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July 27, 2026

Ms. Patti Bowen
Acting Superintendent, Longview School District
2715 Lilac Street
Longview, WA 98632

Re: Options for policy changes and program development following reports of sexual assault at Mark Morris High School

Dear Ms. Bowen:

In February of 2026, two students from Mark Morris High School (MMHS) were arrested and charged with sexually assaulting fellow basketball players inside the boys' locker room during the 2025-26 season. Following the students' arrests, the Longview School District retained me to review the district's policies and procedures and identify potential changes. The district's goals are to improve systems, train staff, protect students, and achieve transparency with the public. The district also seeks to establish a positive culture that does not tolerate bullying and hazing of students or athletes.

In developing potential options, I reviewed records related to the reported assaults, including police reports, media coverage, and notes from the district's interviews with students. I reviewed existing district policies, including the sexual harassment policy; harassment, intimidation, and bullying (HIB) policy; child abuse reporting protocols; and student codes of conduct. To identify prevailing standards of care, I researched policies from other school districts and national organizations concerning student disciplinary rules, sports safety, athletics supervision, and child abuse reporting.

The district is separately conducting a sexual harassment investigation under Title IX and has also retained an outside investigator to review the district's compliance with mandatory reporting and other obligations. In addition, as widely reported in the media, on May 21 the superintendent was arrested and charged with witness tampering, failure to report child abuse, and obstructing a law enforcement officer. To avoid interfering in the criminal proceedings and other investigations, I did not interview the alleged victims, the arrested students, their families, or district employees other than the high school athletic directors and the MMHS basketball coach.

The circumstances here are complex, and the criminal cases and related investigations are still underway. Accordingly, this report does not attempt to give a full recitation of what occurred or how the district responded to it. Rather, the report highlights the circumstances I found relevant to my recommendations.

My review demonstrates that to avoid future incidents, the district may wish to make district-wide and building-specific amendments to its policies and procedures, develop protocols for locker room supervision, adopt an anti-hazing program, and conduct additional staff and student training.

REPORTED LOCKER ROOM INCIDENTS

Around 10:30 p.m. on January 28, 2026, the MMHS boys' basketball coach received a phone call from the parent of a player on the boys' basketball team (Student 1). The parent told the coach that an older team member (Student A)¹ had engaged in a lewd and bullying act toward a younger player. The coach reported this to the MMHS assistant principal the next morning, January 29, 2026.²

The assistant principal interviewed Student 1, Student A, and a third student who witnessed the incident. The interviews confirmed that in the locker room after practice the previous day, the incident had occurred as reported by Student 1. The assistant principal suspended Student A for the remainder of that day plus two additional school days.

On the afternoon of January 29, two members of the girls' basketball team told the boys' coach that a male basketball player (Student 2) had been sexually assaulted by other players. The girls told the coach the assault consisted of unwelcome physical contact and threats of a potentially sexual nature.

The coach brought Student 2 in for an interview with the assistant principal. Student 2's description of the incident did not match what the girls had told the coach. The assistant principal asked Student 2 if anything "sexual" occurred, and Student 2 said no. Student 2 identified several students who might have witnessed the incident, as well as a third potential victim.

The assistant principal interviewed the third potential victim (Student 3) and all the students whom Student 2 identified as potential witnesses. Student 3 reported that Students A and B engaged in lewd and bullying conduct, such as pinning other players down, rubbing their rear ends on players' faces, twerking on players while they were pinned against the wall, and spraying players' body parts with Biofreeze.³ Student 3 reported that a third student (Student C) participated in the behavior.

¹ For clarity, I use letters to refer to students who were alleged perpetrators and numbers to refer to students who were alleged victims.

² The coach and MMHS athletic director indicated that, prior to receiving this report, they had not heard any reports of abuse or mistreatment of basketball players.

³ Biofreeze is a topical pain relief product that delivers a cold sensation.

The assistant principal suspended Student A for an additional three days, on top of the initial suspension for the water bottle incident. He suspended Students B and C for three days. The coach removed Students A, B, and C from the basketball team, along with a fourth student who was identified as potential perpetrator, who was also suspended from school. For the next few days, the assistant principal continued interviewing students who were potential victims, witnesses, and perpetrators, and the district contacted the parents of all team members.

In their interviews with the assistant principal, multiple students used the word “hazing.” However, the students did not seem to have a unified understanding of this term. Rather, some students characterized the locker room incidents as hazing while others said the conduct was bullying but *not* hazing. No student defined what he thought the term “hazing” meant.

The records do not indicate that the assistant principal or others informed the district’s Title IX coordinator that the locker room incidents had been reported, and the Title IX coordinator did not participate in the assistant principal’s investigation. The publicly available information does not indicate when the district’s insurer, risk management professionals, or contracted attorneys were informed of the incidents or the assistant principal’s investigation.

On February 9, 2026, the father of a MMHS basketball player (referred to as “John Doe 1” in the police reports) reported to the Longview Police Department and the district’s School Resource Officer (SRO)⁴ that his son had been sexually assaulted in the locker room. This student, whom the assistant principal had interviewed a few days earlier, reported that he was assaulted in the varsity team room, which is a small room inside the locker room. This room is windowless, and when the lights are turned off, is completely dark inside. The room contains cubbies, equipment storage, athletic awards, and team memorabilia. The varsity basketball players at MMHS used it as their space.

The student told the police that Students A and B assaulted or attempted to assault him on additional occasions, including in late January before the coach removed them from the team. Police detectives interviewed three other students, who alleged that they were also assaulted in the team room by Students A and B, among others. In subsequent interviews, students told police that the lights in the team room were sometimes shut off.

According to the police report, a student told the police that other players—whom he defined as “the whole [varsity] team”—were present during the alleged assaults. This student reported hearing players laugh. Students named a handful of other students who were notably absent when the reported assaults occurred, who were characterized as likely to report

⁴ The SRO is a Longview Police Department employee who works on contract with the district to provide law enforcement assistance and a security presence in schools.

problems if they observed them. One student told police that he was uncomfortable with the team culture and how some players treated younger players; accordingly, he would rush to get changed in the locker room and leave as soon as possible. This student was one of the students who was identified as likely to report a problem if he observed it. The police narrative implies that the alleged perpetrators might have waited for students like him to leave.

On February 19, 2026, Longview police arrested Students A and B at school and charged them with multiple criminal offenses. Trial was set and then rescheduled to January 2027. Longview police took the students' phones into evidence upon their arrest. Pursuant to a warrant, police later found Snapchat videos taken inside the MMHS locker room, which depict what law enforcement records describe as hazing, assaultive, and sexualized behavior toward other players.

RELEVANT EXISTING POLICIES

The district has several existing policies and procedures that apply to the above-described circumstances. District policies prohibit sexual harassment of students, including sexual assault. District policies also prohibit the harassment, intimidation, and bullying (HIB) of students. The student codes of conduct establish rules against assault, harassment, hazing, and dangerous behavior, as well as consequences for rule violations. Finally, a district procedure indicates that locker rooms should be “monitored,” although it does not define what that means.

Many of the district's policies—notably, for this case, the sexual harassment and HIB policies—mirror the model policies adopted by the Washington State School Directors' Association (WSSDA). It is common practice for school districts in this state to adopt the WSSDA policies without significant revisions, as Longview did in this case.

Below is a summary of the pertinent portions of applicable existing policies and/or procedures, including, where warranted, suggested revisions.

Policy 3205 - Sexual Harassment of Students Prohibited

Longview School Board Policy 3205 prohibits sexual harassment of students. This policy was adopted in accordance with state law⁵ and Title IX of the Education Amendments of 1972, which is a federal law that prohibits sex discrimination in education programs receiving federal financial assistance.

Under state law and Title IX, an essential component of educational equity is the elimination of sexual harassment, which includes “acts of sexual violence” as well as

⁵ RCW 28A.640.020 and WAC 392-190-057 require school districts to adopt sexual harassment policies that meet specified criteria.

“unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the education program or activity.” Policy 3205 requires the district to investigate reports of sexual harassment and to take “prompt and effective steps reasonably calculated to end the sexual harassment, eliminate the hostile environment, prevent its recurrence and as appropriate, remedy its effects.”

Pursuant to state law and Policy 3205, the district appointed a Title IX coordinator, who is an administrator at the district office. Any school employee who receives a report of sexual harassment must notify the Title IX coordinator.⁶ This is intended to ensure that there is someone with sufficient knowledge to conduct at least a basic intake, triage the situation, and arrange for an investigation of potential sexual harassment. The Title IX coordinator must be trained on the definition of sexual harassment, how to conduct impartial and unbiased investigations (or arrange for third parties to conduct such investigations), and “how to raise awareness of and eliminate bias based on sex.”

When sexual harassment allegations could rise to the level of a criminal assault, the Title IX coordinator and school principal must notify law enforcement. They must also “notify the targeted student(s) and their parents/guardians of their right to file a criminal complaint and a sexual harassment complaint simultaneously.” However, a criminal investigation, charge, or proceeding “does not relieve the district of its independent obligation to investigate and resolve sexual harassment.”

As noted, the publicly available information does not indicate when the district’s Title IX coordinator was informed of what was happening at MMHS. The coordinator did not take part in the assistant principal’s investigation.

Policy 3207 – Prohibition of Hazing, Intimidation, Bullying, Threats, Assault, and/or Other Illegal Discrimination⁷

Board Policy 3207 prohibits harassment, intimidation, bullying (HIB) and other similar conduct toward students. The policy defines HIB to include:

Any intentional electronic, written, verbal, or physical act ... when the act:

A. Physically harms a student or damages the student’s property;

⁶ The policy also refers to a “civil rights coordinator.” The district currently has a single employee serving in both roles.

⁷ On the district’s website, this policy is listed with the title, “Prohibition of Hazing, Intimidation, Bullying, Hazing, Threats, Assault, and/or Other Illegal Discrimination.” (emphasis added). The double use of the word “hazing” is likely a typographical error. Regardless, the policy does not actually address hazing.

- B. Has the effect of substantially interfering with a student's education;
- C. Is so severe, persistent, or pervasive that it creates an intimidating or threatening educational environment; or
- D. Has the effect of substantially disrupting the orderly operation of the school.⁸

Procedure 3207P defines “bullying” as “unwanted aggressive behavior(s) by another youth or group of youths that involves an observed or perceived power imbalance and is repeated multiple times or is highly likely to be repeated.” HIB may consist of such conduct as innuendoes, pranks, gestures, physical attacks, and threats. Engaging in HIB may be grounds for discipline, including emergency removal, suspension, or expulsion depending on the severity of the conduct.

In accordance with state law, the district must maintain an anti-HIB program that includes the appointment of a HIB compliance officer, age-appropriate education for students, training for staff, and “prevention strategies.” The HIB compliance officer oversees the investigation and resolution of HIB complaints, as the Title IX coordinator is expected to do for sexual harassment.

The existing policy cross-references the district's anti-discrimination policy (3210) but *not* the sexual harassment policy (3205). In its current form, Procedure 3207P states:

If a written report of harassment, intimidation, or bullying indicates a potential violation of the district's nondiscrimination policy [Policy 3210], or if during the course of an investigation, the district becomes aware of a potential violation of the district's nondiscrimination policy, the compliance officer must promptly notify the district's civil rights compliance coordinator.

The district should consider revising policy/procedure 3207 to create an additional failsafe when HIB allegations are potentially sexual in nature. To help ensure that the Title IX coordinator is in the loop—the district could amend the HIB procedure as follows:

If a ~~written~~ report of harassment, intimidation, or bullying indicates a potential violation of the district's nondiscrimination policy [Policy 3210] or sexual harassment policy [Policy 3205], or if during the course of an investigation, the district becomes aware of a potential violation of the district's nondiscrimination

⁸ This definition mirrors state law. See RCW 28A.600.477.

policy or sexual harassment policy, the compliance officer must promptly notify the district's civil rights compliance coordinator and Title IX coordinator.⁹

Finally, the HIB policy references student "bystanders." It states, "If the conduct was of a public nature or involved groups of students or bystanders, the district should strongly consider schoolwide training or other activities to address the incident." However, neither the procedure nor the student conduct policies indicate whether the district may discipline bystanders for observing a bullying incident and encouraging it or not taking action.

In light of the concerning report that multiple students stood by, or even laughed along, during the student misconduct, the district may wish to adopt policy language that allows for the discipline of bystanders in appropriate cases. This could include amending the definition of HIB to reference bystanders, as follows:

Harassment, intimidation, or bullying can take many forms including, but not limited to, slurs, rumors, jokes, innuendoes, demeaning comments, drawings, cartoons, pranks, gestures, physical attacks, threats or other written, oral, physical or electronically transmitted messages or images directed toward a student. Students who are willing bystanders or encourage others to engage in HIB may also be found to have committed HIB.¹⁰

A more challenging question is whether to discipline students if they merely observe bullying acts and fail to report, as opposed to willfully standing by or encouraging bullying. There are potential downsides to doing this, as it could open the floodgates to disciplinary consequences and lead to disciplinary decisions that do not hold up on appeal. It could also punish students who stay quiet out of fear or other legitimate reasons.

Regardless of whether it chooses to adopt disciplinary provisions for bystanders, the district could foster a culture that encourages students to report. Students may be more inclined to report if the school culture promotes positivity, mutual care, leadership, and teamwork, such that students understand they should protect fellow students and teammates. This is discussed further below in conjunction with the discussion of an anti-hazing program.

⁹ The district currently has the same administrator serving as both the civil rights and Title IX coordinators. Even if this remains the case, making this amendment to the policy will emphasize the importance of flagging sexual assault allegations and running them through the proper channels.

¹⁰ Additional suggested amendments to codes of conduct to address bystanders are included in the discussion of the codes of conduct, below.

Policy 3240, Procedure 3240P, and Procedure 2151P - Student codes of conduct

The district has relevant codes of conduct governing students in two places: general rules that apply to everyone and rules that apply to participants in extracurricular activities. Both could benefit from clarification.

Board Policy 3240 addresses student conduct, expectations, and consequences for rule violations. It states:

Students who involve themselves in acts that have a detrimental effect on the maintenance and operation of the school or the District, criminal acts, and/or violations of District rules and regulations may be subject to discipline by the District and prosecution under the law.

The superintendent or designee will develop reasonable rules of student conduct (see Procedure 3240P) for the preservation of the health and safety of students and employees and the preservation of an educational process that is conducive to learning. Such rules will state with reasonable clarity the types of misconduct for which discipline, including suspension and expulsion, may be imposed.

Procedure 3240P adopts student conduct rules, the following of which applied to the conduct that was reported to have occurred in the locker room:

Assault – Students will not intentionally use physical force or violence on another person, or threaten or attempt to use such physical force or violence that is harmful or offensive, regardless of whether any physical injury is done to the person.

Criminal Behavior – Students who involve themselves in criminal acts on District property, off District property at school-sponsored events, or off District property when such acts have a detrimental effect upon the maintenance and operation of the schools or the District are subject to corrective action by the District as well as potential prosecution under the law

Dangerous Behavior – Students will not engage in behavior which a reasonable person would know creates a risk of injury to another person or property.

Harassment, Intimidation, and Bullying/Cyberbullying – Students will not participate in, conspire to participate in, or conspire for others to engage in “harassment, intimidation, and bullying/cyberbullying.” In general, HIB means any intentionally written message or image, including those that are electronically transmitted (e.g. sexting), or a verbal or physical act that physically harms a student or damages his or her property; has the effect of substantially interfering with a

student's education; is so severe, persistent, or pervasive that it creates an intimidating or threatening educational environment; or has the effect of substantially disrupting the orderly operation of the school. . . . Prohibited HIB can include, but is not limited to, slurs, rumors, jokes, innuendoes, demeaning comments, drawings, cartoons, pranks, gestures, physical attacks, threats, or other written, oral, or physical actions.

Hazing – Students will not participate in, conspire to participate in, or conspire for others to participate in acts that injure, degrade, or disgrace—or tend to injure, degrade, or disgrace—other people. Hazing may also constitute prohibited harassment, intimidation, and bullying/cyberbullying (HIB).¹¹

Accordingly, the district already has rules on the books that prohibit assaulting fellow students and, as noted, the students involved in the incidents were suspended for violating the rules. Since the news of the incidents broke in early February, questions have been raised as to whether the district administered appropriate discipline to the offenders. This report does not examine that question, except to point out that the consequences for rule violations—such as short-term suspension, long-term suspension, emergency removal, and expulsion—are closely constrained by state law.¹²

I understand that the district intends to overhaul its conduct and student discipline rules and procedures to make them clearer and more current. This is a good idea regardless of the current situation. In updating its codes, the district should work with its legal counsel to ensure that the updated rules and procedures comply with state law. As noted, there is not much room to maneuver on the level of consequences that can be imposed for each offense, other than to ensure that administrators administer discipline equitably and follow the correct process so that disciplinary decisions hold up on appeal.

There is significant room for improvement in Procedure 2151P, which is the code of conduct for extracurricular activities, including athletics. This code is vague and not comprehensive. It declares that it is a “privilege” to participate in interscholastic athletics; accordingly, players “are expected to conform to specific conduct standards established by the

¹¹ As explained more fully below, the district's current definition of “hazing” does not reflect the generally accepted definition of this term.

¹² The Washington Administrative Code establishes statewide standards for imposing various levels of discipline and prescribes a process for doing so. Students have the right to contest and/or appeal disciplinary decisions. *See* Chap. 392-400 WAC. Under WAC 392-400-440, a school district may issue a long-term suspension or expulsion only for specific offenses, *and* only when the district finds that returning the student to school before completing a long-term suspension or expulsion “would pose an imminent danger to students or school personnel.”

board of directors, principals and athletic coaches.” Students who violate “any rule” are subject to removal from the team, but most of these rules are not specified clearly.

Procedure 2151P prohibits students from using alcohol, drugs, and tobacco; being suspended from school; failing to meet GPA or enrollment requirements; or being arrested or charged with criminal offenses. The policy does not specifically preclude students from engaging in sexual harassment, HIB, or other violations of general codes of conduct—unless they are suspended from school for doing so. Procedure 2151P does, however, authorize head coaches and advisors to establish additional team rules, subject to approval by the building principal.

I understand the district plans to significantly amend, or replace entirely, the athletic code of conduct to deal with issues both related and unrelated to the reported assaults at MMHS. For example, district administrators communicated dissatisfaction with how the code of conduct handles alcohol and tobacco violations. Again, the district should work with its legal counsel to ensure that whatever changes it adopts are compliant with state law. It may be helpful to review models from other school districts, some of which are more robust and clearer about rules for participating in extra-curricular activities and the consequences for violating the rules.¹³

It may be helpful to reframe the new code as a contract that students sign rather than a list of top-down expectations. While the current code has a place for students to acknowledge that they read it, the code is written in third person, so that it does not “speak” directly to the students. Third-person language is more likely to go in one ear and out the other. Sample documents I reviewed from other school districts frame the language in first person.

For example, instead of having a code that states, “Tobacco and vaping are prohibited,” the language could state, “I agree that if I smoke, vape, or use tobacco, I will forfeit the privilege of participating in extra-curricular activities.” This could help send the message that students are ultimately in control of whether they remain eligible.

Below is an example of introductory language the district could incorporate into a new student contract:

I understand that the opportunity to participate in the interscholastic athletic program is a privilege granted to all students of the district. As a participant, I agree to follow this contract, the rules and regulations of my school, the Longview School District, the Conference, and the WIAA, and to conduct myself in a safe and sporting manner. I understand that if I violate the rules, I could be disciplined, suspended, or

¹³ See, e.g., [Shoreline School District student athlete forms](#)

expelled from school, in addition to being suspended or removed from the team or activity.

Additionally, the district could include the following language prior to the student signature block, to emphasize the contractual nature of the rules:

I have read and understand the Code of Conduct for Extracurricular Activities. I agree to represent my school and the Longview School District with honor and respect. It is an expectation that my sportsmanship both as a participant and a spectator will be positive and appropriate. This includes my language; my treatment of officials; and respect for my coaches, school, team, opponent and contest. My behavior and appearance in class, online, and at school functions will be appropriate at all times.

To ensure student understanding of any new conduct code, the district might establish the expectation that coaches and/or team captains verbally cover the rules and expectations in pre-season meetings.

Procedure 5253P – Maintaining Professional Staff/Student Boundaries

Procedure 5253P, related to the district’s boundary invasion policy, suggests that locker rooms should be “monitored.”¹⁴ The procedure does not define what it means to “monitor” the locker rooms. However, the language reflects the concern that privacy violations may arise if staff are with students in restrooms or locker rooms. Accordingly, it directs staff to prevent one-on-one access to students and to “Assign at least two educators to monitor bathrooms and locker rooms of their gender, when possible. . . . Use separate bathrooms, locker rooms, and showers from student or, if separate facilities are not available, schedule separate usage times.”

As discussed more fully below, the district may wish to adopt more specific protocols for supervising locker rooms, which address student safety while protecting privacy. If the district does so, it should amend Procedure 5253P to ensure consistency.

Policy 3421 – Child Abuse, Neglect and Exploitation Prevention

State law designates professional school personnel as mandatory reporters of child abuse, neglect, and exploitation.¹⁵ Whenever such employees have “reasonable cause” to believe a child has suffered abuse, they must “report the incident, or cause a report to be made,” to a law enforcement agency or CPS. The state law requires mandatory reporters to

¹⁴ These provisions are linked as “additional guidelines” to the procedure. [Policy & Procedure Posts - Longview School District](#). They are difficult to find without digging.

¹⁵ RCW 26.44.020, .030.

make an “immediate oral report” by telephone or otherwise and, if requested, follow up with a written report. The report “must be made at the first opportunity, but in no case longer than forty-eight hours after there is reasonable cause to believe that the child has suffered abuse or neglect.”¹⁶

Board Policy 3421, adopted pursuant to the statute, states:

All staff¹⁷ are responsible for reporting all suspected cases of child abuse, neglect, and exploitation to the proper authorities and/or the appropriate school administrator. Under state law staff are free from liability for reporting a reasonable suspicion of child abuse, neglect, or exploitation. However, failing to report the incident may result in criminal liability regardless of whether the authorities determine the incident is provable in a subsequent legal proceeding.

The policy requires reporting upon reasonable suspicion; staff shall not wait to verify that abuse occurred before making a report. It states:

Staff need not verify a report that a child has been abused, neglected, or exploited. Any conditions or information that may reasonably be related to child abuse, neglect, or exploitation should be reported. Legal authorities have the responsibility for investigating each case and taking appropriate action under the circumstances.

The policy defines child abuse to include sex offenses against minors. Its definition encompasses “intentionally contacting, directly or through the clothing, the genitals, anus or breasts of a child unless the contact is necessary for the child’s hygiene, or health care [and] a child’s intentional or coerced contact with anyone’s genitals, anus, or breasts.”¹⁸ As described above, the conduct that the basketball players alleged to the assistant principal potentially met this definition. The conduct they later alleged to the police definitely did.

¹⁶ RCW 26.44.040.

¹⁷ By requiring “all staff” to report suspected child abuse, the district policy is broader than the state law, which confines reporting obligations to “professional school personnel.” The statute states, “‘Professional school personnel’ include, but are not limited to, teachers, counselors, administrators, child care facility personnel, and school nurses.”

¹⁸ WAC 110-30-0030 defines sexual abuse to include “Intentionally touching, either directly or over the clothing, of the sexual or other intimate parts of a child or youth” except for hygienic or medically necessary reason. It further includes, “Intentionally allowing, permitting, compelling, encouraging, aiding, or otherwise causing a child or youth to engage in touching the sexual or other intimate parts of another for the purpose of gratifying the sexual desire of the individual touching the child or youth, the child or youth, or a third party.” In making amendments to the policy, the district may wish to standardize its definitions with the state law.

While child abusers are traditionally pictured as parents who harm or neglect their children, district policy explicitly, and correctly, provides that *students* may commit child abuse. It states:

Children (including other students), family members, and any other adult can engage in child abuse, neglect, or exploitation. This may include incidents of student on student misconduct. Staff should report all incidents of abuse regardless of the age of the person who engages in it.

The existing policy offers a clear definition of child abuse and unambiguously requires that it be reported; however, it could benefit from clarification on *who* must make the report. Procedure 3421P states that staff *or* the principal shall contact CPS or law enforcement. It further states, “Staff shall inform the principal/designee of instances of reported suspected abuse, neglect, or exploitation. In his or her absence, the report will be made to the nurse or counselor.” This could be interpreted to suggest that if a school employee has reasonable cause to suspect abuse, they may absolve themselves of reporting if they tell the building principal, nurse, or counselor. This creates a risk that reporting obligations may fall through the cracks.

To shore up its reporting protocols, the district could revise the verbiage to clarify that the mandatory reporter who observed the circumstances leading to the conclusion of reasonable cause bears the primary responsibility for reporting. Suggested revisions are as follows:

In Policy 3421: ~~All staff~~ Mandatory reporters are responsible for reporting all suspected cases of child abuse, neglect, and exploitation to the proper authorities ~~and/or~~ the appropriate school administrator.

In Procedure 3421P: When there is reasonable cause to believe that a student has suffered abuse, neglect, or exploitation, staff ~~or the principal~~ shall contact the nearest office of the child protective services (CPS) of the department of social and health services (DSHS) and the police or sheriff. ~~Such contact must be made within forty-eight (48) hours. The report must be made at the first opportunity, but in no case longer than forty-eight (48) hours after there is reasonable cause to believe that the student has suffered abuse, neglect, or exploitation.~~

In Procedure 3421P: Staff shall inform the principal/designee of instances of reported suspected abuse, neglect, or exploitation. In his or her absence, the report will be made to the nurse or counselor. Reporting to the principal/designee, nurse, or counselor does not relieve staff of the obligation to report suspected abuse, neglect, or exploitation to law enforcement or CPS.

In reality, school employees often coordinate who makes the report; this is an acceptable practice as long as the report is made in a timely manner. However, the policy should not be worded to create a loophole and a risk that abuse goes unreported.

Finally, the district might amend Procedure 3421P to require that staff alert the Title IX coordinator whenever a student or school employee is suspected to have sexually assaulted or abused a student. A revised Procedure 3421P could include a new section 5 that states:

5. When there is reasonable cause to believe a student or school employee has engaged in sexual abuse toward a student, as defined in BP 3421, staff shall inform the district's Title IX coordinator in addition to performing their other reporting obligations.

LOCKER ROOM SUPERVISION AND ANTI-HAZING PROGRAMS

In addition to the policy revisions described above, the district may wish to adopt new programs to address locker room supervision and hazing.

Locker room supervision

I understand that immediately after the incidents were reported, the MMHS basketball coach implemented changes designed to augment supervision and limit the opportunity for student misbehavior. The coach prohibited players from using the locker room without the coach or assistant coach in the varsity team room with the door open, prohibited players from using the gym alone, and urged players to report any problems to the coach, counselor, or players.

These were all appropriate interim measures to take; however, with further study, the district should be able to develop more precise supervision protocols and adapt them to individual programs and school buildings. The district should develop expectations that staff supervise students in locker rooms, with four goals in mind:

1. Students should be supervised without unreasonably invading their privacy.
2. Supervision expectations should be realistic and sustainable.
3. Student access to locker rooms should be time- and needs-restricted, and secluded areas should be locked off.
4. Students should be held to a code of conduct while using locker rooms.

Goal 1: Supervise students without unreasonably invading their privacy.

School locker rooms are inherently challenging to supervise, as adults risk invading students' boundaries and violating their privacy if they are in proximity while students change clothes or shower.¹⁹ The U.S. Center for SafeSport²⁰ emphasizes the need for adults to respect youth boundaries and privacy. However, SafeSport acknowledges that this must be balanced against the risk that misconduct and injuries can occur in unsupervised locker rooms. According to SafeSport:

[L]eft unmonitored, [locker rooms] can quickly turn dangerous. From negative "locker room talk" to silly behavior that sometimes becomes inappropriate, the locker room can foster actions that might appear harmless but can easily become abusive.²¹

I was told that the news of the assaults at MMHS alarmed athletic directors and school administrators throughout the state. Some athletic directors in other districts, as a kneejerk reaction, said they were going to require that adults *always* be present in their districts' locker rooms when students are using them. Establishing this as an expectation has significant downsides. For one thing, requiring an adult to be physically present puts students at risk of boundary and privacy violations, and it puts adults at risk of accusations. For this reason, adults often feel uneasy being in proximity when students are unclothed.

Moreover, the district will encounter cases where the coach is the opposite sex of the athletes. This is particularly prevalent with girls' teams having male coaches. While it might be tempting to proclaim that a female staff member or volunteer (such as a team mother) will always supervise the locker room, such assistance may not always materialize. Due to gender equity and Title IX requirements, the district cannot constrain female participation in sports based on whether a woman is available to supervise the girls' locker room.

As noted, after the incidents were reported, the MMHS basketball coach occupied the varsity team room so that he would be in proximity to the players but not looking directly at them. While that approach could work under certain scenarios, it will not work in locker rooms that lack an interior team room. It could also create the risk that team rooms could be

¹⁹ Prior to the start of the season, the basketball coach eliminated the requirement for the players to shower so that students would not feel unnecessarily exposed or uncomfortable. I was told that in many sports in the district, the athletes no longer shower after practice or games. Eliminating mandatory showers for most sports could be a good practice to maintain going forward. Exceptions may be appropriate if necessary for health reasons, such as for swimmers (chlorine irritation) and wrestlers (bacterial or parasitic infections).

²⁰ [2024 SafeSport Minor Athlete Abuse Prevention Policies](#). The U.S. Center for SafeSport is a 501(c)(3) nonprofit organization that was created by act of Congress in 2017, in response to incidents of sexual abuse in youth sports.

²¹ [The Critical Need for Locker Room Safety | U.S. Center for SafeSport](#)

left unlocked, and therefore accessible to students, when the coach leaves. Most locker rooms in the district do not have interior team rooms such as those found at MMHS. Athletes and coaches at R.A. Long have team meetings in a room adjacent to the upstairs portion of the gym. This room has windows and is not dark or secluded.

If the district does determine, for any particular age groups or schools, that adults should supervise from inside locker rooms, adults should station themselves so they are not in direct line of sight to students who are unclothed.

Goal 2: Establish supervision protocols that are realistic and sustainable.

The district should avoid setting supervision expectations that are unrealistic and might not be carried out. Rather, district administration should work with coaches, athletic directors, and other affected building staff to develop sustainable protocols. Like all school districts, Longview has a limited budget, and its employees juggle multiple responsibilities. Whatever rules the district adopts now could become the standard of care going forward. Increased harm, as well as heightened liability, may ensue if unrealistic rules are not followed.

State law does not require that adults continuously supervise students at all times, particularly at the high school level. Rather, schools must provide supervision that is reasonable under the circumstances, considering the age of the students, the nature of the activity in which they are engaged, and any prior misconduct or vulnerabilities of the students involved. Supervision must be tailored to prevent harm, but it also must be practical and capable of being accomplished within realistic budgetary and staffing levels.

With that in mind, district administrators should work with building staff to develop and tailor expectations based on staffing levels, student ages, the needs of individual sports, and other relevant factors. Supervision protocols will be more successful if they are developed in consultation with those who will be expected to implement them. Coaches, P.E. teachers, and building administrators might have creative suggestions pertaining to specific sports or spaces. It would be best to put supervision plans, once developed, in writing.

Supervision expectations should be tailored to architectural differences in school facilities. Within the district, high school athletes have access to multiple sets of locker rooms at R.A. Long High School, MMHS, the pool, and the stadium. For example, football and baseball players at MMHS use different locker rooms than the basketball players, so as to protect the floors from cleats among other issues. Different locker rooms have different layouts that affect how easy or challenging they are to monitor. Some have adjoining offices with windows that enable supervision. It is easier in some than in others for an adult to stay within earshot of students. Some locker rooms have an open format with no separate or secluded spaces.

While not directly relevant to the reported assaults that occurred in this case, the district could adopt additional measures to augment supervision in other areas of athletics. For example, building staff could prohibit students from using the gym unsupervised and ensure that coaches or other supervising adults ride the buses with students to athletic events.

Goal 3: Restrict access to locker rooms.

The district may find it beneficial, as part of consulting with stakeholders and establishing supervision plans, to restrict locker room use on a time and needs basis. This may include allowing students to use the locker rooms only when there is a true need and otherwise ensuring that locker rooms are secured and inaccessible. To prevent students from loitering in locker rooms, staff could set a time limit for locker room use that is only long enough to change clothes and put belongings away. Students should be made aware of any such time limit and understand that it will be enforced. As an additional safeguard, a coach or other responsible adult could do a sweep at the end of the time limit to make sure all students are out, before locking the door. If the coach is the opposite sex of the players, he or she could enlist team captains to monitor the time limit and conduct the sweep.

Secluded areas, such as interior team rooms or storage rooms, should be locked off unless they are being utilized or supervised by adults.²² Students also should not have the ability to turn lights on and off. Rather, the district should consider configuring light switches so that they require a key. If it makes sense based on such factors as locker room configuration and team size, coaches might require students to utilize lockers in a limited number of rows, thereby corralling students into a smaller area that is easier to supervise.

Goal 4: Adopt a locker room code of conduct.

Finally, the district should consider adopting a code of conduct for students in locker rooms. Such a code could prohibit unnecessary and unwanted physical contact between students and ban the use of cellphones and recording devices. As part of their pre-season meetings with players and parents, coaches could discuss the code of conduct with players and ensure they understand that it will be enforced. The district could also consider posting signs in locker rooms reminding students of the rules.

Below are some simple standards the district could incorporate if it adopts a new student contract or code of conduct for athletics and extracurricular activities. The district could adopt similar language in its general code of conduct, to address students in P.E. classes:

²² On a long-term basis, locker rooms might be reconfigured to eliminate shower areas and create open spaces that can be monitored more easily.

As a participant in athletics, I will use the locker room facilities only to change my clothes and store my belongings. I will not loiter in the locker room or stay longer than necessary or as directed by my coach. While in the locker room, I will not engage in roughhousing or horseplay, have unnecessary or unwanted physical contact with other players, or engage in bullying or harassment of others.

As noted, police found videos taken inside the locker room on students' phones. To address that problem, the district might incorporate the following language into the code of conduct for extracurricular activities:

I will not use my cellphone except in case of emergency. I understand that taking photographs or videos inside the locker room violates other people's privacy and is prohibited.

The district might also revise Policy 3245, which generally addresses cellphone use, as follows:

Students will not use telecommunication devices in a manner that poses a threat to academic integrity, disrupts the learning environment or violates the privacy rights of others. Students shall not use cellphones in restrooms or locker rooms except in cases of emergency. Students shall not take photographs or videos inside locker rooms or restrooms.

Adopt an anti-hazing program

In addition to establishing locker room supervision expectations, the district may wish to adopt a program to address hazing. As noted, the district's general code of conduct references "hazing." However, it vaguely defines the term as "acts that injure, degrade, or disgrace—or tend to injure, degrade, or disgrace—other people." Under the current rule, hazing is indistinguishable from HIB.

While there is some overlap between hazing and HIB, they are distinct. According to the nonprofit Stophazing.org,²³ "A simple way to distinguish hazing from bullying is that hazing typically occurs for the expressed purpose of *inclusion* whereas youth who bully are typically seeking to *exclude* and marginalize another child."²⁴ In other words, hazing occurs when students engage in bullying or harassing conduct to initiate a newer or younger student into an organization, such as a sports team.

²³ The Office of the Superintendent of Public Instruction links to [Stophazing.org](https://stophazing.org) as a resource for anti-hazing programs.

²⁴ [Intersections of Hazing | StopHazing | Hazing Prevention Resource](#)

Another distinction between HIB and hazing is that students who are subjected to HIB are generally unwilling victims. Students who are subjected to hazing, however, may willingly submit or go along with the misconduct because they want to be included in the group. StopHazing.org defines hazing to make these distinctions clear. Under that organization's definition, hazing includes:

Any activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them, regardless of a person's willingness to participate.

A slogan from StopHazing.org emphasizes the willingness aspect. It states, "Just because they said yes ... doesn't mean it's not hazing."²⁵

Longview is not alone in blurring hazing into its HIB policies and not having a unique anti-hazing program. WSSDA has not adopted a model policy on hazing for K-12 schools, and as a result, codes of conduct for middle and high schools generally do not address it. Rather, hazing has mostly been addressed at the college level.²⁶ Hazing is naturally a bigger problem on college campuses due to communal living situations and ultra-competitive environments.²⁷

As a disclaimer, it is not entirely clear that what reportedly occurred in the MMHS locker room was "hazing" in the technical sense, or that it was a traditional or initiation ritual like one might see in a college fraternity. No students reported to the assistant principal or to law enforcement that they submitted to the misconduct to secure their position or standing on the team.

Regardless, I understand that the district wishes to explore proactive approaches and adopt additional tools to protect students. Adopting a hazing program could be a good idea, even if the district's existing sexual harassment and HIB policies already cover the behavior

²⁵ [Digital Tools & Downloads | StopHazing | Hazing Prevention Resource](#)

²⁶ In 2022, the Washington State Legislature adopted a hazing law, which applies only to post-secondary educational institutions. As subsequently amended, RCW 28B.10.900 defines "hazing" to include "any act committed as part of a person's recruitment, initiation, pledging, admission into, or affiliation with a student organization, athletic team, or living group, or any pastime or amusement engaged in with respect to such an organization, athletic team, or living group that causes, or is likely to cause, bodily danger or physical harm, or serious psychological or emotional harm ... regardless of the person's willingness to participate." The statute excludes "customary athletic events or other similar contests or competitions." Hazing may be a misdemeanor or a felony, depending on the extent of the harm. Under the state law, colleges and universities must prohibit hazing in their codes of conduct, form anti-hazing committees, and provide students with educational materials about hazing. Although no comparable statute applies to K-12 districts, RCW 28A.600.477(4) requires that the training class for a district's HIB compliance officer "include materials related to hazing."

²⁷ College fraternities are notorious for hazing incidents, often involving excessive or even fatal levels of alcohol consumption. [National Hazing Study: Hazing in View | StopHazing | Elizabeth Allan](#)

that reportedly occurred. As noted by SafeSport, teenaged athletes develop competitive cultures that can lead to hazing:

Participating in sport can lead to positive character development. Competition, peer influence, and the pressure to improve all help athletes learn and grow. But these are the same cultural dynamics that can breed bullying. There is a fine line between peer influence and peer pressure; between gaining responsibility and taking advantage of unfair power dynamics; between playful team bonding and teasing; and between peer feedback and targeted criticism. Common elements of sport culture can cross quickly into harmful behavior.²⁸

Accordingly, even if true “hazing” did not occur in these instances, there could still be a risk of it occurring within the district’s athletics programs in the future.

The first step in developing an anti-hazing program is to define the behavior as distinct from bullying or harassment. Below is sample anti-bullying and anti-hazing language the district could adopt as part of its code of conduct for extracurricular activities, which also addresses unwanted physical contact:

I understand that hazing is an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them, regardless of a person’s willingness to participate. As an athlete or participant in an extra-curricular activity, I will not bully or haze other participants. I will not subject others to unwelcome physical contact. I will not stand by and observe bullying or hazing or encourage others to bully or haze. I understand that I have the right to say no to unwanted physical contact or if someone tries to coerce or force me into doing something harmful. If I experience or witness any bullying, hazing, or unwanted physical contact, or learn that it has occurred, I will promptly report it to my coach, club advisor, or other responsible adult.

Adding a provision like this could be more than just a semantic change; it could empower students to recognize hazing and understand that they should not tolerate it. Hazing researchers have noted, “A gap exists between student experiences of hazing and their willingness to label it.”²⁹ A precise definition could also send the message that hazing—along with any assaultive or bullying behavior—is unacceptable and should be reported, despite peer pressure to participate or stay silent.

As noted, school districts do not have an obligation to supervise high school students continuously or at all times, and it is not feasible to do so. If students are empowered to

²⁸ [Could my kid be the bully? | U.S. Center for SafeSport](#)

²⁹ [Updated hazing survey - College of Education and Human Development - University of Maine](#)

recognize and report bullying and hazing, that effectively provides an extra layer of supervision, even when adults are not present. Watchful students can be an extra set of “eyes and ears” for the coaches.

If the district does amend its policies to address hazing, the district should train staff, administrators, and coaches to identify hazing and respond appropriately to reports of it. StopHazing.org offers copious free resources for training.

As part of an anti-hazing program, students should also be trained in hazing recognition and prevention. Institutions that have adopted anti-hazing programs have generally found it more effective to have students educate fellow students.³⁰ To this end, the district could form athletic leadership teams consisting of senior athletes and team captains to help educate players. The student leaders could create training materials and deliver them at pre-season meetings. The message need not be overly long or extensive to be effective; the student leaders just need to believe in the message and sell it to their peers.

Finally, developing student leaders and an anti-hazing program could help establish a more supportive culture for athletics and extracurricular activities. It could help students understand that positive attributes like leadership and teamwork are the antithesis of bullying and hazing. That could help to minimize cliques, gossip, and other acts that exclude fellow athletes and damage team culture.

RECOMMENDED TRAINING

Assuming the district adopts policy and program changes, the administration should ensure that administrators, athletic directors, and coaches have additional relevant training. The district already requires staff, including coaches, to complete training on child abuse reporting, student discipline, bullying recognition and response, sports supervision and safety, Title IX, and boundary invasions. However, much of the training is completed online through a private vendor and is of variable depth and quality.

³⁰ After a notorious sexual assault of high school lacrosse players by their teammates in Maryland, the affected school district hired a law firm to review district policies and conduct focus groups. The law firm’s [report](#) states:

According to the students we spoke with, training was most successful if it involved student participation or student speakers, as opposed to PowerPoints presented by administrators. One way to achieve higher student engagement would be to start with a group presentation to all teams and student groups, followed by breakout team- and activity-specific sessions where coaches or teachers lead discussions about hazing.

See also [Hazing-Prevention-Action-Guide-Slide-Deck-2021.pptx](#) (recommending the creation of a Student Athlete Leadership Council to develop interactive, student-led training on hazing, bullying, and harassment).

Assuming the district amends its policies in accordance with the above suggestions, amendments will only be effective if staff receive training in how to implement the changes. Stand-alone trainings, preferably conducted by the district's legal counsel, are the best way to emphasize fundamentals. If feasible, district leadership could schedule professional development days, or set additional training days, to roll out the changes and emphasize their importance. Training could be especially helpful in the following areas:

Sexual harassment investigations. Stand-alone training could cover the basic definition of sexual harassment and assault and emphasize that allegations of a potentially sexual nature require referral to the Title IX coordinator and a prompt investigation by a professional with appropriate expertise.

Child abuse reporting. Perhaps needless to say, given what was reported in the media, the district might require its employees to attend standalone training on child abuse reporting on a district-wide basis.

Student conduct and discipline. In conjunction with the adoption of new student conduct codes, school administrators may benefit from refresher training on student discipline, including an in-depth overview of the new conduct rules and the procedures for imposing suspensions, emergency removals, and expulsions.

Code of conduct for extracurricular activities. Assuming the district adopts a new code of conduct for extracurricular activities—which includes the above-proposed anti-hazing and supervision language—all staff involved in coaching and advising students in activities should receive training on how to introduce, educate, and implement the new code.

Locker room supervision. If the district develops supervision plans as referenced above, coaches, athletic directors, building administrators, and teachers should be trained in providing appropriate supervision under the new protocols. It may also be helpful to train student leaders, such as team captains.

Anti-hazing program. If an anti-hazing program is adopted, staff involved in extracurricular activities should receive training on the definitions and protocols. Student leaders should also receive training, so that they may educate their peers.

CONCLUSION

As set forth in this report, my review demonstrated that the district could better position itself to protect students, and to avoid future incidents of assaultive conduct, by amending key policies and procedures. The district might also develop protocols for supervising locker rooms; in doing so, the administration should work with building-level

Ms. Patti Bowen
July 27, 2026
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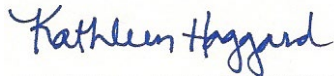
staff to make sure supervision requirements are realistic and achievable, and that they account for building architecture and other relevant factors.

Given the concerning allegation that other students observed or participated in the reported misconduct, the district may benefit from adopting a program that prohibits hazing and utilizes student leaders as educators. The administration should bear in mind that students are a key piece of the puzzle when it comes to keeping their classmates and teammates safe. Finally, for whatever new policies and protocols the district chooses to adopt, it should ensure that administrators, along with building staff, where appropriate, receive additional relevant training.

If you have any questions or need additional information, please let me know.

Sincerely,

HAGGARD & GANSON LLP

A handwritten signature in blue ink that reads "Kathleen Haggard". The signature is written in a cursive style with a horizontal line underneath.

Kathleen Haggard