



Title VI Coordinator Training: Understanding Law, Policy, & Compliance

2025

TITLE IX
UNIVERSITY

PRESENTED BY INSTITUTIONAL COMPLIANCE SOLUTIONS



About Us

OUR MISSION

To provide the best Care and Support for our clients, Community Partners, employees, contractors, collaborators, vendors, and all others who encounter our company.

GOAL

To assist schools and districts in providing a safe and healthy learning and working environment for students, faculty and staff.



Betsy Smith
Chief Innovation Officer



Courtney Bullard
CEO



Celeste Bradley
Chief Solutions Officer



Amy Buck
Senior Title IX & Equity
Specialist/Attorney



Lindsay Hatzis
Title IX & Equity Specialist/Attorney



Tawny Alonzo
Title IX & Equity Specialist



Kelsey Baker
Case Manager



Brittany Gates
Title IX & Equity Specialist



Erica D'Agostino
Title IX & Equity Specialist



Jocelyne Woodall
Title IX & Equity Investigator



Housekeeping

- ✓ Not Recording
- ✓ Not Legal Advice
- ✓ Course Materials
- ✓ Breaks

Agenda



Overview of Civil Rights
Laws



Building a Title VI
Compliance Program



Policy Development



Triaging and Planning



Data Monitoring



Sustainable Compliance



Q&A

REALITIES:

- ✓ Being asked to do more with less
- ✓ Compliance is ever expanding
- ✓ Expectations of community
- ✓ Increase in reporting
- ✓ Rapid speed of this administration



WHY TITLE VI MATTERS NOW



Surge in federal investigations and enforcement



Funding and compliance stakes are rising actions



Connection between legal obligations and school climate

2025 Resolved OCR Matters

*Note-- updated 9-23-2025
155 resolutions
Majority Elementary and Secondary

● Disability

- 89 - Vast majority involve allegations of discrimination based on disability

● Title VI

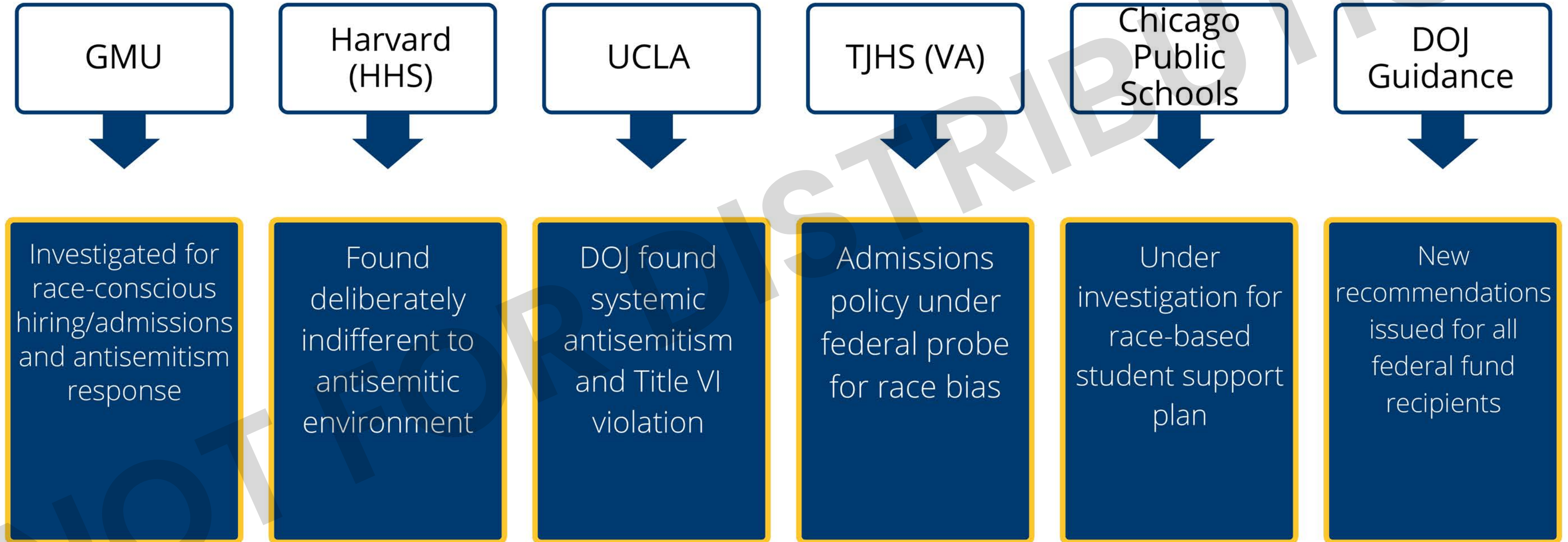
- 30 cases involve Title VI

● Title IX

- 36 Sex Discrimination



State of Events



RISKS OF NON-COMPLIANCE



Potential loss of federal funding



Reputational and legal exposure



Harm to student trust and campus safety



Overview of The Laws





INSTITUTIONAL COMPLIANCE
SOLUTIONS

COMPLIANCE CUL-DE-SAC

TITLE VI



TITLE IX



ADA



TITLE VII



504/IDEA

New Message

To Mrs. Jones

Subject Complaint

My daughter was in history class at Pinnacle Middle School yesterday when the boy next to her pulled her hijab back and asked if her dad was a terrorist. This has been an issue with this kid since last year when he kept asking her if she celebrated 9/11. We complained then, and nothing happened. We are sick of this and want to know what you all are doing about this issue.

Send



New Message

To HR Complaint Email

Subject Complaint

My coworker, John, has made work a living hell for me. He constantly heats up fish in the microwave (which makes me want to be sick, plus I'm a vegetarian), but he also makes jokes about women and Mexicans. He makes comments about ICE and tries to scare people about coming to work. Estrella, who sits next me, cries and says she can't take his jokes anymore. Can you look into this?

Send





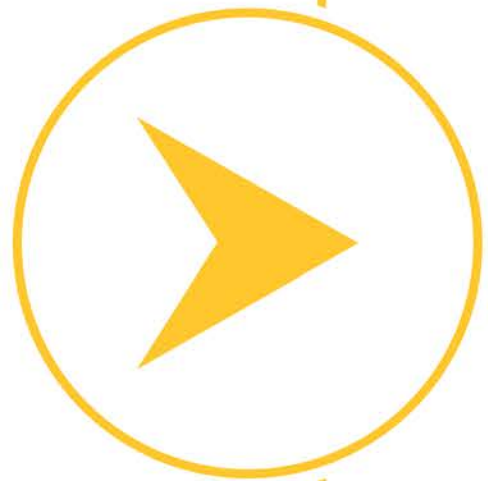
Understanding Title VI *Enforced by Office for Civil Rights*



Understanding Discrimination Under Title VI

Title VI of the 1964 Civil Rights Act says,
"No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

42 U.S.C. § 2000d





Access



What Activities are Protected Under Title VI?

Programs and activities that receive education funds must operate in a non-discriminatory manner which include:

- Admissions
- Recruitment
- Financial Aid
- Academic Programs
- Counseling and Guidance
- Vocational Education
- Student Treatment and Services

Protected Activities Continued...

Discipline

Physical Education

Classroom Assignment

Athletics

Grading

Housing

Recreation

Harassment creates a hostile environment when the conduct is objectively **offensive and sufficiently severe or pervasive** so as to interfere with or limit an individual's ability to participate in or benefit from a recipient's program.



TITLE VI CASES

OCR determines a Hostile Environment if:

- (1) harassment based on race, color, or national origin existed;
- (2) the recipient had actual or constructive notice of the harassment; and
- (3) the recipient failed to respond adequately to redress the hostile environment.

Discriminatory Treatment

Harassment/Hostile
Environment



TITLE VI CASES

Baltimore City Public Schools

- Alleged BCPS allowed “egregious and persistent discrimination” against Jewish students by students and teachers.
 - BCPS still employs a teacher who threatened to ‘go all Nazi’ on his students and directed Nazi salutes towards a Jewish Student.
 - Students drew swastikas on desks and textbooks with few consequences to perpetrators.
 - The complaint details how Jewish students have been forced to isolate themselves, drop classes, eat lunch alone, and hide their Jewish identities to avoid harassment. When parents requested concrete action plans and educational programming on antisemitism, schools offered inadequate responses or ignored their pleas entirely.



Brown University Resolution Agreement

Regarding Antisemitism

Facts: The investigation found that the university received around 75 reports of alleged antisemitic, anti-Palestinian, and anti-Muslim harassment against students from October 2023 through late March 2024, including allegations of students pointing at a Jewish classmate's Star of David jewelry and yelling an ethnicity-based insult, a student berating a Palestinian-American roommate about their identity, and students blocking a Jewish classmate from attending a pro-Palestinian rally.

Outcome: OCR concluded that the university did not comply with Title VI by failing to properly investigate whether these and other reported incidents created a hostile environment for students, faculty, or staff under Title VI.

Offering informal resolution was not enough, and just because a Complainant may have been unresponsive did not relieve the University of its obligation to investigate whether a hostile environment had been created.

OCR cited to similar agreements reached with Park City, Utah School District and University of Michigan, which included deficiencies in:

1. Record keeping requirements
2. Failing to take timely steps to prevent and address race-based concerns
3. The multiple reports received constituted repeated actual notice of harassment.



Terms of Brown University, University of Michigan, and Park City Utah School District's OCR Resolution Agreements:

1. Revising policies and procedures to ensure all offices comply with Title VI;
2. Notifying all students, employees, and parents about Title VI prohibitions and protections against discrimination and how to report harassment;
3. Conducting annual training on nondiscrimination and harassment for all students and employees;
4. Consistently maintaining records related to complaints or reports of discrimination under Title VI;
5. Conducting a review of their responses to complaints and taking remedial actions when required;
6. Conducting climate surveys focused on Title VI discrimination for all students and employees; and
7. Analyzing and creating action plans in response to climate surveys focused on Title VI discrimination.

OCR has developed a Shared Ancestry or Ethnic Characteristics website, *which can be found here:*



Discrimination Based on Shared Ancestry or Ethnic Characteristics

Find policy guidance, case resolutions, publications, and other resources pertaining to Title VI and discrimination based on shared ancestry or ethnic characteristics.

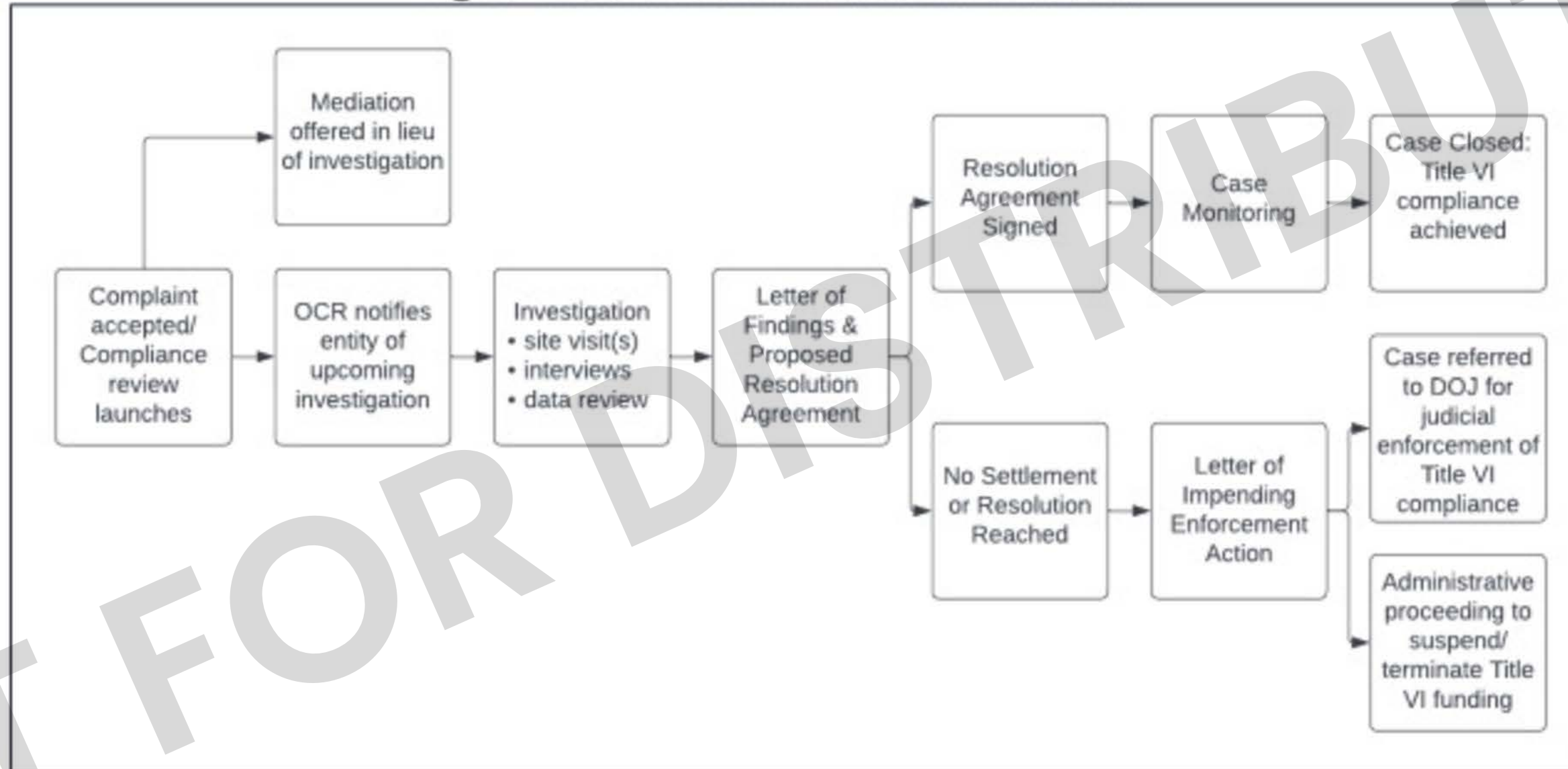


©Institutional Compliance Solutions 2025 All Rights Reserved



Figure 1 is a flowchart illustrating the entire OCR enforcement process.

Figure 1. OCR Title VI Enforcement Process



Note: The entity under investigation may request to settle the matter by entering into a Resolution Agreement at any time prior to the conclusion of the investigation.

HYPOTHESIS

Sarah is an American history teacher at ICS High School. During a history lesson on World War II, some students who heard Sarah is Jewish, started asking her “what’s your number?,” referencing the numbers assigned to those placed in concentration camps.

Sarah continued her lesson, but soon reported this behavior to her principal, stating that she felt really uncomfortable with how the students treated her. The Principal told her that teachers should be able to brush off these kinds of things because they are the adults in the situation.

Sarah reports that she feels unsupported by her principal and that he has not taken her concerns of discrimination seriously enough.



Understanding Title VII

Enforced by EEOC

Title VII Prohibits Employment Discrimination based on:



GENDER
IDENTITY

MENTAL OR
PHYSICAL
DISABILITY

AGE

COLOR

SEXUAL
ORIENTATION

RELIGION

PREGNANCY

NATIONAL
ORIGIN

SEX

RACE

IMMIGRATION
STATUS

VETERAN
STATUS

Who is covered by Title VII of the Civil Rights Act?



☒ Private & public sector employers w/15 or more workers

☒ State and local governmental agencies

☒ Employment agencies

☒ Apprenticeship programs

Not Covered: Federal employees or independent contractors. However, federal employees are protected against discrimination by other federal anti-discrimination laws.

What Individuals are Protected from Discrimination Under Title VII?



Applicants



Former
Employees



Employees



Title VII Case:

Brownsburg school had a policy that students could go by their preferred names and pronouns. Kluge said his religious beliefs would not allow him to do this so he referred to students by their last names. He said he was eventually pushed out of his job and filed a Title VII religion claim, failure to accommodate. Previously, Courts used “more than de minimus” standard.

Now, must be a substantial hardship (measurable and documented) so jury gets to decide.

HYPOTHESIS

Sam, a tenured Professor, emailed the Department Chair about his recent anxiety diagnosis and asked for a reduced class size this semester as a medical accommodation. The Department Chair denied his request and said, "We all are stressed! Sorry, but if I did this for you, I wouldn't have any professors here."

Sam escalates his complaint to the Compliance Officer and asks for help.

FREE SPEECH OR HARASSMENT???

OCR STRESSES THE NEED FOR CLEAR POLICIES THAT DISTINGUISH BETWEEN PROTECTED SPEECH AND HARASSMENT.

INSTITUTIONS MUST ALSO ASSESS THE CONTEXT AND IMPACT OF PROVOCATIVE SPEECH.

PROTECTED SPEECH CAN CREATE A HOSTILE ENVIRONMENT IF IT TARGETS INDIVIDUALS BASED ON RACE, ETHNICITY, OR NATIONAL ORIGIN.





The fact that harassment may involve conduct that includes speech in a public setting or speech that is also motivated by political or religious beliefs does not relieve a school of its obligation to respond under Title VI if the harassment creates a hostile environment in school for a student or students.



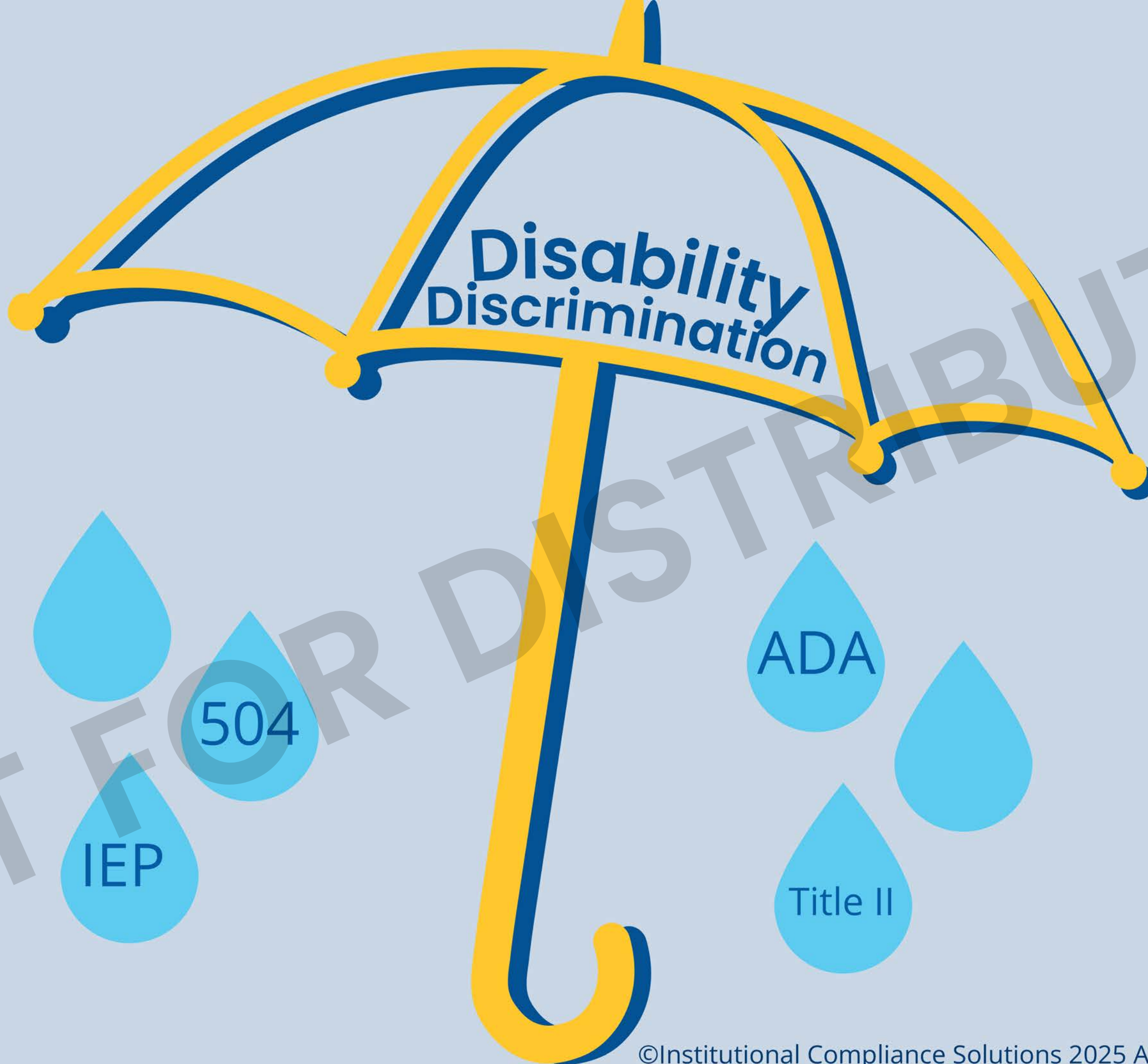
Americans with Disabilities Act

*Enforced by the
Department of Justice*



ADA

AMERICANS WITH
DISABILITIES ACT





The Americans with Disabilities Act (ADA) of 1990 prohibits discrimination solely on the basis of disability in employment, public services, and accommodations. The person must otherwise be qualified for the program, service or job.

Discrimination Based on Disability



Section 504

Section 504 of the Rehabilitation Act of 1973 prohibits any school district receiving federal financial assistance from discriminating against disabled children.

Requires Free
Appropriate Public
Education



Title II

Title II of the Americans with Disabilities Act of 1990 expands these protections and prohibits all school districts, whether they receive federal funding or not, from discriminating against disabled children.



Accommodations

The ADA requires the provision of reasonable effective accommodations for eligible faculty, staff, students, and visitors across an institution's programs, activities, and services.

The ADA defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activity:

- Walking
- Speaking
- Talking
- Breathing
- Thinking
- Hearing



Accommodations

One aim of the ADA was to make educational institutions more accessible for the disabled. This aim covers “reasonable accommodations” such as the following:

- Modification of schedules
- Allowing employees to receive written instructions
- Modification of breaks/shifts
- Extra time allotted for breaks/lunch
- Interpreters
- Specialized computer equipment
- Lighting changes
- Extra monitors

INTERACTIVE PROCESS UNDER ADA

REPORT OF A DISABILITY THAT
IMPACTS ABILITY TO PERFORM JOB



MEETING WITH HR TO CONDUCT
INITIAL ASSESSMENT

IS REQUEST REASONABLE?



NEED FOR BRAINSTORMING
ALTERNATIVE ACCOMMODATIONS

IMPLEMENT ACCOMMODATION,
IF REASONABLE



CONTINUE INTERACTIVE PROCESS
UNTIL EXHAUSTED OPTIONS



DOCUMENT!! DOCUMENT!! DOCUMENT!!



Recent Cases Under the ADA:

- For 2025, there were 68 disability discrimination cases for K-12 schools.
 - OK- denied access to handicap parking spaces
 - CO- Failed to implement 504 plan by not allowing student to move around class; not allowing computers in class for dictation; and not performing frequent check-ins.
 - FL- The Complainant further alleged that after she communicated concerns to the District regarding the implementation of the Student's educational plans, the District retaliated against the Student by not providing his accommodations, and the District left the Student off of a school-wide classroom reporting list for testing.

Don't
Forget!

State Laws!



INSTITUTIONAL COMPLIANCE
SOLUTIONS

COMPLIANCE CUL-DE-SAC

TITLE VI



TITLE IX



ADA



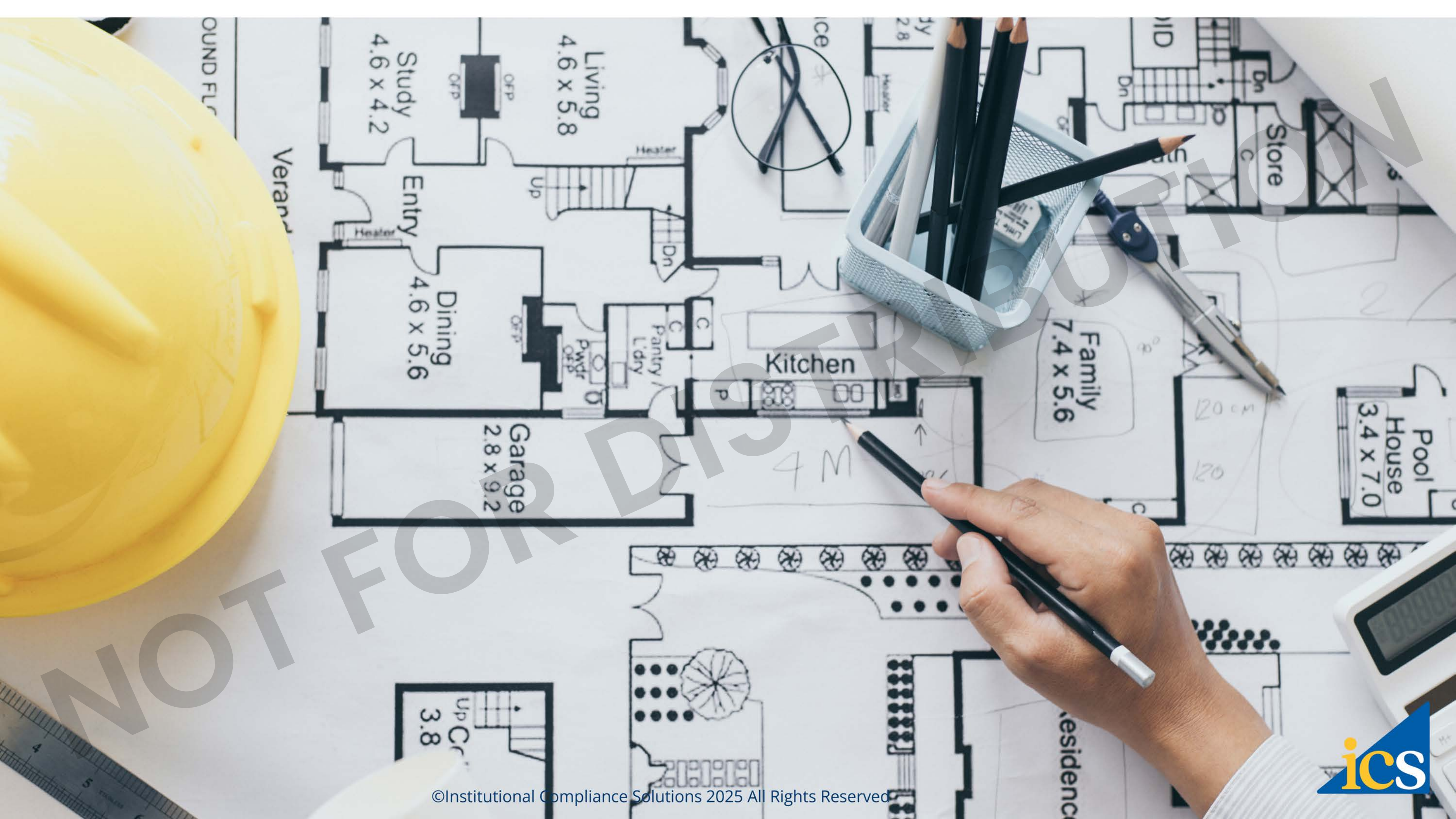
TITLE VII



504/IDEA

The House of Title VI





A photograph of two women sitting on a grey sofa in a modern office setting. The woman on the left is Black, wearing a light green long-sleeved shirt and pink pants, looking towards the other woman. The woman on the right is white, wearing a white button-down shirt and a blue skirt, holding a pen and looking at a notebook. A small round wooden table with a black cup sits between them. A large potted plant is in the background.

Support

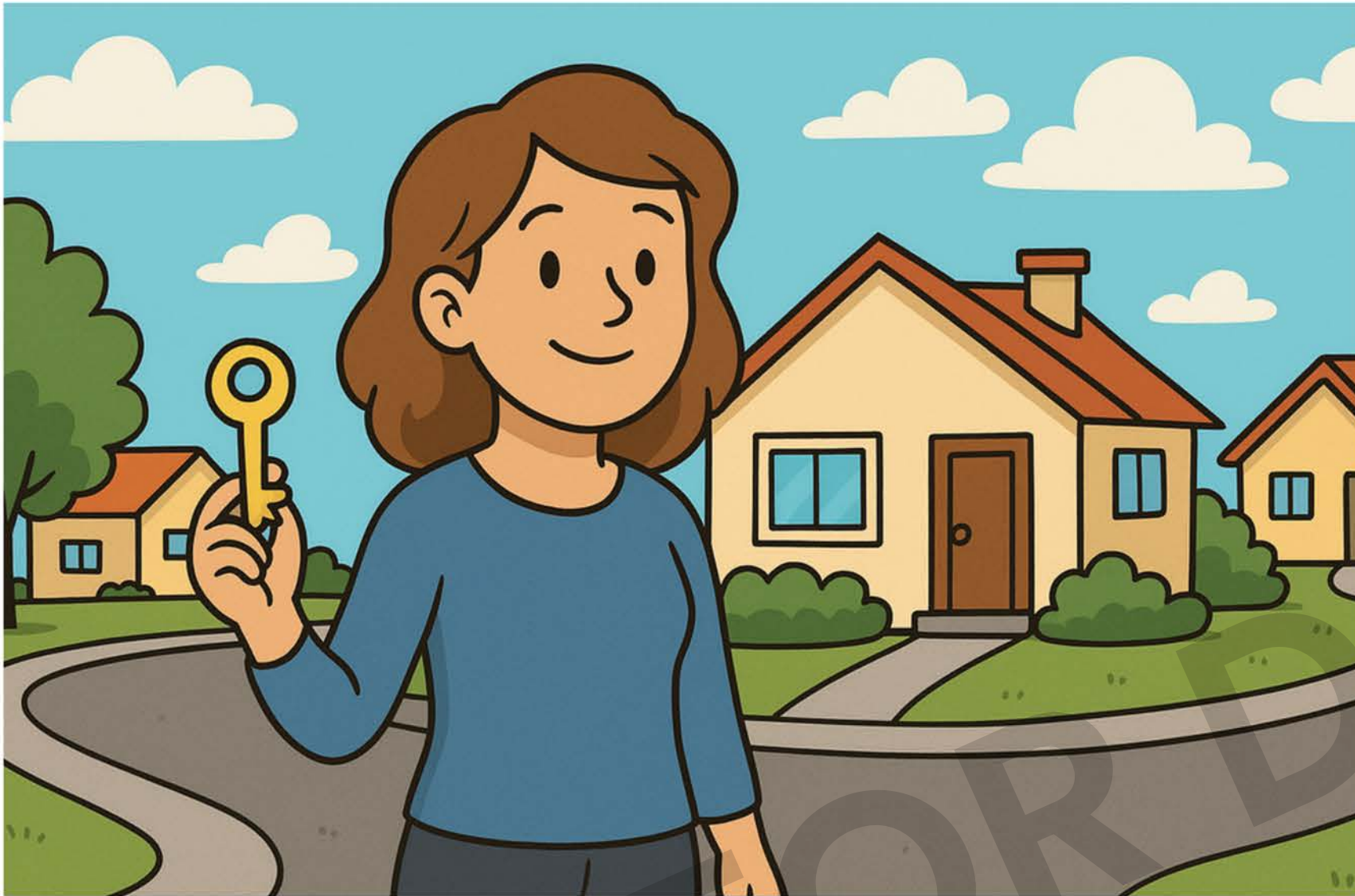
A photograph of a woman in a green cardigan and black pants standing and pointing at a whiteboard with a blue marker. She is facing a group of people, of whom only the back of one person's head in a red shirt is visible in the foreground. The whiteboard has some papers pinned to it.

Access

Compliance + Compassion

**Compliance is ineffective without compassion.
Every decision you make...should begin with
compassion.**

- **Impact > Intent**



You own the house



It's a big responsibility



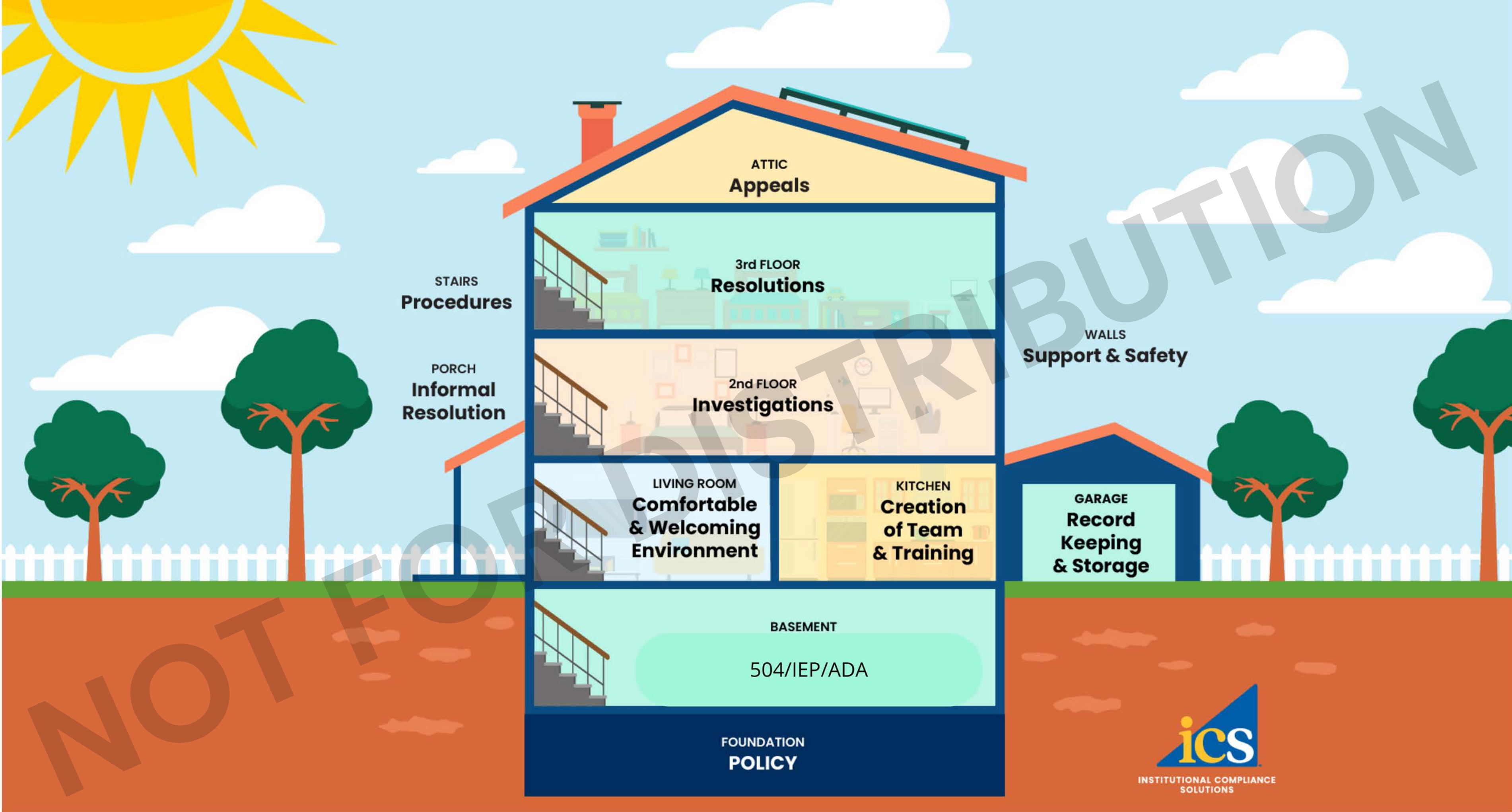
Accept help and support



Identifying & addressing problems is key...Patience is a virtue



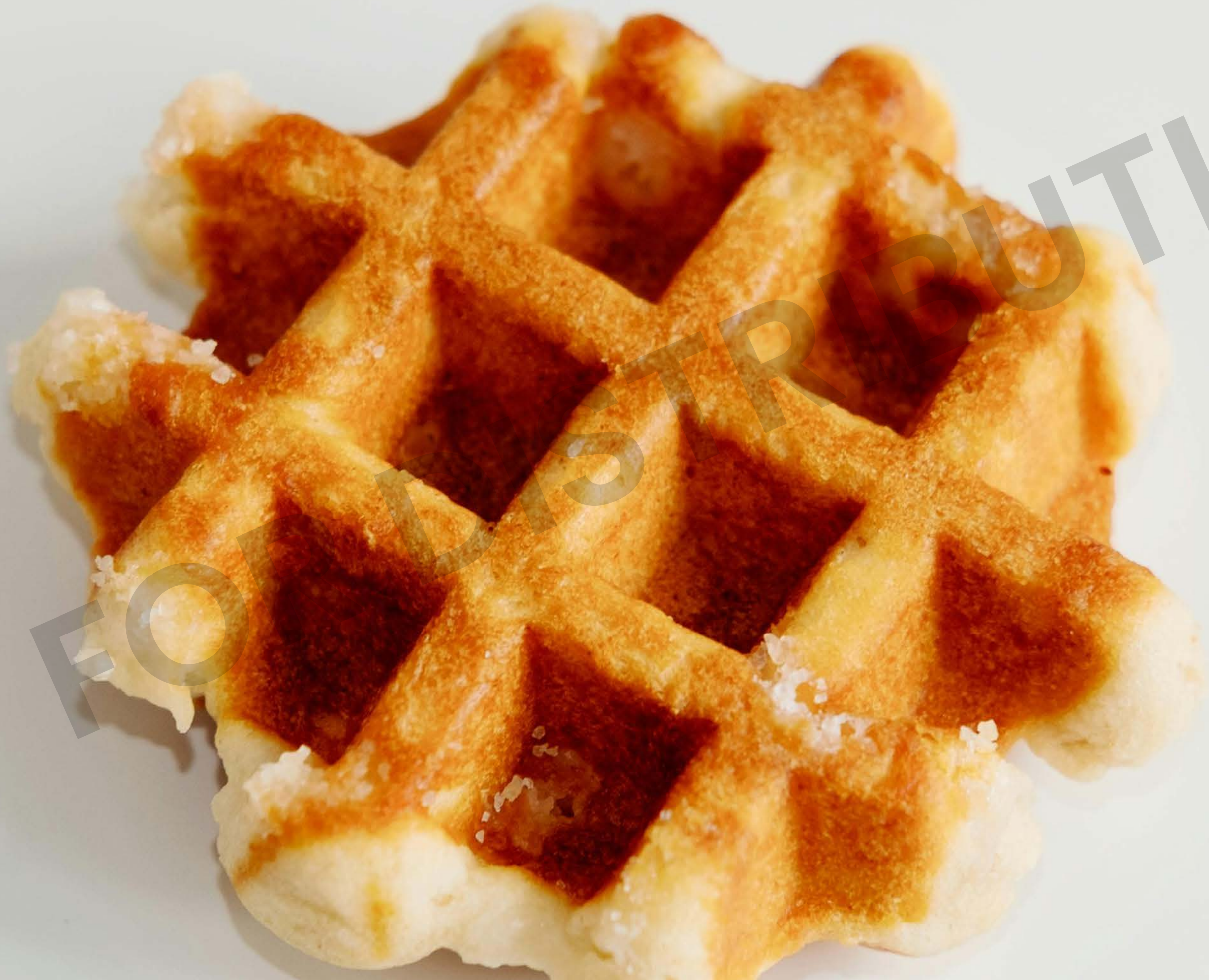
Intentional upkeep is necessary





**What you don't
know doesn't
HELP you...**





Where is my policy?

Search...



NOT FOR DISTRIBUTION

Foundation/Policy

01

Clear

02

Concise

03

Consistent

04

Accessible

FOUNDATION
POLICY

☐ Scope

☐ Definitions

☐ Examples

☐ Procedures

FOUNDATION POLICY

Title VI, 42 U.S.C. § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Title VI prohibits discrimination, including harassment, based on a student's actual or perceived:

- shared ancestry or ethnic characteristics, or
- citizenship or residency in a country with a dominant religion or distinct religious identity

This includes discrimination, including harassment, based on the language spoken and limited English proficiency.

Title VI prohibits discrimination against students of any religion when the discrimination involves:

- racial, ethnic, or ancestral epithets, or slurs
- how a person or group looks, dresses, or speaks if linked to ethnicity or ancestry (e.g., skin color, facial features, attire/ style of dress, accent, name, language spoken)
- potentially or allegedly inherited traits
- stereotypes about people who share certain ancestral or ethnic characteristics

- **“Race”** includes hair texture, hair type, hair length, or a protective hairstyle, such as braids, locs, twists, tight coils or curls, cornrows, Bantu knots, afros, and headwraps, that is commonly or historically associated with race.
 - **“Sexual Orientation”** means an individual’s identity (or another person’s perception of their identity), in relation to the gender(s) to which the individual is sexually or emotionally attracted and the behavior or social affiliation that may result from the attraction.
 - **“Gender Expression”** means an individual’s way of reflecting and expressing gender to the outside world, typically demonstrated through appearance, dress, and behavior.
 - **“Gender identity”** means an individual’s innate sense of the individual’s own gender, which may or may not correspond with the individual’s sex assigned at birth.
- **“Harassment”** is any unwelcome, physical or verbal conduct or any written, graphic, or visual communication directed at a student, employee, applicant, or member of the public based on their protected class that is objectively offensive to a reasonable individual who is a member of the same protected class, that also:
 - for a student, is either made a term or condition of access to educational services, is used or threatened to be used as a basis for educational decisions affecting the student, interferes with a student’s ability to participate in the district’s educational services, or creates an intimidating, hostile, or offensive educational environment;
 - for an applicant or an employee, is subjectively offensive to the individual alleging harassment, is made a term or condition of employment, is used as a basis for employment decisions affecting the individual, unreasonably interferes with the individual’s work performance, or creates an intimidating, hostile, or offensive working environment;
 - for a member of the community, is subjectively offensive to the individual alleging harassment, and unreasonably interferes with a community member’s ability to participate in the district’s services, activities, or opportunities.

Whether conduct constitutes harassment depends on a number of factors, including, but not limited to:

- the type, frequency, and duration of the conduct;
- the number of individuals involved and their relationships;
- the age and education level of individuals involved;
- the location and context in which the conduct occurred;



Considerations

Where will the policy reside?

Who approves the policy?

Any Union considerations?

Socialize the Policy?



Stairs/Procedures

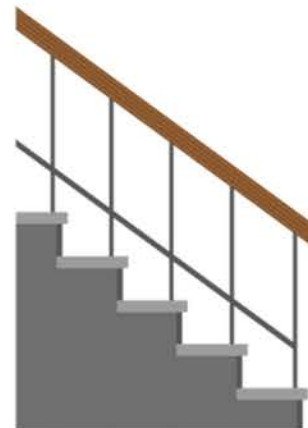


Written



Varying

STAIRS
Procedures



Communication

Where to report-
written?

Complaint and Notice

Investigation Process

Advisors

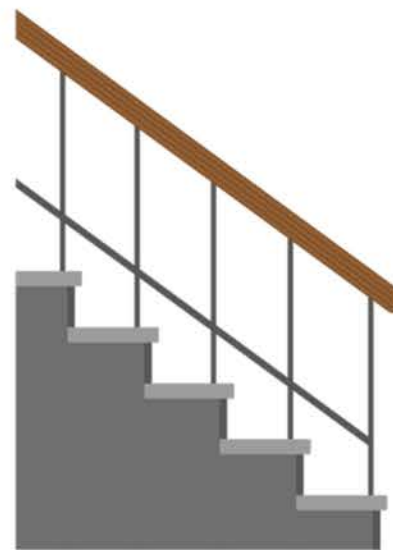
Standard of Review

Dissemination of
Report

**STAIRS
Procedures**

Sanctions

Informal
Resolution



Policy/Process Walk Through



Independent person

- Someone with no prior knowledge of the policy



Draw a flowchart

- Walk through the policy and write out what should happen...

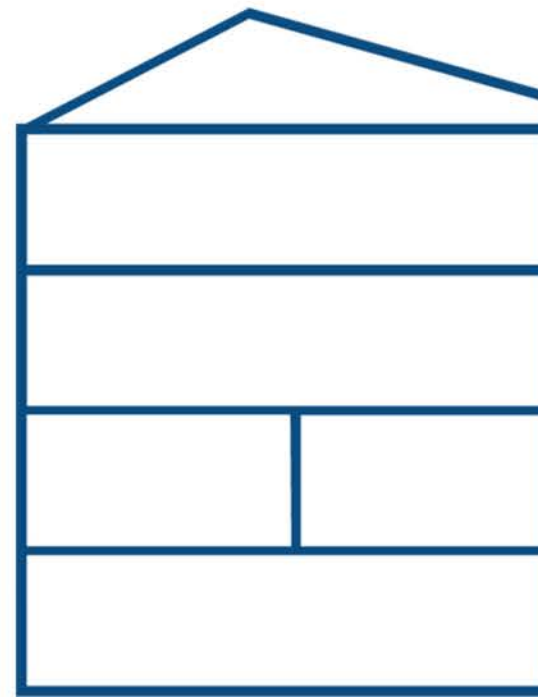
Walls/Safety & Support



FIRST



More than Physical

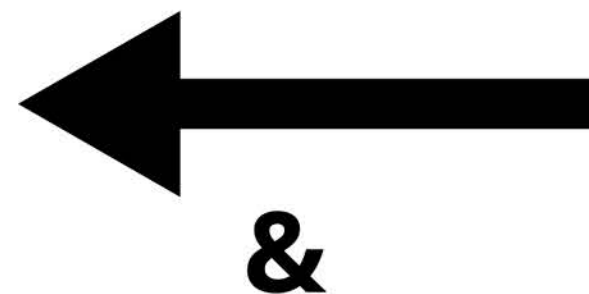


Evolving

INDIVIDUAL

COLLABORATE

PROCESSES



UNBIASED

EDUCATED ON
CURRENT
EVENTS

FOLLOW -UP

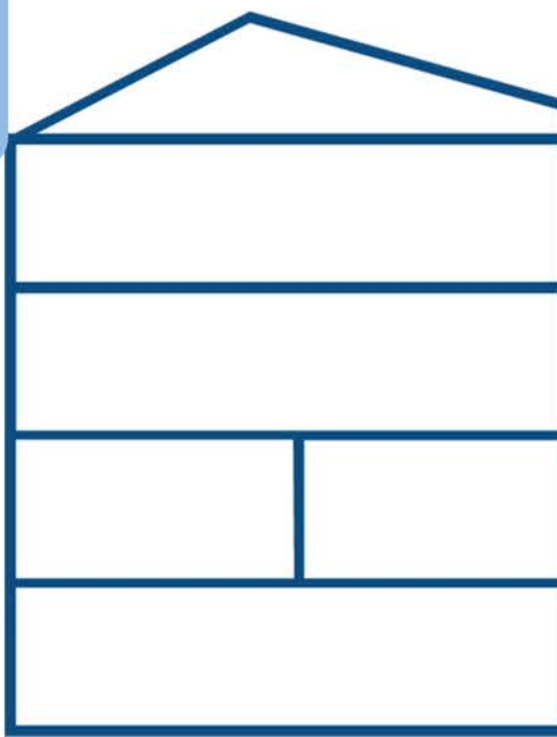
TRANSPARENT

PEOPLE



EMPATHETIC

CONFIDENTIAL



Walls

Compliance with Compassion



Basement: 504/IEP/ADA



No clear Policy

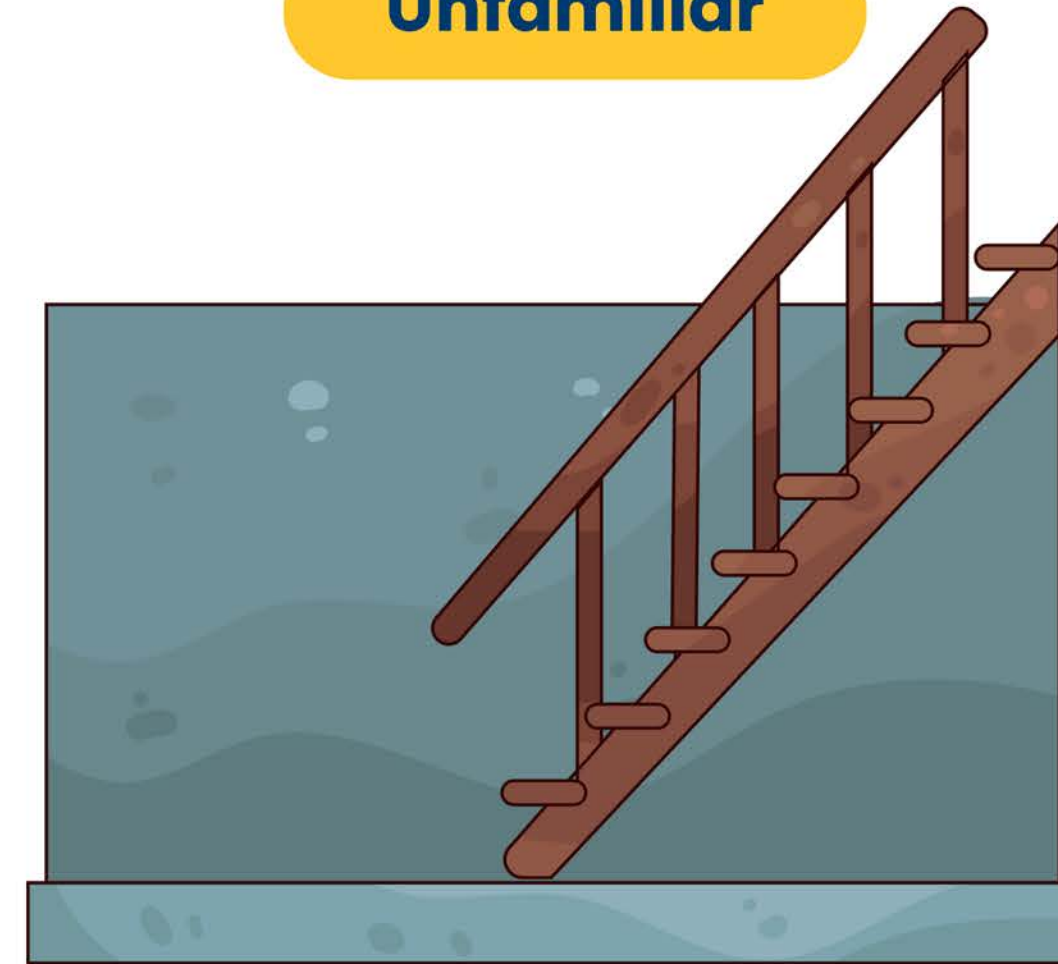


Accessibility



Unfamiliar

**Basement:
504/IEP/ADA**



Which office is
on first for a
report?

Is it clear to
students or
employees
how these
cases are
handled?

Does the Title
VI Coordinator
have a seat at
this table?

Are we going
to silo this
type of
report?

Employees
(faculty /staff)
versus
students in
resolution



**Basement:
504/IEP/ADA**



Kitchen/Team & Training



Humans



Resources/\$



Time



THE TEAM

- Title VI Coordinator
- Investigator
- Decisionmaker
- Informal Resolution Facilitator



THE TRAINING

- Title VI/VII
 - ADA/504/IEP
- ++
- Conflict of Interest/Bias
 - Leading with Compassion



Community Team



Students

- Students
- Clubs and organizations



Faculty/Staff

- Teachers/Principals/
District Employees
- Professors/Department
heads
- Student Life
- Facilities
- Athletics



Board of Education Board of Directors

- Interested and
connected community
members



External

- Parents
- Police Department
- Advocacy Groups
- Attorneys

How Can the Team Help?



- Review policy & procedures
- Conduct training
- Prevention efforts
- "Groups/Organizations"
- Reporting procedures for faculty and staff
- Conduct training for faculty
- Liaisons
- Your "billboard"
- Create and Review assessments
- Review the data for identifying "hot spots"

Living Room/Welcoming Environment

01

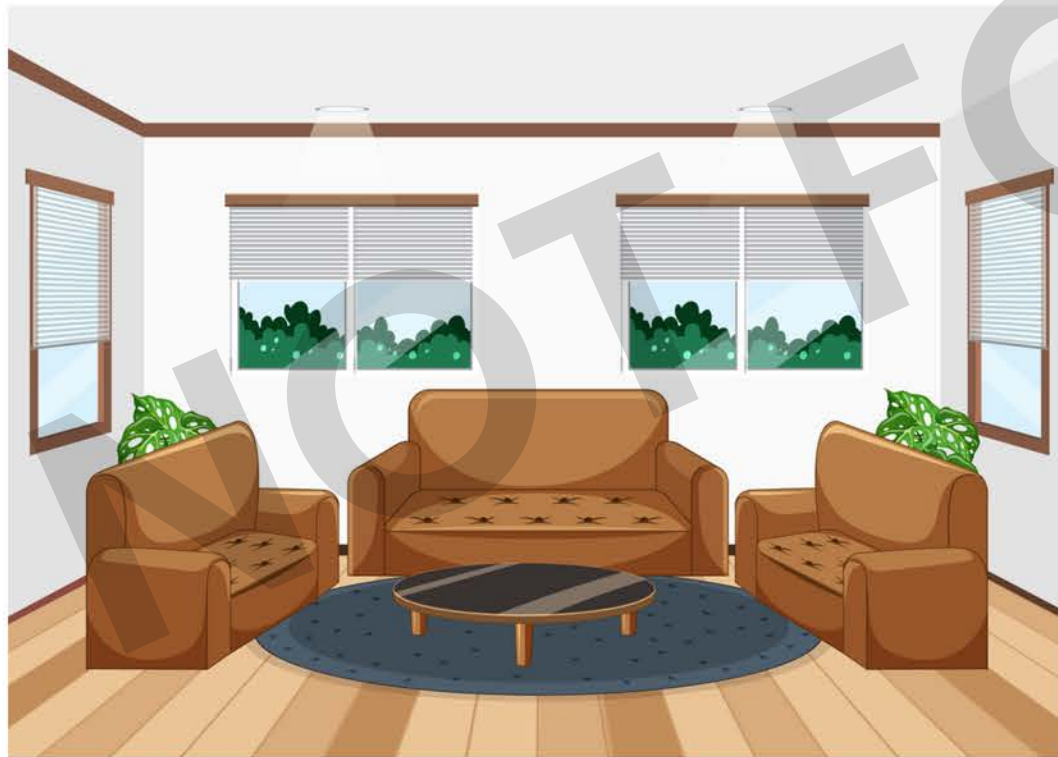
Space

02

Resources/\$

03

Topic/Tone



**Living Room:
Open and Inviting**

Accessibility-
Office location

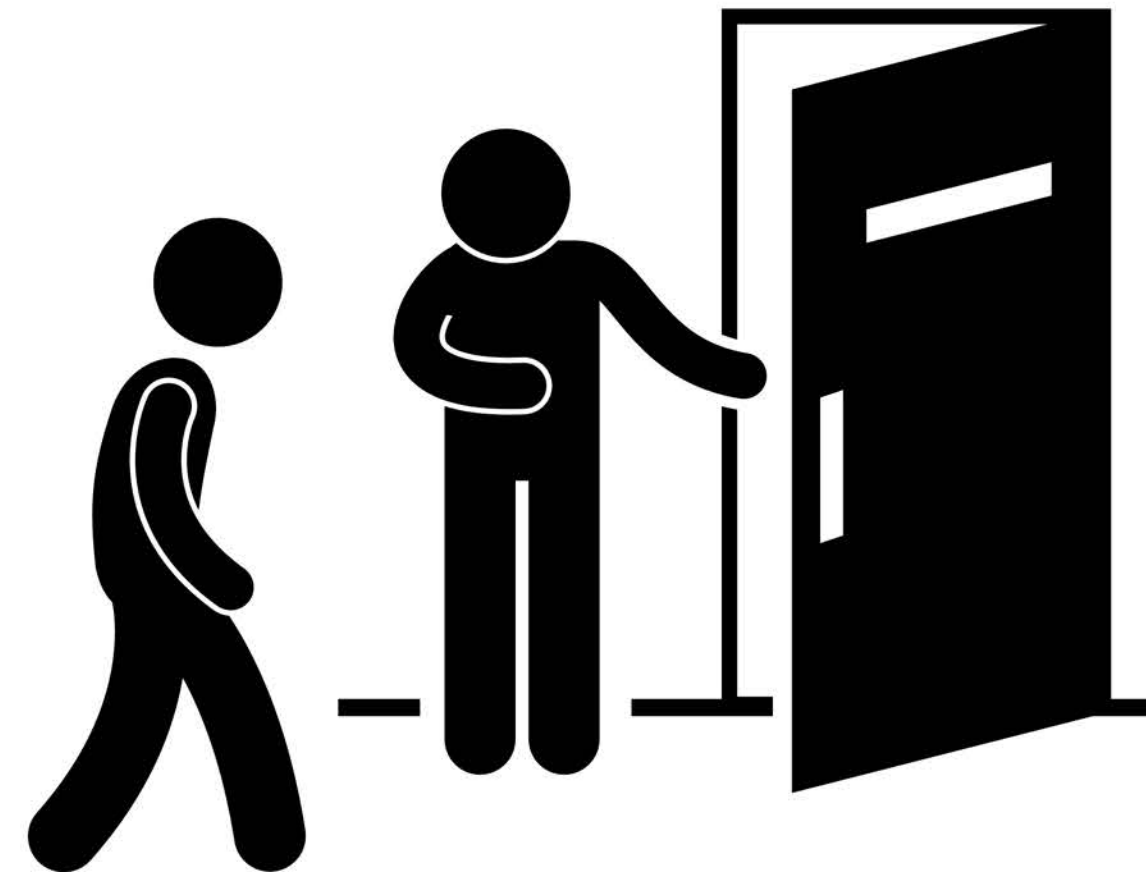
Does the
office allow for
a private
meeting
space?

Flexibility in
meetings and
approach

Online Comfort
- ease in
understanding
the process

Transparency
during the
entire process

**Living Room:
Open and Inviting**



2nd Floor/Investigations



Requirements



Empathy



Capacity



2nd FLOOR
Investigations

Notice of Investigations-inclusive

Scheduling considerations-
Parents, students, and employees

How to properly define the scope of your investigation.

Timeframes for conclusion of investigation



2nd Story: Investigations

3rd Floor/Resolutions



Advisors



Authority



Data Driven



Resolution Steps



1

**How to stop
discriminatory conduct**

2

**Educational
Component**

3

**Follow-up for
Compliance**

4

Tracking Mechanism

5

**Collaboration with other
departments**

Attic/Appeals or Final Determination

01

Policy Driven

02

EEOC/OCR

03

Authority

ATTIC
Appeals

Grounds for Appeal

Timeframe for Appeal

ATTIC
Appeals

Appellate Officer

Documentation
for external next
steps

Porch/Informal Resolution



Participation



Expectations

PORCH
**Informal
Resolution**



Time/Effort



Trained,
Neutral
Facilitators

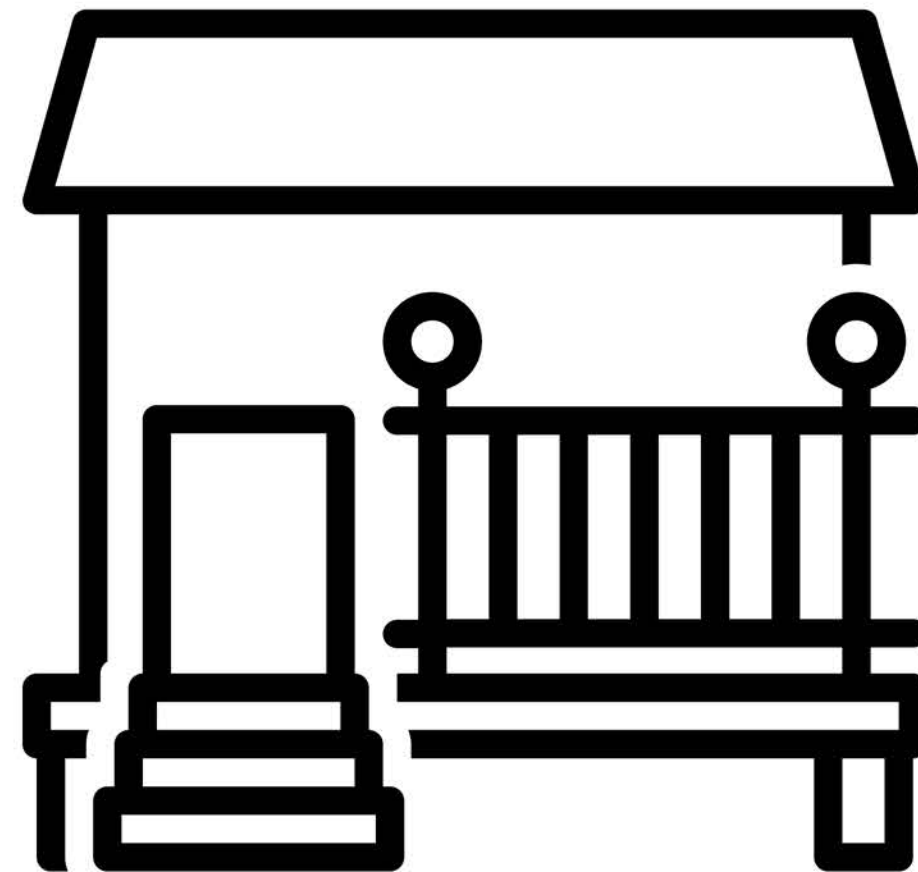
Length of time
in the IR
process

Flexibility in the
IR Process

Collaboration
with Internal
and External
Sources

Data
Collection

Porch:
Informal Resolutions



Garage/Record Keeping



Volume



Systems



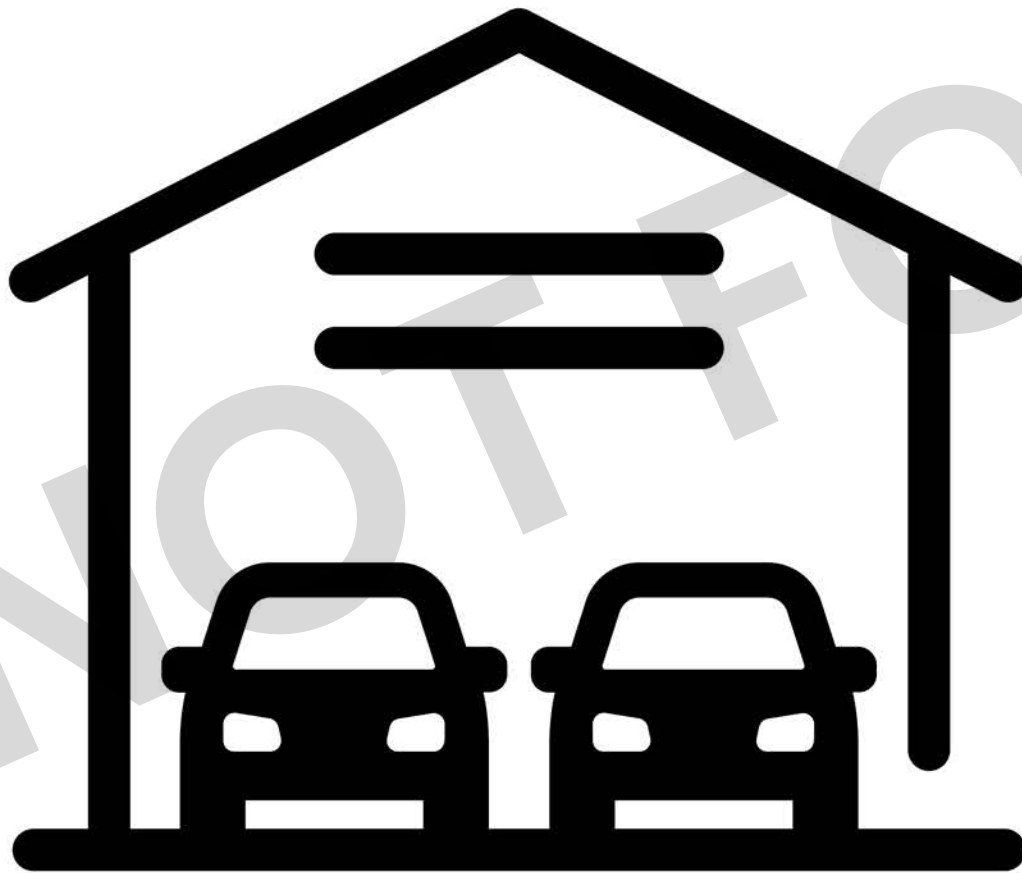
Turnover



Document
Retention
Policy Review

Sustainability

Continuity
between
houses



**Garage:
Record Keeping**







Ultimately
Pathway is
dictated by Policy,
and Policy is
impacted by Law



Who's On First?



Name: Jane Lucero

Date of Discrimination or

Harassment: Ongoing in the months of July and August 2025

Respondent: Gary Rogers

Summary of Incident: Mr. Rogers is my history professor and makes jokes about my nationality. It was more of joking comments before but has moved to more hateful comments. Most recently, he asked me if I was avoiding ICE because I had a new hairdo. He constantly talks with a Spanish accent around me and says I should learn to speak better English in his class. I would like to withdraw from this course.

Report of Discrimination

Notice of Investigation

- » IS YOUR PRACTICE TO SEND A NOI?
- » WHO DRAFTS IT AND SENDS IT OUT?
- » WHO RECEIVES IT?

NOTICE OF INVESTIGATION

Dear Mr. Rogers,

The Title VI Office has received a complaint alleging that you have engaged in behavior that violates the Non-Discrimination Policy. The allegation states that beginning August 13, 2025, you discriminated against Jane Lucero based on her national origin. Ms. Lucero specifically claims that she has been harassed by name calling and threats of calling ICE due to her national origin.

ICS takes reports of discrimination seriously as evidenced by our process for investigation and resolution of this alleged conduct. A copy of the entire policy and procedures can be found here at <https://www.addyourpolicy>.

An investigator will be assigned to investigate this allegation and will be in contact with you soon to set up a time for an investigation meeting. As provided within the Policy, you are permitted to bring an advisor to all meetings during this process. Please be aware that ICS has a non-retaliation policy and any concerns of retaliation will be investigated and subject to appropriate disciplinary action. Additionally, any complainant or third party who knowingly makes materially false charges alleging a violation of ICS's Policy in bad faith may be subject to appropriate disciplinary action.



The Magic Formula

Kindness

+

Transparency

+

Patience

FIGHT, FLIGHT, FREEZE, OR FAWN OR ALL FOUR...

OR SOMETHING COMPLETELY DIFFERENT...



Data Monitoring



What are the “Hot Spots”?

- Specific issue within the district or institution
- Rising number of complaints in certain area
- Review if complaints occur during noticeable times
- Employee issues higher under certain managers

Sustaining Compliance

● Trainings

- Quarterly at most
- Use their time wisely
- Establish those relationships for reporting

● Communication

- Updates from legal and outside entities
- Shared information internally

● Community

- Importance of reporting and transparency
- Build a culture of openness
- Regular evaluation of school climate and practices



Challenges

The work presents PLENTY of challenges... here are just a few

Respondent vs. Complainant

Imperative that you learn to work with both

Bias/Conflicts of Interest

Depending on size of institutions/districts

Pushback

The resources are not willing or able to provide the necessary assistance

DEI is Dead

Misunderstanding if Title VI or VII

Case Load

There is simply not enough time to adequately do the work

Never Enough

You cannot "fix" everything



NEXT STEPS FOR SCHOOLS

- Appoint or confirm Title VI Coordinator
- Review and update nondiscrimination policies and grievance procedures
- Ensure accessible reporting mechanisms
- Audit complaint responses and disciplinary processes
- Train! Train! Train!



**YOU'VE
GOT THIS!**





Help Us Help You



**Please fill out
the survey.**



