

**U.S. DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS  
ATLANTA OFFICE  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8909  
FAX #404-562-7881**

**ADMINISTRATIVE COMPLAINT**

**COMPLAINANT**

Ms. Mikelia Seals  


Mikelia Seals (“Mikelia”) is currently a student at Washington-Wilkes Comprehensive High School (“WWCHS”), which is part of Wilkes County Schools (“WCS”) in Atlanta, Georgia. Mikelia was enrolled at WWCHS beginning in August 2010 and was on track to graduate with her high school diploma in May 2015. During the Spring semester of 2014, Mikelia experienced pregnancy discrimination when WWCHS: (1) refused to provide her with homebound instruction despite Mikelia’s eligibility due to her medical necessity to be on best rest for the remainder of her pregnancy; (2) failed to excuse her absences due to her pregnancy and childbirth, including failing to excuse a medically necessary period to recover from an emergency cesarean delivery; and (3) refused to give Mikelia credit for work she completed in Spring 2014 both at school and during her absences. Additionally, WWCHS and WCS maintain policies and practices that discriminate against pregnant and parenting students in violation of Title IX.

**COMPLAINANT’S COUNSEL**

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**RECIPIENTS**

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## PRELIMINARY STATEMENT

1. Complainant Mikelia Seals brings this Complaint pursuant to Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.* (“Title IX”), and the regulations and policies promulgated thereunder. *See* 34 C.F.R. § 106 *et seq.* Title IX prohibits discrimination on the basis of sex, including pregnancy discrimination, in federally funded education programs and activities.
2. WCS and WWCHS maintain policies and practices that discriminate based on pregnancy and penalize students for pregnancy-related absences in violation of Title IX.
3. As detailed in the Factual and Legal Allegations below, during the Spring semester of 2014, Mikelia was subjected to pregnancy discrimination when WWCHS: (1) refused to provide her with homebound instruction despite Mikelia’s eligibility due to her medical necessity to be on best rest for the remainder of her pregnancy; (2) failed to excuse her absences due to her pregnancy and childbirth, including failing to excuse a medically necessary period to recover from an emergency cesarean delivery; and (3) refused to give Mikelia credit for work she completed in Spring 2014 both at school and during her absences. These acts of pregnancy discrimination caused Mikelia harm and resulted in her being denied the opportunity to continue her high school education at WWCHS.
4. The Wilkes County Board of Education (“WCBOE”) maintains a policy for pregnant students with the negative presumption that pregnant students will not want to continue attending school or make up missed schoolwork. First, the policy requires pregnant and parenting students to prove, with a doctor’s note, that they are able to continue attending school. Second, the policy provides that the principal of the school will notify the student and her doctor when the principal believes the nature of school activities has become hazardous to the student’s health, which assumes the principal can second guess the medical judgment of the student’s doctor. This policy not only burdens pregnant and parenting students, it also violates Title IX if the same is not required of all students with medical conditions requiring the treatment of a doctor.
5. Additionally, it appears that WCS and WWCHS have not adopted or disseminated a grievance procedure for the investigation and resolution of Title IX complaints, including complaints of discrimination based on pregnancy or parental status.
6. By way of background, in 2008, NWLC notified WCS and WWCHS that it violated Title IX by prohibiting pregnant students from participating in extracurricular activities, denying excused absences for students recovering from childbirth, and preventing eligible pregnant or parenting students from accessing “Hospital Homebound Instruction” services. At that time, NWLC represented multiple students who were harmed by WWCHS’ practices and sent a demand letter on behalf of those students to notify the district that its policies and practices violated Title IX. *See* Letter of May 27, 2008 from NWLC to WCS, WWCHS, and WCBOE, attached as Exhibit A. In response, WCS said it was revising its policies and practices, but it would not agree to a written resolution agreement, and no OCR complaint was filed.

7. Also in 2008, NWLC notified the Georgia Department of Education that the hospital homebound instruction ineligibility was a state-wide Georgia Department of Education rule. NWLC successfully persuaded the Georgia Department of Education to revise its Hospital Homebound Instruction rule so that on the books, pregnant students would no longer be considered ineligible for such instruction in violation of Title IX. The current rule, revised through a notice-and-comment rulemaking process in 2009, provides: “Students with absences due to pregnancy; related medical conditions, services, or treatment; childbirth; and recovery therefrom are eligible for HHB services for a length of time . . . provided that they satisfy the eligibility requirements.” *See* Ga. Comp. R. & Regs. 160-4-2-.31(2)(a)(2) (2009); Ga. Comp. R. & Regs. 160-4-2-.31(4)(c) (2009). Letter of September 30, 2009 from NWLC to the Georgia Department of Education commenting on the proposed rule change, attached at Exhibit B.
8. NWLC recently learned that pregnant students at WWCHS are still being discriminated against, Mikelia’s case being just one example.
9. In order to address this continued violation of Title IX and Georgia Department of Education rules, Mikelia requests that the Atlanta Office for Civil Rights (“OCR”) investigate WWCHS, WCS, and WCBOE to determine whether they are violating Title IX, take all necessary steps to remedy any unlawful conduct, and provide individual relief for Mikelia.

### **JURISDICTION AND VENUE**

10. OCR is responsible for ensuring compliance with Title IX and receiving information about, investigating, and remedying violations of Title IX and its implementing regulations and guidelines. 34 C.F.R. §§ 106.71, 100.7.
11. Wilkes County Schools is a public school district receiving federal financial assistance and is therefore prohibited from discriminating on the basis of sex by Title IX.
12. This complaint is timely. WWCHS denied Mikelia access to homebound instruction services on or about February 20, 2014, after she had received instructions from her doctor to stay on bed rest until giving birth. Mikelia continued her studies to the best of her abilities.
13. In March 2014, Mikelia went to WWCHS to take a mandatory graduation exam. While at school for the exam, Mikelia saw Principal Mark Ward, who told her that none of the work she had done since being denied homebound instruction would “count” for credit.
14. On March 28, 2014, WWCHS sent a letter informing Mikelia that she exceeded the permitted number of unexcused absences for the year and would not receive credit for her coursework. A copy of this letter is attached as Exhibit C.

15. Mikelia never received a report card for Spring semester 2014, and as of June 30, 2014 there was no record of her enrollment at WWCHS on the school's registration and enrollment website.
16. On July 22, 2014, Mikelia spoke with Principal Ward by phone and he confirmed that she was denied hospital homebound instruction because she was pregnant and WWCHS does not consider pregnancy to be an eligible condition.
17. Mikelia files this complaint on July 24, 2014, less than 180 days from these violations of Title IX.
18. In any case, because WWCHS continues to maintain a policy and practice that enables pregnancy discrimination, this complaint is timely. WWCHS's policy and practice of refusing to excuse absences related to pregnancy or allow for make-up work for pregnancy-related absences violates Title IX and its implementing regulations, as does its policy and practice of denying pregnant and parenting students hospital homebound instruction. 20 U.S.C. § 1681 *et seq.*; 34 C.F.R. §§ 106.40(b)(5) and 106.40(b)(4).

### **FACTUAL ALLEGATIONS**

#### **Mikelia Seals was a Student at WWCHS**

19. Mikelia Seals was a full-time student at WWCHS beginning in August 2010 and was scheduled to graduate in May 2015. In Fall semester 2013, she became pregnant, and during Spring semester 2014 she experienced pregnancy complications. At the beginning of Spring semester 2014, she was a junior enrolled in Math, Chemistry, Early Childhood, and American Government. In order to graduate with her high school diploma, Mikelia will need to complete the Spring semester of 2014 as well as two additional semesters of coursework.

#### **Mikelia's Pregnancy, Bed Rest, and Emergency Cesarean Delivery, and WWCHS's Treatment of Her in Violation of Title IX**

20. On or about February 19, 2014, when Mikelia was approximately seven months pregnant, Mikelia's doctor ordered her on bed rest due to several pregnancy complications, including her inability to eat without vomiting, severe back pain, and early contractions. Due to her early contractions, Mikelia was at risk of premature delivery.
21. On or about February 20, 2014, Mikelia and her mother met with her counselor Don Bridges ("Mr. Bridges") and gave him the note from her doctor explaining that she was being put on medically necessary bed rest. Mr. Bridges made a photocopy of the note.
22. After giving Mr. Bridges her doctor's note, Mikelia asked Mr. Bridges if she could get homebound instruction during her period of bed rest. Mr. Bridges said that WWCHS no longer provides students with hospital homebound instruction service and did not provide Mikelia with the requisite forms for enrolling in homebound instruction. Mr. Bridges

told Mikelia to email her teachers for her coursework for the days she would be out of school.

23. WWCHS currently offers homebound instruction to students with medical conditions causing them to miss several days of school in a row, despite Mr. Bridges' denial of Mikelia's request. *See* Student Handbook Policy regarding hospital homebound instruction, attached as Exhibit D.
24. At no point during the conversation did Mr. Bridges tell Mikelia that she was at risk for not receiving credit for the work she had completed up to that point or would complete while on bed rest. Mr. Bridges did tell Mikelia that she had to attend school prior to her due date to take a required graduation exam.
25. Despite being denied homebound instruction services by Mr. Bridges, Mikelia corresponded with many of her teachers to continue her studies to the best of her abilities.
26. In response to Mr. Bridges' directive, Mikelia went to WWCHS to take the graduation exam despite her doctor's orders that she stay on bed rest. While at WWCHS that day, Mikelia picked up new work from her teachers in order to continue working from home.
27. After taking the graduation exam and picking up work from her teachers, Mikelia was waiting in WWCHS's front office for her mother to pick her up. Principal Mark Ward ("Principal Ward") came into the office and asked Mikelia where she had been recently. When Mikelia explained that she was on bed rest but came in to school that day in order to take the graduation exam, Principal Ward told her that none of the work she had been doing while she was out would count for credit towards her courses. This meant that she would not receive any course credit for the semester. Two WWCHS administrators, Ms. Erica Fabors and Ms. Winnie Martin, were present during this conversation. Once she learned that she would not get any credit for her efforts, Mikelia felt like her efforts were futile, so she stopped doing school work from home.
28. On March 28, 2014, WWCHS sent Mikelia a letter notifying her that she had exceeded the number of unexcused absences permitted for the semester. The letter informed Mikelia that she would not receive credit for the courses in which she had exceeded the number of permitted unexcused absences. The letter was signed by Principal Ward. *See* Exhibit C.
29. On April 7, 2014, Mikelia went into labor. Due to a complication in her delivery, Mikelia had to give birth via emergency cesarean delivery.
30. After giving birth on April 8, 2014, Mikelia's doctor informed her that the standard recovery period after an emergency cesarean delivery is at least six weeks and that Mikelia would need at least that much time to medically recover from the procedure. While she was still in the hospital, Ms. Fabors sent Mikelia a private message on Facebook congratulating her on her delivery.

31. On July 22, 2014, Mikelia called Principal Ward to discuss returning to WWCHS for the Fall semester, which begins on August 7, 2014. Contrary to what Mr. Bridges had told Mikelia when she first asked for hospital homebound instruction, Principal Ward confirmed that WWCHS does provide such services. When Mikelia asked Principal Ward why Mr. Bridges told her that WWCHS does not provide homebound instruction, Principal Ward said that pregnancy is not a medical condition and does not qualify for homebound instruction.
32. Also during their phone conversation on July 22, 2014, Principal Ward told Mikelia that in order to earn enough credits to graduate, she must repeat her Spring semester courses, which will delay her high school graduation and require her to stay at WWCHS for an extra semester.

*WWCHS and WCS Penalized Mikelia Because of Her Pregnancy and Related Medical Conditions, in Violation of Title IX.*

33. The Spring 2014 semester at WWCHS began on January 3, 2014 and ended on May 23, 2014. Due to the medically necessary six-week recovery period, Mr. Bridges' refusal to enroll Mikelia in the hospital homebound instruction services, the school's refusal to excuse her absences, and Principal Ward's statement that none of the work Mikelia was doing from home would count, Mikelia was unable to return to WWCHS before the semester ended and was unable to complete her coursework while she was out.
34. WWCHS uses a website called PowerSchool on which students and parents can log on to see the student's enrollment, current and past grades, attendance, and registration. As of June 30, 2014, Mikelia's PowerSchool page contained no record of her enrollment in the Spring 2014 semester or her grades for that semester. Copies of the screen shots of Mikelia's page are attached as Exhibit E.
35. As of July 7, 2014, Mikelia no longer has access to her account information on PowerSchool, as her account has been disabled. A copy of the screen shot of the disabled account notification is attached as Exhibit F.
36. While other WWCHS students received their report cards in the mail for the Spring 2014 semester, Mikelia did not receive a report card for the Spring 2014 semester.

*WWCHS's Policies Do Not Comply with Title IX and its Regulations*

37. **WWCHS's Student Handbook** provides for the following nine categories of excused absences:
  - a. Personal illness/doctor's appointment;
  - b. Personal illness or attendance in school endangers the student's health or the health of others;
  - c. Death or serious illness in immediate family;
  - d. Religious holiday;
  - e. Governmental mandate (subpoena to court);

- f. Serving as a congressional page;
- g. Family being deployed or returning from military service;
- h. Registering to vote; and
- i. Other reasons as outlined in the Wilkes County Attendance Protocol.

*See Exhibit D.*

38. WCS's **Wilkes County Attendance Protocol** provides for the following six categories of excused absences:

- a. Personal illness or attendance in school that endangers a student's health or the health of others;
- b. A serious illness or death in a student's immediate family necessitating absence from school;
- c. A court order or an order by a governmental agency, including pre-induction physical examinations for service in the armed forces, mandating absence from school;
- d. The observance of religious holidays, necessitating absence from school;
- e. Conditions rendering attendance impossible or hazardous to student health or safety; and
- f. A student whose parent is in military service in the armed forces of the United States or the National Guard, and such parent has been called to duty for or is on leave from overseas deployment to a combat zone or combat support posting, shall be granted excused absences up to a maximum of five school days per school year to visit with his or her parent prior to such parent's deployment or during such parent's leave.

A copy of this protocol is attached as Exhibit G.

39. WCS's **Board of Education Policy for Pregnant/Married/Unwed Parents** contains several requirements and protocols regarding pregnant students. Some of those requirements and protocols are:

- a. "Pregnant students are asked to notify their guidance counselor, homeroom teacher or administrator as soon as the condition has been established;"
- b. "If the pregnant student wishes to remain in school, approval from the student's doctor must be obtained. The doctor's statement should advise that attendance at school and participation in the regular school program will have no adverse effects on the student's health. When the condition of pregnancy reaches a state of development where the nature of school activities is considered to be hazardous to the student's health and welfare, and, after a conference with the student's guidance counselor, the principal will notify in writing the student and her doctor of this situation. The responsibility for her continuance in school will then rest with the student and her doctor;" and
- c. "Hospital homebound (HHB) will be provided for pregnancies if doctor requests HHB Services be provided for a period beyond the ten-day absence period. These details must be worked out through the school administration on a case-by-case basis."

A copy of this policy is attached as Exhibit H.

40. The Wilkes County Board of Education policy for pregnant students starts with the negative presumption that pregnant students will not want to continue attending school or make up missed schoolwork, by requiring pregnant and parenting students to prove, with a doctor's note, that they are able to continue attending school. The policy also provides that the principal of the school will notify the student and her doctor when the principal believes the nature of school activities has become hazardous to the student's health, which assumes the principal can make such a medical judgment. This policy not only burdens pregnant and parenting students but also violates Title IX if the same is not required of all students with medical conditions requiring the treatment of a doctor.
41. Furthermore, Mr. Bridges told Mikelia that hospital homebound instruction was not available at WWCHS even though Principal Ward confirmed that such services are available to students with other medical conditions. *See supra* paragraphs 22 and 31.

#### WWCHS's Ongoing Mistreatment of Other Pregnant and Parenting Students

42. Mikelia is aware of at least one other student who suffered similar adverse treatment due to pregnancy-related absences during the 2013-2014 academic year. This student gave birth in January 2014 and, upon information and belief, WWCHS unilaterally disenrolled her from school despite her desire to stay in school.
43. Additionally, WCS and WWCHS discriminated against pregnant students back in 2008, when NWLC represented pregnant and parenting students at WWCHS who were denied excused absences for pregnancy or recovery from childbirth, were denied homebound instruction services, and were denied the opportunity to participate in certain class honors and activities. *See Exhibit A.*

#### Additional Ongoing Violations of Title IX Requirements

44. To NWLC's knowledge, WWCHS, WCS, and WCBOE have not adopted or published a grievance procedure for students to file Title IX complaints, including complaints of discrimination based on pregnancy or parental status. Students and parents have not been informed of a policy for the investigation and evaluation of complaints or their prompt and equitable resolution.
45. WCS and WCBOE have designated Coach Robby Robinson as the district's "Athletic Director/Title IX Sports Equity Coordinator," but they have not, to NWLC's knowledge, communicated to the district that Coach Robinson is responsible for overseeing Title IX compliance in areas outside of athletics.

#### The Discrimination's Impact on Mikelia

46. The pregnancy discrimination has set Mikelia a semester behind her scheduled



graduation date. Mikelia wishes to become a Registered Nurse following high school graduation. As a result of the discrimination, her plans to attend Athens Technical College in Athens, Georgia may be harmed.

47. The pregnancy discrimination has taken a significant toll on Mikelia. As a result of the discrimination she suffered, Mikelia has felt upset, dejected, and frustrated; she fears that she will not be able to graduate high school by Spring 2015 as originally planned, if at all. As a new mother, these concerns weigh heavily on her. She is worried that she will not be allowed to complete her high school education despite her best efforts to do so, which will affect her ability to get a job and earn enough money to support herself and her child.

### **LEGAL ALLEGATIONS**

48. As outlined in the Factual Allegations above, WWCHS failed to comply with Title IX and its implementing regulations regarding pregnant and parenting students.

49. Title IX provides in relevant part that:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

20 U.S.C. § 1681(a).

50. Title IX's implementing regulations make clear that,

- a. “[a] recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom in the same manner and under the same policies as any other temporary disability with respect to any medical or hospital benefit, service, plan or policy which such recipient administers, operates, offers, or participates in with respect to students admitted to the recipient’s educational program or activity;” 34 C.F.R. § 106.40(b)(4);
- b. “[i]n the case of a recipient which does not maintain a leave policy for its students...a recipient shall treat pregnancy...as a justification for a leave of absence for so long a period as is deemed medically necessary by the student’s physician, at the conclusion of which the student shall be reinstated to the status which she held when the leave began;” 34 C.F.R. § 106.40(b)(5); and
- c. “[a] recipient may require such a student to obtain the certification of a physician that the student is physically and emotionally able to continue participation so long as such a certification is required of all students for other physical or emotional conditions requiring the attention of a physician;” 34 C.F.R. § 106.40(b)(2).

The regulations further provide other requirements to ensure the equitable treatment of pregnant and parenting students.

51. On June 25, 2013, the Department of Education issued updated guidance for schools regarding the application of Title IX to pregnant and parenting students, in the form of a Dear Colleague Letter (available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201306-title-ix.pdf>) and accompanying Pamphlet (available at <http://www2.ed.gov/about/offices/list/ocr/docs/pregnancy.pdf>) explaining the regulations and answering Frequently Asked Questions regarding their interpretation (“PPS Guidance”).
52. As the PPS Guidance explains:
  - a. “Title IX requires a school to excuse a student’s absences due to pregnancy or related conditions, including recovery from childbirth, *for as long as the student’s doctor deems the absences to be medically necessary*. When the student returns to school, she must be reinstated to the status she held when the leave began, *which should include giving her the opportunity to make up any work missed*. A school may offer the student alternatives to making up missed work, such as retaking a semester, taking part in an online course credit recovery program, or allowing the student additional time in a program to continue at the same pace and finish at a later date, especially after longer periods of leave. The student should be allowed to choose how to make up the work.” PPS Guidance, at 10 (emphasis added).
  - b. “In addition, a school must excuse a student’s absences because of pregnancy or childbirth for as long as the student’s doctor deems the absences medically necessary. When a student returns to school, she must be allowed to return to the same academic and extracurricular status as before her medical leave began. Any special services provided to students who have temporary medical conditions must also be provided to a pregnant student. Therefore, *if a school provides special services, such as homebound instruction or tutoring, for students who miss school because they have a temporary medical condition, it must do the same for a student who misses school because of pregnancy or childbirth*.” PPS Guidance, at 5-6 (emphasis added).
  - c. “To ensure a pregnant student’s access to its educational program, when necessary, a school must make adjustments to the regular program that are reasonable and responsive to the student’s temporary pregnancy status.” PPS Guidance, at 9.
  - d. “School districts must adopt and publish grievance procedures for students to file complaints of sex discrimination, including discrimination related to pregnancy or parental status. The grievance process should provide a mechanism for school

districts to investigate and evaluate complaints and must provide for prompt and equitable resolution of complaints. School districts should make sure that their grievance procedures are widely distributed and understandable by students, parents, and employees. A school district must also designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under the law. The coordinator's responsibilities include overseeing all Title IX complaints, including those alleging discrimination against pregnant and parenting students, and identifying and addressing any patterns or systemic problems that arise during the review of such complaints." PPS Guidance, at 10-11.

The PPS Guidance provides further instructions and guidelines to ensure the equitable treatment of pregnant and parenting students.

53. WCS and WWCHS violated Title IX's prohibition against pregnancy discrimination by:

- a. Maintaining a policy and practice of treating pregnancy-related absences as unexcused without any regard for federal civil rights law;
- b. Denying pregnant and parenting students the opportunity to enroll in homebound instruction while offering that same opportunity to students with other temporary medical conditions, which also violates Georgia Department of Education Rule 160-4-2-.31;
- c. Maintaining a policy with a negative presumption that pregnant students cannot and will not continue attending school or keep up with/make up their schoolwork, including allowing the Principal to decide at what point in the student's pregnancy it is no longer safe for her to continue attending school;
- d. Not excusing Mikelia's medically necessary absences;
- e. Denying Mikelia homebound instruction despite her eligibility for homebound instruction;
- f. Discouraging Mikelia from continuing her studies while she was on bed rest and recovering from childbirth by telling her that that work would not "count" for credit;
- g. Not giving Mikelia credit for the work she did in Spring 2014, including the work she completed prior to going out on bed rest and during the period of time she was working from home while she was on bed rest; and
- h. Not allowing Mikelia to make up the work she missed, for full credit, while she was on bed rest and recovering from childbirth.

## **RELIEF REQUESTED**

54. Mikelia Seals respectfully requests that OCR:

- a. Investigate WCS and WWCHS to determine whether they are allowing discrimination on the basis of sex under their education programs and activities.
- b. Secure an assurance of compliance with Title IX from WCS and WWCHS if any violations are found, as well as full remedies for the violations found. *See* U.S. Department of Education, Office for Civil Rights, OCR Case Processing Manual § 304 (Jan. 2010), *available at*: <http://www.ed.gov/> (setting forth guidelines for resolution agreements).
- c. Take all necessary steps to remedy any unlawful conduct identified in its investigation or otherwise on the part of WWCHS, as required by Title IX and its implementing regulations. 34 C.F.R. § 106.3(a).
- d. Require WCS and WWCHS to adopt a policy regarding its obligations to pregnant and parenting students that would bring WCS and WWCHS into compliance with Title IX, to disseminate that policy to all staff and students, and to train teachers, faculty, and administrators on WCS and WWCHS's obligations under Title IX and under the Georgia Department of Education's Hospital Homebound Instruction rule.
- e. Require WCS and WWCHS to allow Mikelia to return to school without penalty;
- f. Require WCS and WWCHS to remove from Mikelia's transcript and school record any failing grades she received and correct any other adverse actions, such as disciplinary action, that may have been taken against Mikelia for her pregnancy-related absences.
- g. Work with Mikelia to craft a reasonable and individualized plan to complete her Spring 2014 semester course work that gives her reasonable time to do so and assistance as needed, with the goal of helping Mikelia to graduate at the end of the Spring 2015 semester.
- h. Require WCS and WWCHS to reimburse Mikelia for any quantifiable costs she has had to bear as a result of WWCHS's discriminatory treatment.
- i. Monitor any resulting agreements with WCS and WWCHS to ensure that compliance with Title IX is achieved, as well as compliance with WCS' own policy on hospital homebound instruction for pregnant and parenting students.
- j. Finally, Mikelia has incurred legal fees in an effort to resolve this matter. The National Women's Law Center is a non-profit organization that has taken on representation of Mikelia *pro bono* and has spent a significant amount of time

working on this matter. The National Women's Law Center has complete documentation of its time spent and expenses, and will make them available to OCR upon request.

Respectfully submitted,

Counsel for Mikelia Seals



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