



OFFICE OF EQUITY ASSURANCE

Steven R. Alfred, Director Fair Practices and Title IX Coordinator

14201 School Lane | Upper Marlboro, MD 20772 | 301-952-6156 | equity@pgcps.org

July 20, 2026

Submitted via email to: Wendy.Gatlin@ed.gov and Vahn.Wagner@ed.gov

Wendy Gatlin

Compliance Team Leader/FOIA Coordinator

Office for Civil Rights

U.S. Department of Education

Vahn Wagner

Senior Attorney

Office for Civil Rights

U.S. Department of Education

Re: Prince George's County Public Schools – Office for Civil Rights Case No. 03-26-1260

Dear Ms. Gatlin and Mr. Wagner,

This correspondence serves as the formal acknowledgment by Prince George's County Public Schools (the District) of the Office for Civil Rights (OCR) opening letter dated June 23, 2026, regarding a complaint filed by the Defense of Freedom Institute for Policy Studies.

The District notes that OCR is opening an investigation into whether the District is in compliance with Title IX of the Education Amendments of 1972 (20 U.S.C. §§ 1681 et seq.) and its implementing regulation at 34 C.F.R. Part 106, specifically concerning policies and practices regarding student access to intimate facilities, overnight accommodations, and athletic programming.

The District takes its obligations under Title IX seriously and welcomes the opportunity to cooperate fully with OCR as a neutral factfinder. To facilitate a prompt and thorough investigation, the District provides the following preliminary requested information:

1. The name, title, and contact information for the individual who will serve as the District's contact person for this complaint.

The following individual serves as the District's primary legal and administrative contact for this complaint:

District Response:

- Name & Title: Darnell L. Henderson, Esq. General Counsel (District's legal contact)
- Name & Title: Steven R. Alfred, Director of Fair Practices (District's administrative contact)

- Office: Office of General Counsel/ Office of Equity Assurance
- Email: darnell.henderson@pgcp.org and steven.alfred@pgcps.org
- Phone: 301-952-6156

2. A copy of the current Board's Policies, District's Administrative Procedures, and guidance on permitting or prohibiting male students' use of intimate facilities, such as restrooms and locker rooms designated for use by female students. Please also provide the link(s) to the District's website where these documents may be found, or if not online, their publication locations.

Student use of intimate facilities is governed by the following District Administrative Procedures:

District Response:

- [Administrative Procedure 0103 – Transgender and Gender Diverse](#), (*see Exhibit I*)
- [Administrative Procedure 0104 – Title IX, Discrimination and Harassment on the Basis of Sex](#) (*see Exhibit II*)
- [Board Policy 0102 - Culturally Proficient Schools and Central Offices](#) (*see Exhibit III*)
- [Board Policy 0103 - Inclusive Environments for LGBTQIA+ People](#) (*see Exhibit IV*)
- [Board Policy 0104 - Title IX](#) (*see Exhibit V*)
- [Administrative Procedure 6153 - Student Field Trips, Day, Overnight or Virtual](#) (*see Exhibit VI*)
- [PGCPS Athletic Handbook](#), (*see Exhibit VII*)
- [Board Policy 0118 – Mission, Vision, and Core Values](#) (*see Exhibit VIII*)
- [Board Policy 0125 - Nondiscrimination](#) (*see Exhibit IX*)
- These documents are linked and can be publicly accessed on the District's website at: [PGCPS.org](https://pgcps.org)

3. A copy of the District's current policies, procedures, and guidance on permitting or prohibiting male students' participation in athletic teams and programs designated for female students. Please also provide the link(s) to the District's website where these documents may be found, or if not online, their publication locations.

District Response:

Student participation in athletic programs is governed by the Code of Maryland Regulations (COMAR - 13a.06.03), District athletic policies, and systemic administrative procedures:

- State Governance: Prince George's County Public Schools Interscholastic Athletics is governed by the Maryland Public Secondary Schools Athletic Association (MPSSAA) pursuant to the Code of Maryland Regulations 13a.06.03. Section A (page 22) of the 2025-2026 [MPSSAA Handbook](#) (*see Exhibit X*) establishes that students may not be excluded on the basis of sex from overall equal opportunity to participate in athletic programs. It outlines specific tryout protocols for an excluded sex if a school sponsors a team for one sex but not the other.
- District Handbooks: Page 12 of the 2025-2026 [PGCPS Athletic Handbook](#) (*see Exhibit VII*) explicitly itemizes all interscholastic sports teams alongside their designated genders. Both the MPSSAA and the

District Athletic Handbooks are publicly available under the "Athletics Handbooks" tab on the District Athletics homepage.

- Administrative Procedures: Section M (page 12) of [Administrative Procedure 0103](#) (*see Exhibit I*) outlines the protocols for permitting students to participate on interscholastic athletic teams that align with their gender identity. This is supported by the frameworks established in [Administrative Procedure 0103](#) (Transgender and Gender Diverse) (*see Exhibit I*) and [Administrative Procedure 0104](#) (Title IX, Discrimination and Harassment on the Basis of Sex) (*see Exhibit II*).
- Online Location: These procedures and handbooks are publicly accessible via the District's primary web portal at: [PGCPS.org](#) and the dedicated [PGCPS Athletics homepage](#) (*see Exhibit VII*).

4. A copy of the District's current policies, procedures, and guidance on permitting or prohibiting male students to share overnight accommodations with female students. Please also provide the link(s) to the District's website where these documents may be found, or if not online, their publication locations.

Student placement and privacy protections during overnight accommodations are governed by:

District Response:

- [Administrative Procedure 0103 – Transgender and Gender Diverse](#) (*see Exhibit I*)
- [Administrative Procedure 6153 - Student Field Trips, Day, Overnight or Virtual](#) (*see Exhibit VI*) governs the placement and privacy protections regarding overnight student accommodations.
- These documents can be found at: [PGCPS.org](#)

5. If not already provided in responses to the above items, the District's current Title IX policies and procedures. Please also provide the link(s) to the District's website where these documents may be found, or if not online, their publication locations.

The District's core Title IX compliance, grievance procedures, and definitions are fully established in:

District Response:

- If not fully covered by [Administrative Procedure 0104 – Title IX, Discrimination and Harassment on the Basis of Sex](#) (*see Exhibit V*), the complete Title IX grievance procedures and policy documents are outlined in the [Student Rights and Responsibilities Handbook](#) (*see Exhibit XI*)
- These documents can be found at: [PGCPS.org](#)

6. The name and contact information for the District's current designated Title IX Coordinator(s), including the dates in that role.

District Response:

- Name & Title: Steven R. Alfred, Director of Fair Practices and Title IX Coordinator
- Dates in Role: July 6, 2026 – Present
- Contact Information: E-mail: equity@pgcps.org / Phone: 301-952-6156

7. All documentation, including, but not limited to, complaints and responses thereto, internal and external correspondence, e-mails, notes, logs, and URLs, related to whether the District allowed male students to use intimate facilities, such as restrooms and locker rooms, designated for use by female students.

District Response:

Please see response provided in District Response No. 12

8. All documentation, including, but not limited to, complaints and responses thereto, internal and external correspondence, e-mails, notes, logs, and URLs, related to whether the District allowed male students to participate in athletic teams and programs designated for female students.

District Response:

Please see response provided in District Response No. 12

9. All documentation, including, but not limited to, complaints and responses thereto, internal and external correspondence, e-mails, notes, logs, and URLs, related to whether the District allowed male students to share overnight accommodations with female students.

District Response:

Please see response provided in District Response No. 12

10. The names and titles of all persons who assisted in the preparation of these data responses.

District Response:

- Steven R. Alfred – Director of Fair Practices and Title IX Coordinator
- Darnell L. Henderson, Esq. - General Counsel

11. If not already provided in responses to the above items, the names, job title, and contact information for any District employee with information relevant to the issues OCR is investigating.

District Response:

- Steven R. Alfred – Director of Fair Practices/Title IX Coordinator, Steven.alfred@pgcps.org
- Darnell L. Henderson, Esq. - General Counsel, Darnell.henderson@pgcps.org

12. A narrative response to the issues opened for investigation in this case and all documents referenced or relied upon in the narrative response.

District Response:

The following narrative constitutes the District's response to the issues under investigation by the U.S. Department of Education, OCR concerning allegations that District discriminates on the basis of sex by

maintaining policies that permit male students to use intimate facilities designated for female students, permit male students to share overnight accommodations designated for female students, and permit male students to participate on athletic teams designated for female students.

The District acknowledges that, on February 5, 2025, the President issued Executive Order 14201, followed by subsequent federal guidance addressing participation in girls' athletic programs and access to certain sex-separated facilities. In response to OCR's June 23, 2026, Request for Information, the District has produced copies of the Board's Policies and the District's Administrative Procedures responsive to OCR's request, including:

- [Administrative Procedure 0103 – Transgender and Gender Diverse](#) (*see Exhibit I*)
- [Administrative Procedure 0104 – Title IX, Discrimination and Harassment on the Basis of Sex](#) (*see Exhibit II*)
- Administrative Procedure 5183 – *Transgender and Gender Nonconforming Students* (effective April 12, 2021), superseded by [Administrative Procedure 0103 – Transgender and Gender Diverse](#) (*see Exhibit I*) effective July 1, 2023; and
- [Administrative Procedure 6153 - Student Field Trips, Day, Overnight or Virtual](#) (*see Exhibit VI*)
- [Board Policy 0101 - Educational Equity](#) (*see Exhibit XII*)
- [Board Policy 0102 - Culturally Proficient Schools and Central Offices](#), (*see Exhibit III*)
- [Board Policy 0103 - Inclusive Environments for LGBTQIA+ People](#) (*see Exhibit IV*)
- [Board Policy 0104 - Title IX](#) (*see Exhibit V*)
- [Board Policy 0118 – Mission, Vision, and Core Values](#) (*see Exhibit VIII*)
- [Board Policy 0125 - Nondiscrimination](#) (*see Exhibit IX*)

The referenced Board Policies and District Administrative Procedures were adopted based upon the District's understanding of applicable federal and Maryland law in effect at the time of their adoption, including Title IX and its implementing regulations. The District recognizes its obligation to comply with all applicable federal and state laws, including Title IX, and will continue to evaluate its policies, practices, and procedures consistent with those legal obligations.

The District has not completed a comprehensive review of its Board's Policies and District's Administrative Procedures following the issuance of Executive Order 14201 and subsequent federal guidance. Accordingly, the District makes no representation at this time as to whether revisions to any particular Board Policy or District Administrative Procedure may be warranted. Any future review and any resulting revisions will occur through the Board's established governance process and in accordance with applicable federal and state law.

The District is the second-largest public school system in Maryland, serving approximately 133,000 students in more than 200 schools. The school system is committed to providing a safe, supportive, respectful, and academically rigorous educational environment for every student. Consistent with its Vision, Mission, and Core Values, the District strives to develop distinguished learners, leaders, voices of social justice, and advocates for humanity who are prepared to thrive in an increasingly diverse global society. The District's mission is to provide a transformative educational experience anchored by excellence in equity, developing 21st-century competencies and enabling each student's unique brilliance to flourish while building empowered communities and a more inclusive and just world. These guiding principles inform the District's educational programs and the development, implementation, and ongoing evaluation of Board Policies and District Administrative Procedures.

Consistent with OCR's Requests for Information Nos. 7, 8, and 9, the District conducted a reasonable search for responsive records. With respect to Request for Information No. 8, the District did not identify any responsive records. With respect to OCR's Requests for Information Nos. 7 and 9, the District does not maintain a centralized repository for its more than 200 schools that can be used to determine whether it has received complaints and responses thereto, internal and external correspondence, e-mails, notes, logs, and URLs, related to whether the District allowed male students to share overnight accommodations with female students. Based on the information currently available to the District and after a reasonable inquiry, the District is not aware of any such records.

The District appreciates OCR's consideration of this response and remains committed to cooperating fully throughout this investigation. The District will continue to respond promptly to any additional requests for information and to evaluate its policies and practices in a manner consistent with applicable federal and state law. The District remains committed to ensuring that its educational programs and operations are administered in a manner that promotes safe, supportive, respectful, and nondiscriminatory learning environments for all students while fulfilling its obligations under Title IX and other applicable laws.

13. Any other information that will be helpful to OCR in this investigation.

District Response:

Based on the information currently known and available to the District following a reasonable inquiry, the District has provided the information and documents responsive to OCR's Request for Information. The District reserves the right to supplement or amend this response should additional responsive information become known.

Should you need any additional information that the OCR believes may be helpful in resolving this complaint, please contact me via email at steven.alfred@pgcps.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Alfred", with a stylized, cursive script.

Steven R. Alfred,
Director of Fair Practices and Title IX Coordinator