

COMMENT ON PROPOSED TITLE IX REGULATION

## Live Hearing and Cross-Examination

Submitted by SAVE

This Comment is to be included as part of the Administrative Record

ID Number: ED-2021-OCR-0166-0001

Date: August 24, 2022

The following groups, which now number more than 150, have gone on record in categorical opposition to the Department of Education's recently proposed Title IX regulation.<sup>1</sup> These organizations represent a diverse range of interests, areas of expertise, and geographical focus. Many of these groups have issued detailed statements of opposition, which can be viewed here: <https://www.saveservices.org/2022-policy/> :

Following is the list of the opposing groups:

- SAVE
- Alliance Defending Freedom
- American Association of Christian Schools (21):
  - Buckeye Christian School Organization
  - Christian Schools of Arizona
  - Christian Schools of Vermont
  - Delaware Association of Christian Schools
  - Golden State Association of Christian Schools
  - Illinois Association of Christian Schools
  - Indiana Association of Christian Schools
  - Maryland Association of Christian Schools
  - Michigan Association of Christian Schools
  - Mid-South Association of Christian Schools
  - Missouri Association of Christian Schools
  - New Mexico Association of Christian Schools
  - New York Association of Christian Schools
  - North Carolina Christian School Association
  - Northwest Association of Christian Schools
  - South Carolina Association of Christian Schools
  - Sunshine State Association of Christian Schools
  - Tennessee Association of Christian Schools
  - West Virginia Christian Education Association

---

<sup>1</sup> <https://www2.ed.gov/about/offices/list/ocr/docs/t9nprm.pdf>

- Wisconsin Association of Christian Schools
- American Family Association
- American Principles Project
- Center for American Liberty
- Child and Parental Rights Campaign
- Concerned Women for America
- Defense of Freedom Institute
- Eagle Forum (8):
  - Alabama Eagle Forum
  - California Eagle Forum
  - Tennessee Eagle Forum
  - Texas Eagle Forum
  - Utah Eagle Forum
  - Virginia Eagle Forum
  - Washington Eagle Forum
- Ethics and Public Policy Center
- Families Advocating for Campus Equality
- Family Policy Alliance
- Family Research Council
- First Liberty Institute
- Focus on the Family
- Heritage Action
- Heritage Foundation
- Independent Women's Forum
- Mission America
- National Association of Scholars
- National Faith Advisory Board
- New Civil Liberties Alliance
- Parents Defending Education
- Title IX for All
- U.S. Conference of Catholic Bishops
- Free Speech Organizations (3):
  - Foundation for Individual Rights and Expression
  - Podcast: Title IX Gets Twisted Again
  - Speech First
  - Princetonians for Free Speech

**Other National Groups (42):** 60 Plus Association; Advancing American Freedom; Alexander Hamilton Institute; ACRU Action; American Council for Health Care; Americans for Limited Government; Center for Equal Opportunity; Center for Military Readiness; Center for Urban

Renewal and Education; Child Protection League; Children First Foundation; Citizens for Renewing America; Coalition for a Fair Judiciary; ConservativeHQ; Conservative Political Action Conference; Dr. James Dobson Family Institute; Equality for Boys and Men; FAIR Energy Foundation; Firebrand Moms; ForAmerica; Learn to Protect Kids; Less Government; Men and Women for a Representative Democracy; Moms for America; No Left Turn in Education; Project 21; Radiance Foundation; Recover America Action; Reaching America; Rule of Law Committee; Save Our States; Strategic Coalitions & Initiatives; Tea Party Nation; Tenpenny Alliance; The Conservative Caucus; United Families International; Vietnamese American Conservative Alliance; Voices Against Trafficking; Washington Marketing Group; and Women for Democracy in America.

**State-Level Groups (25):**

- Arizona:
  - 4Tucson
  - Center for Arizona Policy
  - Grand Young Party
  - Southwest Policy Group
- California:
  - California Association of Scholars
- Connecticut:
  - Greenwich Patriots
- Delaware:
  - Caesar Rodney Institute
  - Delaware Family Policy Council
- Florida:
  - Palm Beach Freedom Institute
- Georgia:
  - Frontline Policy Council
- Idaho:
  - Idaho Freedom Foundation's Center for American Education
- Louisiana:
  - Louisiana Family Forum
  - Louisiana Save Our Schools
- Maine:
  - Christian Civic League of Maine
- Maryland:
  - United Against Racism in Education
- North Dakota:
  - North Dakota Family Alliance
  - Roughrider Policy Center

- Ohio:
  - Ohio Freedom Fighters
  - Ohio Value Voters
  - Protect Ohio Children Coalition
- Oklahoma:
  - Oklahoma Council of Public Affairs
- Oregon:
  - Cascade Policy Institute
- Rhode Island:
  - Rhode Island Center for Freedom and Prosperity
- South Carolina:
  - Richland County Moms For Liberty
- Tennessee:
  - Family Action Council of Tennessee
  - Tennessee Moms for Liberty
- Texas:
  - MassResistance.org
  - Secure the Border, LLC
- Virginia:
  - Middle Resolution Policy Network
  - Moms for Liberty, Campbell County
  - Moms for Liberty, York County
  - Parents Against Critical Theory
- Wyoming:
  - Family Policy Alliance of Wyoming

**Religious Groups (14):** American Association of Evangelicals; America’s Black Robe Regiment; Association of Christian Schools International; Catholics Count; Coalition of African American Pastors; Coalition of Conservative Christian Colleges; Conservatives of Faith; FamilyFellowship.com; Give Him 15; Institute on Religion and Democracy; Katartismos Global; Schindler’s Ark; Maranatha House Ministries; Tradition, Family, Property, Inc.; and Well Versed.

**Title IX Law Firms (15):** Agee, Owens & Cooper, LLC; Albeit Weiker, LLP; Binnall Law Group; Bucci Law; Friedman & Nemecek, LLC; Jackson Bone LLP; Jauregui Law Firm; Law Offices of Barry S. Jacobson; Law Offices of Scott J. Limmer; Nesenoff & Miltenberg LLP; Rosenberg & Ball Co., LPA; Rupp Baase Pfalzgraf Cunningham LLC; Sammons Law; Tin Fulton Walker & Owen; and West, Webb, Allbritton & Gentry, P.C.