility of the Title IX coordinator is to manage the school district's compliance with Title IX, including grievance procedures for resolving Title IX complaints. In an effort to ensure gender equity for everyone involved with a school in the district, OCR guidance describes coordinator responsibilities in detail. Title IX coordinator responsibilities may include:

1. Provide training and technical assistance on district policies related to sex discrimination and develop programs, such as assemblies on issues related to Title IX, to help each school make sure that all members of the educational community, students, and staff are aware of their rights and obligations under Title IX.
2. Ensure that information is easily accessible and provided in a clear, easy-to-read format.
3. Participate in coordinating the implementation and administration of procedures for resolving Title IX complaints:
 - Educate the educational community on the process for filing complaints,
 - Investigate complaints,
 - Work with law enforcement when necessary, and
 - Ensure that complaints are resolved promptly and appropriately.
4. The coordinator should manage the district's response to sex discrimination complaints, monitor outcomes, identify patterns, and assess effects on school climate and safety. Doing so is particularly important to avoid recurrences of sexual harassment and violence.
5. Assist the district in developing a method to survey school climate and coordinate collection and analysis of information from that survey.



To learn more about...

Title IX coordinator responsibilities, see [*Title IX Resource Guide*](#), OCR

Title IX coordinator authority, see [*Dear Colleague Letter: Title IX Coordinators*](#), OCR

School Climate Factors

School climate is a broad, multifaceted concept that involves many aspects of a student's entire educational experience. A positive school climate is the product of a school's attention to promoting a supportive academic, disciplinary, and physical environment that fosters physical and psychological safety while encouraging and maintaining respectful, trusting, and caring relationships throughout the school community.

Research supports the benefits of improving school climate for all students. Positive school climate has been shown to improve attendance, achievement, retention, and rates of graduation while at the same time reducing incidents of bullying, harassment, violence, and suicide.² A safe and supportive school climate includes conditions that affirmatively influence student learning, including:

Engagement. Strong relationships connect students, teachers, families, and schools while strong connections tie schools to the broader community. Engagement includes promoting respect for diversity and supporting everyone's participation in school activities.

Safety. Students participate in schools and school-related activities knowing they are safe both physically and emotionally from violence, bullying, harassment, and the presence of controlled substances.

Environment. The physical environment provides appropriate facilities and school-based mental, behavioral, social-emotional, and physical health supports. The social and cultural environment provides well-managed classrooms and a clear, fair disciplinary policy.

Positive school climate can be created through a coordinated, purposeful effort, using strategies that are practical, doable, and inexpensive. Many schools are already engaged in activities aimed at improving school climate such as Safe Schools, positive behavioral interventions and supports (PBIS), and restorative practices. Assessing your current efforts, then engaging school staff strategically to build on strengths and address issues, can help improve school climate while potentially reducing the likelihood that harassment, bullying, and sexual assault will occur.³



To learn more about...

School climate information, see [School Climate](#), American Institutes for Research (AIR) and National Center on Safe Supportive Learning Environments (NCSSLE)

Trauma Sensitivity

Those who contribute to a trauma-sensitive environment accept the fact that they cannot identify or know everyone around them who is affected by trauma. Staff members who understand trauma know that its effects can impair the ability to learn, participate academically, and develop socially. Trauma sensitivity therefore encourages a sense of physical and emotional safety for everyone.

People affected by trauma are everywhere: on the television news, returning from war zones, attending class, and working at your school. A look at the research on trauma explains why. Large-scale studies of exposure to trauma indicate that more than 60 percent of children and nearly 90 percent of adults have experienced traumatic events.^{4,5,6} These are intensely threatening incidents or ongoing conditions that have the capacity to create a lingering sense of powerlessness, shame, fear, and anxiety, all of which can affect health and quality of life long term.

Youth affected by trauma may respond intensely to ordinary events or objects, referred to as triggers, that remind them of their particular trauma. People who work with students need to be aware that explosive aggression or abrupt withdrawal could be a symptom of trauma. On a daily basis, difficulty concentrating (often associated with attention deficit disorder) can also be a symptom of trauma. Understanding the relationship between trauma and behavior can help staff respond in ways that do not trigger a student's trauma, leading to an escalation in disruptive behavior.

In the late 1990s, a seminal study of adverse childhood experiences (ACEs) screened more than 17,000 members of a health maintenance organization for events and conditions associated with abuse, neglect, and family dysfunction. Almost two thirds of respondents reported one or more such experiences, and those with one were likely to have more.⁷ The study also found a strong correlation between exposure and chronic health conditions, smoking, obesity, risky behavior, and early death.⁸ Though not all stressors produce the sense of powerlessness associated with trauma, the study helped reveal trauma's prevalence and impact.

Some Potential Causes of Childhood Trauma

- Sexual assault
- Abuse
- Neglect
- Divorce
- Natural disasters
- Traffic accidents
- Bullying
- Terrorism
- Unexpected death of loved one
- Medical procedures
- Witnessing violence
- Homelessness

Trauma and the Growing Brain

Among the most disturbing findings in studies of childhood stress are those indicating negative effects on the developing brain. Everyone has experienced the pounding heart and panting of the stress response, but for some people there is no relief from the effects of trauma. Their brains pump out stress response hormones, even under normal circumstances. Without adequate support from trusted adults, these neurochemicals can permanently alter the growing brain of a child or adolescent affected by ongoing maltreatment, poverty, or fear.⁹

As described by the Harvard University Center on the Developing Child, stress can be envisioned as occurring along a continuum. Positive stress helps a healthy person learn to deal with challenges and adversity. Tolerable stress comes with more severe events that create lingering pain. Supportive adults mitigate these types of stress for children, providing a buffer and helping them to assess and manage such events. Toxic stress, however, thrives in an environment of inadequate support, sustains an ongoing perception of threat, and proceeds to disrupt the brain architecture, something to which the developing brain of a young student is especially vulnerable. Such disruption can cause affected students to deal poorly with what usually would be considered positive stressors.¹⁰ As education professionals know, students bring their stress to school.

Fortunately, in the case of a single, intensely stressful event, some individuals are not traumatized at all and most are affected only temporarily. Not surprisingly, a strong and supportive family and efforts to promote resilience greatly reduce the long-term effects of trauma. Engagement with other supportive persons, another important protective factor, can be found in a positive school climate.



To learn more about...

Trauma exposure and impact, see [*Children and Trauma*](#), American Psychological Association

ACE data collection in individual states, see [*The ACE Study Continues*](#), Centers for Disease Control and Prevention (CDC)

Toxic stress effects on the brain, watch this two-minute video, [*Toxic Stress Derails Healthy Development*](#), Harvard University Center on the Developing Child

Trauma-Sensitive Schools

Schools that are sensitive to the effects of trauma promote positive educational outcomes for *all* students. This is because the five characteristics of a trauma-sensitive environment correspond to the components of a positive school climate, which also promotes compliance with Title IX obligations.

Awareness demonstrates an understanding among all staff of the prevalence and impact of trauma, a commitment to engage in compassionate and respectful behavior, and the ability to identify students who may be affected by trauma.

Safety ensures an institutional commitment to the physical and psychological safety of all participants. Expectations regarding behavior and respect for personal boundaries are clear. Policies and procedures for responding to crises and disciplinary issues are balanced, respectful, consistently enforced, and easy to find.

Trust develops from adhering to uniform and transparent practices and standards of professional conduct, avoiding assumptions, and using supportive approaches to discipline that are fair, consistent, and developmentally appropriate. Trust builds when all parties can be confident that sensitive information will be treated with respect and kept confidential where possible,ⁱⁱ each person will be honored, and individual well-being will be taken into account with every decision.

Empowerment invites input from the entire educational community; involves training staff at all levels; defines and respects the rights of students and staff; and promotes student development of positive relationships, self-regulation, academic competence, and a sense of well-being.

Cultural competence shows acceptance for human diversity through actions and words, recognizes that there are cultural differences in individual responses to trauma, and embraces the need to open oneself to recognizing personal biases of which one may be completely unaware.

In short, trauma-sensitive schools support the entire educational community by strengthening student academic competence, effectively managing emotional and behavioral challenges, and giving staff tools for understanding and navigating difficult situations.¹¹



To learn more about...

Creating trauma-sensitive schools, see [Safe Place](#), AIR and NCSSLE

Creating trauma-sensitive environments, see [Safe Place](#), AIR and NCSSLE

Trauma sensitivity at school, see [Creating Trauma-Sensitive Schools](#), National Association of School Psychologists, and [Creating Trauma-Sensitive Classrooms](#), National Association for the Education of Young Children

Leadership Guidance

Doing what is necessary to address discrimination, bullying, sexual harassment, and sexual violence in an equitable and timely manner requires administrative vision, commitment, and leadership. In addition to handling all the tasks required to keep

ⁱⁱ Exceptions being circumstances when the obligations of mandated reporters come into play and when law enforcement agencies must be notified.

schools and districts fulfilling their main mission of educating students, administrators are responsible for managing all the tasks involved in Title IX compliance, building school climate, and ensuring all staff are trained and using trauma-sensitive practices in their daily interactions with students. Administrative leadership is crucial to create conditions where the emphasis is on people, not programs, thus inspiring everyone to assume responsibility for changing and sustaining a positive school culture. This includes using a consistent, positive tone in regular communications with everyone, supporting staff so they feel respected (and in turn, respect their students), and genuine advocacy for creating and sustaining an atmosphere that fosters learning for all students.

Work With Title IX Coordinators

When school districts go beyond simply designating Title IX coordinators and provide them with visibility, sufficient training and support, and an appropriate level of authority, coordinators can be very effective in helping districts provide equal educational opportunities to all students.¹² Furthermore, the Title IX coordinator should be independent in order to avoid potential conflicts of interest posed by job responsibilities such as those assumed by a legal counsel, athletics director, or dean of students.¹³ Designating a full-time coordinator will minimize this risk and ensure sufficient time to do the job.

Larger school districts may need to have multiple coordinators. In that case, a lead Title IX coordinator should be designated to carry ultimate oversight responsibility. School districts should encourage all of their coordinators to work together to ensure consistent enforcement of all policies and obligations.

Visibility. It is the school district administrator’s job to make the role of the Title IX coordinator visible to the school community. This may include, but not be limited to, posting notices about the coordinator’s function and how to contact the coordinator, or lead coordinator if a district has more than one. Demonstrating the strong and visible role of the Title IX coordinator helps ensure that members of the educational community know and trust that this is someone they can reach out to for assistance.

Training. In most cases, districts will need to provide an employee with training to act as a Title IX coordinator. This training needs to cover Title IX as well as other applicable federal and state laws, regulations, and policies that overlap with Title IX, such as Title IV of the 1964 Civil Rights Act, with respect to public schools. Regular trainings should be provided to stay current with changes in laws, regulations, and policies.

Authority. Title IX coordinators are an important part of the school district team, but they can only be effective if they are provided with the appropriate authority and support necessary to carry out their duties and use their expertise to help the district comply with Title IX. This includes obtaining access to all of the district’s relevant

information, such as policies and procedures, as well as resources, such as information gathered for the Civil Rights Data Collection (CRDC).

Support. Title IX coordinators need to be involved at every stage of drafting, revising, and implementing Title IX policies and procedures, including providing technical assistance and programs that make everyone aware of their rights and obligations.

Prohibit Retaliation

Federal civil rights laws, including Title IX, make it unlawful to retaliate against anyone once a student, parent, teacher, coach, or other individual complains formally or informally to a school about a potential civil rights violation; participates in an investigation, hearing, or proceeding by OCR, CRT, or another federal agency; or advocates for the civil rights of others. Thus, schools should ensure that individuals are not intimidated, threatened, coerced, or discriminated against for engaging in such activity.¹⁴

OCR and CRT vigorously enforce the prohibition against retaliation to ensure that students and other school members are protected. If retaliation does occur, OCR and CRT may seek a school's voluntary commitment to resolve the situation and require other compliance activities such as staff trainings, communications strategies, and public outreach. Schools that refuse to voluntarily resolve identified issues may be subject to enforcement action.



To learn more about...

Data collected regarding equity, see [Civil Rights Data Collection \(CRDC\)](#), OCR

Guidance regarding retaliation, see [Dear Colleague Letter: Retaliation](#), OCR

Technical assistance for schools, see [Contact OCR webpage](#)

Recognize and Address Implicit Bias

Discussions about bullying and sexual harassment and violence can touch on sensitive racial, ethnic, and cultural issues. Unconscious judgments can affect the staff's ability to effectively interact with students, parents, and co-workers when it comes to addressing bullying and sexual harassment and violence.¹⁵ They can also come into play during efforts to develop a supportive learning environment. For meaningful change to occur, the school's administrators and other employees must engage in open communication and discussion about the presence and impact of implicit bias.

Careful planning, as well as thoughtful and sensitive facilitation, can support awkward or difficult discussions. Safe spaces can provide places for administrators and other staff to take risks to engage in conversation about important issues such as racism, sexual identity, disabilities, sexism, discrimination, and prejudice. Productive conversations emphasize growth rather than guilt and take place when everyone can share their thoughts in a safe, supportive environment and work toward equitable solutions.

Addressing implicit bias cannot be done in a single event or conversation; it is a continuous process. Leadership and sustained commitment are vital to helping staff take important steps toward addressing their own implicit bias and to seeing that bias through the eyes of a student.

1. Acknowledge that bias exists.
 - Start engaging in conversations to increase knowledge and address negative perceptions, stereotypes, and attitudes.
 - Become aware of individual perceptions, stereotypes, and their impact on decision making.
2. Come to terms with bias.
 - Foster opportunities for colleagues and students to get to know each other, their backgrounds, and diverse cultures to help suspend negative judgments.
 - Promote recognition that diversity is real, dynamic, and legitimate, and that there is more than one way to do things.
3. Create a plan to address bias.
 - Identify strategies based on data for your school to effectively engage parents or guardians, families, and the community to form partnerships for student achievement, positive outcomes, and a nurturing school climate.
 - Examine the application of Title IX policies and procedures related to students, including their interpretation of how these policies and procedures affect them.



To learn more about...

Obtaining and applying objective data for your school and use it to identify and address implicit bias, see [*Addressing the Root Cause of Disparities in School Discipline*](#), AIR and NCSSLE

Discovering your own implicit biases, see [*Implicit Association Test*](#), Harvard University

Recognizing gender bias, see [*Identifying and Preventing Gender Bias in Law Enforcement Response to Sexual Assault and Domestic Violence*](#), U.S. Department of Justice

Avoiding bias with transgender students, see [*Dear Colleague Letter: Transgender Students*](#), OCR

The field of study involved with identifying and addressing implicit bias is quite large and cannot be fully explored within the scope of this resource. Schools may wish to consider engaging someone from the community with the expertise to facilitate these conversations. In addition to facilitating regular opportunities for staff and all individuals who interact with students to talk about bias issues, it is important that everyone who interacts with students be trained in recognizing all forms of bias, including school resource officers and other safety agents. With regard to gender bias, it will also be important to involve your Title IX coordinator in every aspect of discussions, training, and revisions of policies and procedures.

Integrate With Existing Policies and Procedures

Schools and school districts that fulfill their Title IX obligations while using trauma-sensitive practices in the daily environment create safe schools that are attuned to the needs of students, families, staff, and the community. Trauma-sensitive schools support the academic success of students while providing tools for students and staff to be able to manage emotional, behavioral, or other difficult situations. Adherence to the law, combined with trauma-sensitive practices, creates a strong foundation for positive school climate.

All policies and procedures within a school and school district should support student access to a safe, supportive learning environment at all times. This includes not only specific policies and procedures aimed at Title IX compliance, but also discipline policies and codes of conduct, as discipline can overlap with Title IX issues. Making everyone aware of these policies and procedures communicates to the entire school community that bullying, sexual harassment, and violence will not be tolerated and anyone who engages in these behaviors will be held accountable. The more that appropriate strategies for supporting and protecting students are embedded in everyday policies, procedures, and practices, the more sustainable a positive school climate becomes, even in the event of staff turnover.

Many schools enact commonsense, developmentally-appropriate policy and procedural responses to incidents of bullying, sexual harassment, sexual violence, and other Title IX violations if they occur. To become more proactive and potentially to reduce the number of incidents, they also recognize that implementing strong prevention and intercession strategies, embedded in policies and procedures, is just as important. Policies should incorporate such themes as the following:¹⁶

- Encourage student growth and positive development.
- Promote a culture of healthy relationships.
- Encourage awareness education and early intercession.
- Provide clear, accessible response procedures.
- Outline developmentally appropriate, social and emotional empowerment strategies for those who are bullied or harassed.
- Hold those who have been abusive accountable while also providing opportunities for them to change.
- Use trauma-sensitive practices.
- Ensure protections by naming the characteristics for which discrimination is expressly prohibited, such as race; color; national origin; sex, including gender expression/identity; disability; or religion.

- Build strong collaborations between the school and parents, family, community agencies, and organizations to strengthen the school’s capacity to prevent, intercede, and respond to abuse.

Although it is not possible to detail every available strategy within the scope of this resource package, the next section of this guide highlights best practices that administrators can implement to **prevent**, **intercede in**, and **respond** to bullying and sexual harassment and violence.

Prevent Sexual Harassment and Violence

Positive school climate. Building positive school climate is a very effective tool for preventing and addressing a hostile environment that may violate Title IX and providing educational access for all students. This effort can begin with the Title IX coordinator, who is charged with helping a school develop ways, tailored to the school’s needs, to survey campus climate. The emphasis here is on the school and the district’s Title IX coordinator working together to evaluate whether any discriminatory attitudes pervade the school culture, and determining whether any harassment or other problematic behaviors are occurring, where they happen, which students are responsible, which students are targeted, and how those conditions may best be remedied. The ultimate goal is to prevent incidents from recurring or becoming systemic problems.¹⁷

In tandem with addressing climate from a Title IX perspective, a coordinated, purposeful effort to improve overall school climate is needed. Building and sustaining positive school climate efforts can be challenging. It involves bringing all staff members together, helping them develop strong relationships to foster connections between one another and with students, and providing appropriate and effective training and professional development. Teachers need to use and continually refine their classroom management strategies. School climate assessment also involves monitoring progress over a long period of time. Administrators thus play a crucial role in facilitating and leading this school climate improvement process.¹⁸

- District and school administrators, with support from school boards, can introduce and promote positive school climate awareness and improvements.
- Administrators can call attention to the importance of school climate at meetings, providing leadership for an inclusive team that will shape planning and facilitate implementation.
- Effective school principals, working with Title IX coordinators, can foster strong and supportive relationships among students and staff while working to integrate ongoing positive climate practices into school and classroom policies and practices.

A crucial component of building and implementing positive school climate is having the capacity to measure it. Assessing and evaluating a school's strengths and issues helps clarify the means to improving the school climate. In addition to measuring efforts that may already be underway in your school, such as PBIS, ED has released a comprehensive set of school climate planning tools, measures, and detailed surveys to aid schools in making improvements.

Clear policies. Clear policies let everyone in the educational community know what is expected and what will happen if incidents occur. Policies guide everyone in their response to an incident. School district policies can also shape school climate by encouraging the development of healthy relationships.

To be effective members of the team addressing these issues, Title IX coordinators must have knowledge of school policies and procedures on sex discrimination, discipline, bullying, sexual harassment, and sexual violence, and they should be involved in the drafting and revision of such policies and procedures to help ensure compliance with Title IX requirements. Coordinators work with schools to make sure all employees have the support they need to ensure consistent practices and enforcement of policies in keeping with Title IX compliance.¹⁹

Districts should adopt well-publicized policies prohibiting bullying and sexual harassment and violence as well as procedures for reporting and resolving complaints. Policies and procedures must also protect against retaliation. Students and staff should all receive training on these policies and procedures, and employees should be provided written copies. Policies should be spelled out in student handbooks and codes of conduct, using age-appropriate and easy-to-understand language.



To learn more about...

Implementing school climate improvements, see [Quick Guide on Making School Climate Improvements](#), AIR and NCSSE

Assessing school climate, see [School Climate Surveys](#), AIR and NCSSE



To learn more about...

Developing comprehensive policies addressing healthy relationships and abuse prevention, see [Framework for Developing School Policies to Address Domestic Violence, Dating Violence, Sexual Assault and Stalking](#), Break the Cycle

Developing sexual misconduct policies, see [Considerations for School District Sexual Misconduct Policies](#), White House Task Force to Protect Students from Sexual Assault

Healthy relationships. The foundation of preventing bullying and sexual harassment and violence is for students to learn what healthy relationships look like and how to have them. There are several approaches to take:

- Teach students what to avoid: Use evidence-based prevention curricula to teach students to identify and learn to avoid bullying, sexual harassment, and teen-dating violence.
- Teach students positive relationship skills: Integrate healthy relationship building and social-emotional skill development throughout the school environment for all students.
- Model positive adult relationships: Ensure that all staff and employees treat each other with respect.
- Promote healthy relationships: Build strong relationships between students as well as between teachers/staff and students.

Teachers and school staff play important roles in the lives of their students. Research demonstrates that children who overcome adversity of any kind and end up doing well have had at least one stable and committed relationship with a supportive parent, caregiver, or other adult. These relationships not only buffer children from harm, but also help them learn important abilities about how to adapt and respond to adversity and how to thrive. These children demonstrate enhanced resilience.²⁰

Many prevention and healthy relationship curricula are available, both for purchase as well as free. Implementation will be more effective and sustainable if evidence-based curricula are used and relationship-building strategies become embedded in all daily interactions in a school.



To learn more about...

The incidence and prevention of sexual violence, see [*Sexual Violence in Youth*](#), CDC

Peer-to-peer relationships, see [*Enhancing Peer-to-Peer Relationships to Strengthen School Climate*](#), AIR and NCSSLE

Supportive relationships, see [*Establishing Supportive Relationships Between Teachers, Staff, Students, and Families*](#), AIR and NCSSLE

Teen dating abuse prevention, see [*Get Smart, Get Help, Get Safe*](#), AIR and NCSSLE

Healthy relationships, see [*Healthy Relationships*](#), Office of Adolescent Health

Sexual violence prevention, see [*Sexual Violence: Prevention Strategies*](#), CDC

Intercede in Sexual Harassment and Violence

Step in; take charge. When adults respond quickly and consistently to bullying and sexual harassment and violence, they send a powerful message to students that these behaviors are not acceptable. Research shows that swift and consistent responses can help stop these behaviors over time.²¹ School staff need to be encouraged and trained to intercede appropriately when incidents occur. It also helps to have the support of a positive school climate and strong professional relationships within the educational community.

The federal government provides free resources through its website, stopbullying.gov, including these strategies for interceding with any type of incident:

- Step in immediately, even asking another adult to help.
- Separate involved students.
- Make sure everyone is safe.
- Stay calm and model respectful behavior.
- Support students who have been harassed or bullied.

Staff members need to follow the school's policies and procedures for handling incidents, but it is important not to blame the student who was harassed or bullied or to ever tell the student to just ignore the behavior or to fight back. It takes consistent, repeated effort to ensure that harassment and bullying stop. Following up on all incidents will thus demonstrate a commitment to ensuring an end to the aggressive behaviors.

Bystander intervention. Along with school staff, students can, and often want to, play a big role in stopping negative behaviors and improving school climate. The impact of harassment and bullying is well documented on those who are directly involved. Research also shows that witnessing other people being harmed constitutes one of a dozen specific types of trauma for which the negative effects are clearly substantiated.²²

The research tells us that teaching age-appropriate bystander intervention techniques can help prevent or stop incidents.²³ Very young students can learn how to set good examples, when and how to seek the help of adults in the school, and how to be a friend to children who are bullied. Middle school and high school students can learn these same skills in addition to safe ways to stand up if they see something happening. Training and supporting students in such techniques teaches them to be active rather than passive bystanders. This may not only have a powerful, positive effect on these students, but can also offer opportunities to address behaviors *before* bullying and sexual harassment and violence take place.²⁴ Instead of limiting

responses to a culminating “event,” bystander intervention views an “event” on a continuum of behaviors. The continuum ranges from, at one end, healthy, age-appropriate, respectful, and safe behaviors to bullying and sexual harassment and violence, at the other end.²⁵

There are a number of ways to teach bystander intervention, including high-quality, in-person skill-building curricula, social marketing campaigns, online resources, and staff training. Common components of effective bystander intervention tools should include:

- Creating awareness and a sense of responsibility,
- Changing perceptions of norms, and
- Building skills and confidence.

De-escalation. Situations may arise in which staff must try to de-escalate the behavior of a student who is out of control. Verbal de-escalation techniques are appropriate when no weapon is present. The first and only objective in de-escalation is to reduce the level of agitation so that discussion becomes possible.

De-escalation is a learned skill. The person responsible for managing the situation must learn to stay calm, even when others are not. Administrators should provide professional development opportunities for staff to learn these important skills, ongoing practice to make them second nature when needed, as well as ongoing training to maintain competency.



To learn more about...

Training activities for bystanders, see [*Engaging Bystanders in Sexual Violence Prevention*](#), National Sexual Violence Resource Center

Strategies for bystanders, see [*Stop Sexual Violence*](#) (a sexual violence bystander intervention toolkit), New York State Department of Health

Techniques to prevent bullying, see stopbullying.gov

Respond to Sexual Harassment and Violence

Safety plans. Schools typically develop emergency operations plans to respond to a variety of possible situations, such as severe weather or a shooting incident. In the context of sexual violence survivor support, safety plans are developed to address immediate safety needs while outlining strategies to help survivors avoid future harm. Schools should consider incorporating relevant aspects of these types of safety planning into existing emergency operations plans that outline the steps to take in response to incidents of bullying and sexual harassment and violence. Such plans can help staff respond appropriately and effectively to an incident as it occurs.

The key feature of safety planning in this context is to keep a student or students who have been bullied, harassed, or assaulted physically and emotionally safe, with clear guidance on steps to establish and maintain separation from those who have done the bullying, harassment, or assault. These plans would go hand-in-hand with policies and procedures that describe the appropriate school response to incidents. This should include safety considerations in the physical environment of the school and at school-related activities. It should also involve considering technology and the use of social media if incidents of cyberbullying or harassment occur.

Plans also outline steps that need to be taken to reestablish and maintain a safe learning environment. By having plans in place to keep students and staff safe, schools help prevent some crises from occurring and reduce the impact of a crisis by protecting students and staff.²⁶ The following steps are essential:

1. Evaluate the impact of bullying and sexual harassment and violence incidents on the individuals involved as well as on the whole school environment.
2. Assess the extent to which existing policies and procedures specifically address the staff member response to incidents and efforts at recovery.
3. Gather information about changes and improvements to policies and procedures that are needed to better handle incidents and recovery.
4. Make changes.
5. Share changes with the entire school and community, providing trainings as needed for staff and students.

When incidents do occur, it is essential to debrief everyone afterward and assess the way things were handled. The educational community can use the information to continually improve policies and procedures.

Appropriate consequences. School policies and procedures should clearly describe developmentally appropriate consequences for students who bully, sexually harass, or sexually assault another student. The policies and procedures should delineate steps in the investigative and reporting processes and specify the types of aggression for which incidents are reported to police. The school should also have clear procedures for notifying the harassed student and parent or guardian of the right to file a criminal complaint if the conduct constitutes criminal activity.



To learn more about...

Developing emergency operations plans, including how to balance safety and privacy concerns, see [*Guide for Developing High-Quality School Emergency Operations Plans*](#), ED

Addressing teen dating violence, including safety planning, see [*Building Safe Schools*](#), Break the Cycle

Model school policies, including safety accommodations, see [*Safe Schools Model Policy*](#), Break the Cycle

A school's Title IX obligation with regard to appropriate response is outlined in a previous section of this guide as well as in the Sexual Harassment Under Title IX training that is part of this resource package. Title IX obligations should be integrated with safety planning codes of conduct, policies, and procedures that, taken altogether, describe the process by which a school will quickly and effectively respond to incidents, including appropriate consequences.

All consequences and discipline actions should be clear and equitable for all students. Just as gender, ethnicity, and other issues may come into play in incidents of bullying and sexual harassment and violence, similar issues have been found to arise in discipline practices.²⁷ Exclusionary discipline practices in schools have been shown to disproportionately impact students of color; students with emotional, behavioral, and cognitive disabilities; and youth who identify as lesbian, gay, bisexual, transgender, and questioning.²⁸ Unequal numbers of these students are subject to exclusionary discipline practices that remove them from class, cost them opportunities to learn, and suspend or expel them from school.

The impact on students, families, schools, and the community of discriminatory discipline is serious and the cost is high. All students unfairly and disproportionately disciplined can become alienated from school and their teachers, putting them at higher and unnecessary risk of educational, economic, and social problems. Often these youth also have disproportionate rates of contact with the juvenile justice system, particularly when being arrested at school or referred by the school to law enforcement. Once initial contact with law enforcement has been made, this can lead to deeper involvement in the juvenile and criminal justice systems and reduce the likelihood that these youth will return to school or graduate.²⁹

Disparities in school discipline and the means of addressing them encompasses a large area of study that exceeds the scope of this resource. The U.S. Departments of Education and Justice, however, have issued detailed guidance on discipline, an essential resource offered with this package. Administrators should make every effort to ensure accountability while treating those who bully, harass, or assault a student or students fairly and without discrimination.

To learn more about...

Federal guidance on addressing disparities in discipline, see [*Addressing the Root Cause of Disparities in School Discipline*](#), AIR and NCSSLE

Developing responsive, fair, and equitable discipline policies, see [*Framework for Developing School Policies to Address Domestic Violence, Dating Violence, Sexual Assault and Stalking*](#), Break the Cycle

Developing equitable discipline policies, see [*Key Elements of Policies to Address Discipline Disproportionality*](#), PBIS

School climate and discipline, see [*ED-DOJ School Discipline Guidance Package*](#), ED

Trauma-sensitive supports. Whether incidents occur in school or off the school premises, staff members need to be trained in trauma-sensitive conduct and intervene with appropriate school-based mental health services. Any trauma can interfere with a student’s ability to learn in school. Trauma-sensitive schools have the potential to increase positive outcomes among all students, regardless of trauma history. Trauma-sensitive practices should be combined with policies and procedures that protect the safety of affected students.

Involvement of specialized instructional support personnel, such as school psychologists, counselors, nurses, and social workers, is crucial given that few preservice teacher preparation programs include components to help educators develop the skills and coping strategies needed to detect and teach traumatized students.³⁰

School-based mental health support takes a variety of forms:

1. On-site clinical services,
2. Positive behavior supports,
3. Social and emotional learning programs,
4. Efforts to foster student engagement, and
5. Strong and supportive relationships with teachers.

Schools can provide access to mental health services from on-site clinical staff or by partnering with community mental health organizations to accept referrals as needed. Although these supports and services may come into play in responding to incidents, trauma-sensitive practices and strong mental health supports will also help promote student social and emotional skills and contribute to a positive school climate.



To learn more about...

The effect of trauma on learning, see [*Helping Traumatized Children Learn*](#), Trauma and Learning Policy Initiative

Supporting students who are bullied, see [*Support the Kids Involved*](#), stopbullying.gov

Positive behavioral interventions and supports, see the [PBIS website](#)

Social and emotional learning, see the [Collaborative for Academic, Social, and Emotional Learning website](#)

Mental health in a school setting, see [*School-Based Supports*](#), youth.gov

References

1. U.S. Department of Education, Office for Civil Rights. *Dear colleague letter: Sexual violence*. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf>
2. American Institutes for Research, National Center on Safe Supportive Learning Environments. (2016). *School climate*. Retrieved from <https://safesupportivelearning.ed.gov/school-climate>
3. American Institutes for Research, National Center on Safe Supportive Learning Environments. (2016). *Quick guide on making school climate improvements*. Retrieved from <https://safesupportivelearning.ed.gov/scirp/quick-guide>
4. Presidential Task Force on Posttraumatic Stress Disorder and Trauma in Children and Adolescents (2008). *Children and trauma: Update for mental health Professionals*. Washington, DC: American Psychological Association. Retrieved from <http://www.apa.org/pi/families/resources/children-trauma-update.aspx>
5. Norris, F., & Slone, L. (2013). Understanding research on the epidemiology of trauma and PTSD. *PTSD Research Quarterly*, 24(2), 1–13.
6. Finkelhor, D., Turner, H. A., Shattuck, A., & Hamby, S. L. (2013). Violence, crime, and abuse exposure in a national sample of children and youth: An update. *JAMA Pediatrics*, 167(7), 614–621. doi:10.1001/jamapediatrics.2013.42
7. Centers for Disease Control and Prevention, Kaiser Permanente. [The ACE study survey data.] Unpublished data. Retrieved from <http://www.cdc.gov/violenceprevention/acestudy/about.html>
8. Felitti, V., Anda R. F., Nordenberg, D., Williamson, D. F., Spitz, A. M., Edwards, V., ... Marks, J. S. (1998). Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults. *American Journal of Preventive Medicine*, 14(4), 245–258.
9. Hanson, J. L., Chung, M. K., Avants, B. B., Shirlcliff, E., A., Gee, J. C., Davidson, R. J., & Pollak, S. D. (2010). Early stress is associated with alterations in the orbitofrontal cortex: A tensor-based morphometry investigation of brain structure and behavioral risk. *Journal of Neuroscience: The Official Journal of the Society for Neuroscience*, 30(22), 7466–7472. doi.org/10.1523/JNEUROSCI.0859-10.2010
10. Middlebrooks, J. S., & Audage, N. C. (2008). *The effects of childhood stress on health across the lifespan*. Atlanta, GA: Centers for Disease Control and Prevention, National Center for Injury Prevention and Control.
11. National Association of School Psychologists. (2015). *Creating trauma-sensitive schools: Supportive policies and practices for learning* [Research summary]. Bethesda, MD: Author. Retrieved from http://www.nasponline.org/Documents/Research%20and%20Policy/Research%20Center/Trauma_Sensitive_Schools_2015.pdf
12. U.S. Department of Education, Office for Civil Rights. (2015, April). *Title IX resource guide*. Washington, DC: Author. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/dcl-title-ix-coordinators-guide-201504.pdf>
13. U.S. Department of Education, Office for Civil Rights. (2015). *Dear colleague letter: Title IX coordinators*. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201504-title-ix-coordinators.pdf>
14. U.S. Department of Education, Office for Civil Rights. (2015, April). *Title IX resource guide*. Washington, DC: Author. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/dcl-title-ix-coordinators-guide-201504.pdf>
15. Osher, D., Fisher, D., Amos, L., Katz, J., Dwyer, K., Duffey, T., & Colombi, G. D. (2015). *Addressing the root causes of disparities in school discipline: An educator's action planning guide*. Washington, DC: American Institutes for Research, National Center on Safe Supportive Learning Environments. Retrieved from <https://safesupportivelearning.ed.gov/addressing-root-causes-disparities-school-discipline>

16. Break the Cycle. (n.d.). *Framework for developing school policies to address domestic violence, dating violence, sexual assault and stalking*. Retrieved from <http://www.breakthecycle.org/sites/default/files/Policy%20Guide%20FINAL%20.pdf>
17. U.S. Department of Education, Office for Civil Rights. (2015, April). *Title IX resource guide*. Washington, DC: Author. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/dcl-title-ix-coordinators-guide-201504.pdf>
18. American Institutes for Research, National Center on Safe Supportive Learning Environments. (2016). *School/district administrators*. Retrieved from <https://safesupportivelearning.ed.gov/training-technical-assistance/roles/schooldistrict-administrators>
19. U.S. Department of Education, Office for Civil Rights. (2015, April). *Title IX resource guide*. Washington, DC: Author. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/dcl-title-ix-coordinators-guide-201504.pdf>
20. National Scientific Council on the Developing Child. (2015). *Supportive relationships and active skill-building strengthen the foundations of resilience* [Working Paper 13]. Retrieved from <http://www.developingchild.harvard.edu>
21. Bradshaw, C., Waasdorp, T., O'Brennan, L., Gulemetova, M., & Henderson, R. (2011). *Findings from the National Education Association's nationwide study of bullying: Teachers' and education support professionals' perspectives*. Washington, DC: National Education Association. Retrieved from https://www.nea.org/assets/docs/2010_Survey.pdf
22. Norris, F., & Slone, L. (2013). Understanding research on the epidemiology of trauma and PTSD. *PTSD Research Quarterly*, 24(2), 1–13.
23. Karna, A., Voeten, M., Poskiparta, E., & Salmivalli, C. (2010). Vulnerable children in varying classroom contexts: Bystanders' behaviors moderate the effects of risk factors on victimization. *Merrill-Palmer Quarterly*, 56, 261–282. Retrieved from https://www.researchgate.net/publication/236698374_Vulnerable_Children_in_Varying_Classroom_Contexts_Bystanders'_Behaviors_Moderate_the_Effects_of_Risk_Factors_on_Victimization
24. U.S. Department of Education's Higher Education Center for Alcohol, Drug Abuse, and Violence Prevention. (2012). *Prevention update, bystander intervention*. Retrieved from https://safesupportivelearning.ed.gov/sites/default/files/sssta/20130315_july2012.pdf
25. Tabachnick, J. (2009). *Engaging bystanders in sexual violence prevention*. Retrieved from http://www.nsvrc.org/sites/default/files/Publications_NSVRC_Booklets_Engaging-Bystanders-in-Sexual-Violence-Prevention.pdf
26. U.S. Department of Education. (2013). *Guide for developing high-quality school emergency operations plans*. Retrieved from http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf
27. American Institutes for Research, National Center on Safe Supportive Learning Environments. (2015). *Addressing the root causes of disparities in school discipline*. Washington, DC: American Institutes for Research, National Center on Safe Supportive Learning Environments. Retrieved from <https://safesupportivelearning.ed.gov/addressing-root-causes-disparities-school-discipline>
28. U.S. Department of Education, Office for Civil Rights. (2014). *Civil rights data collection data snapshot: School discipline* (Issue Brief No. 1). Washington, DC: Author. Retrieved from <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-discipline-snapshot.pdf>
29. Ibid.
30. National Association of School Psychologists. (2015). *Research summaries: Creating trauma-sensitive schools: supportive policies and practices for learning*. Retrieved from https://www.nasponline.org/Documents/Research%20and%20Policy/Research%20Center/Trauma_Sensitive_Schools_2015.pdf

Safe Place
to Learn

