



TITLE VI COORDINATOR

Intermediate



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LESSON ONE

WELCOME



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AGENDA



- Lesson One** Welcome
- Lesson Two** Legal Updates
- Lesson Three** Overview of Civil Rights Laws
- Lesson Four** Building your Title VI House
- Lesson Five** Policy and Response
- Lesson Six** Additional Considerations
- Lesson Seven** Wrap Up & Final Assessment of Knowledge



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DISCLAIMERS:

- ☒ Not legal advice
- ☒ Cannot possibly cover everything



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OBJECTIVES:

- ✓ Understand Title VI Fundamentals
- ✓ Explore enforcement trends and legal updates
- ✓ Understand other civil rights laws
- ✓ Key takeaways and practical next steps



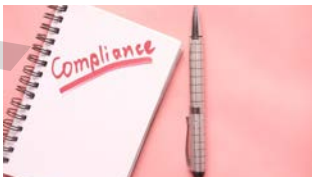
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WHY TITLE VI MATTERS NOW




Surge in federal investigations and enforcement




Funding and compliance stakes are rising actions




Connection between legal obligations and school climate




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RISKS OF NON-COMPLIANCE



Potential loss of federal funding



Reputational and legal exposure



Harm to student trust and campus safety



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SEE YOU IN LESSON 2!



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LESSON TWO

LEGAL UPDATES



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LEGAL LANDSCAPE



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2025 RESOLVED OCR MATTERS



Disability



Title VI



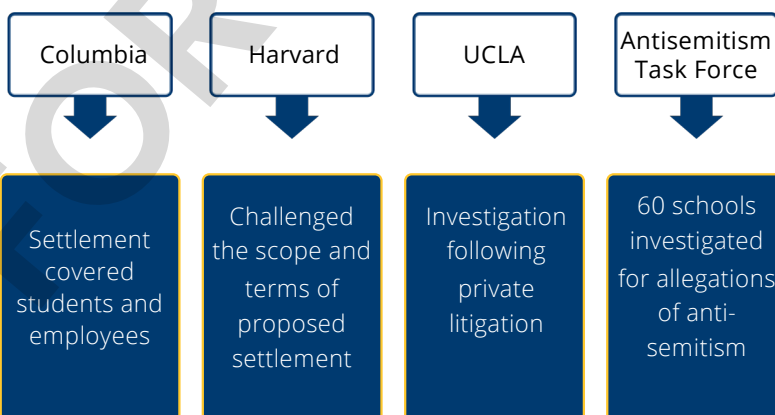
Title IX



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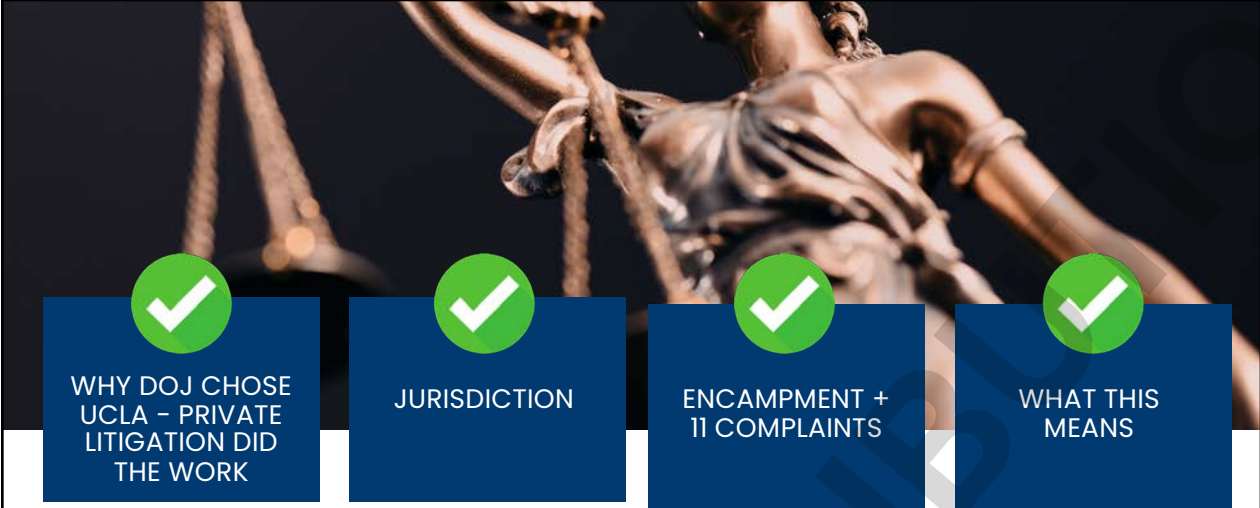
ANTISEMITISM



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WHY DOJ CHOSE
UCLA - PRIVATE
LITIGATION DID
THE WORK

JURISDICTION

ENCAMPMENT +
11 COMPLAINTS

WHAT THIS
MEANS

UCLA: DOJ INVESTIGATION



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SAME STATUTE/ DIFFERENT FOCUS



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DEI AND THE BONDY MEMO INTERPRETS SUPREME COURT DECISION

Students for Fair Admissions v. Harvard (2023)



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4 PILLARS OF THE BONDY MEMO

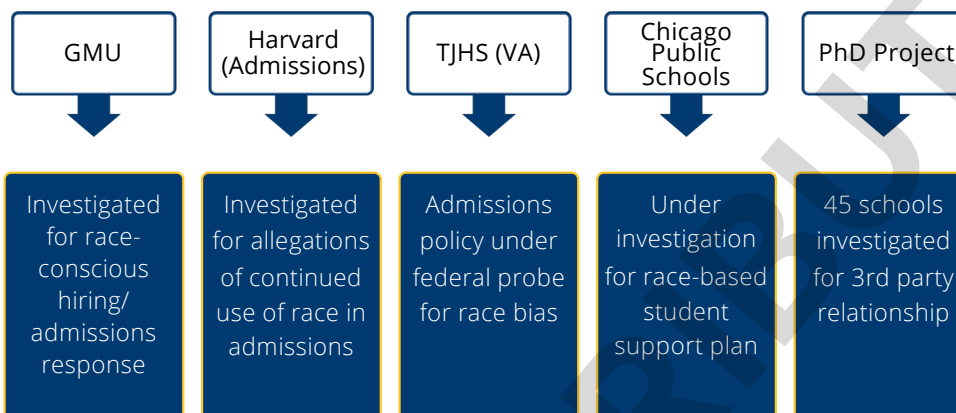


- ⚡ Prohibition on Protected Characteristics as Criteria
- ⚡ Proxy Discrimination
- ⚡ Third-Party Liability
- ⚡ Retaliation Protection

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DEI CASE STUDIES



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ACCESS



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SEE YOU IN LESSON 3!



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LESSON THREE

OVERVIEW OF CIVIL RIGHTS LAWS



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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

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UNDERSTANDING TITLE VI

Enforced by Office for Civil Rights



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WHAT ACTIVITIES ARE PROTECTED UNDER TITLE VI?

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

Admissions	Counseling and Guidance	Financial Aid	Grading
Vocational Education	Student Treatment and Services	Academic Programs	Physical Education
Recruitment		Discipline	Recreation
		Classroom Assignment	Athletics
			Housing



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Harassment creates a hostile environment when the conduct is 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.

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TITLE VI CASES

It is 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.

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DISCRIMINATORY TREATMENT

HARASSMENT/ HOSTILE ENVIRONMENT



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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.



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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:

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

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TERMS OF BROWN UNIVERSITY, UNIVERSITY OF MICHIGAN & PARK CITY UTAH SCHOOL DISTRICT'S OCR RESOLUTION AGREEMENTS:

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



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OCR HAS DEVELOPED A SHARED ANCESTRY OR ETHNIC CHARACTERISTICS WEBSITE

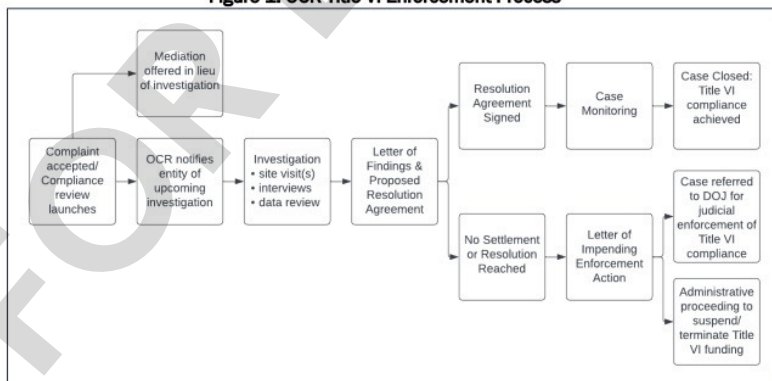


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Figure 1 is a flowchart illustrating the entire OCR enforcement process.

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.



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Note!!

Title VI is much broader than antisemitism alone. The law prohibits discrimination based on race, color, or national origin.



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FREE SPEECH OR HARASSMENT?



OCR's response underscores 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.



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Freedom of expression

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.



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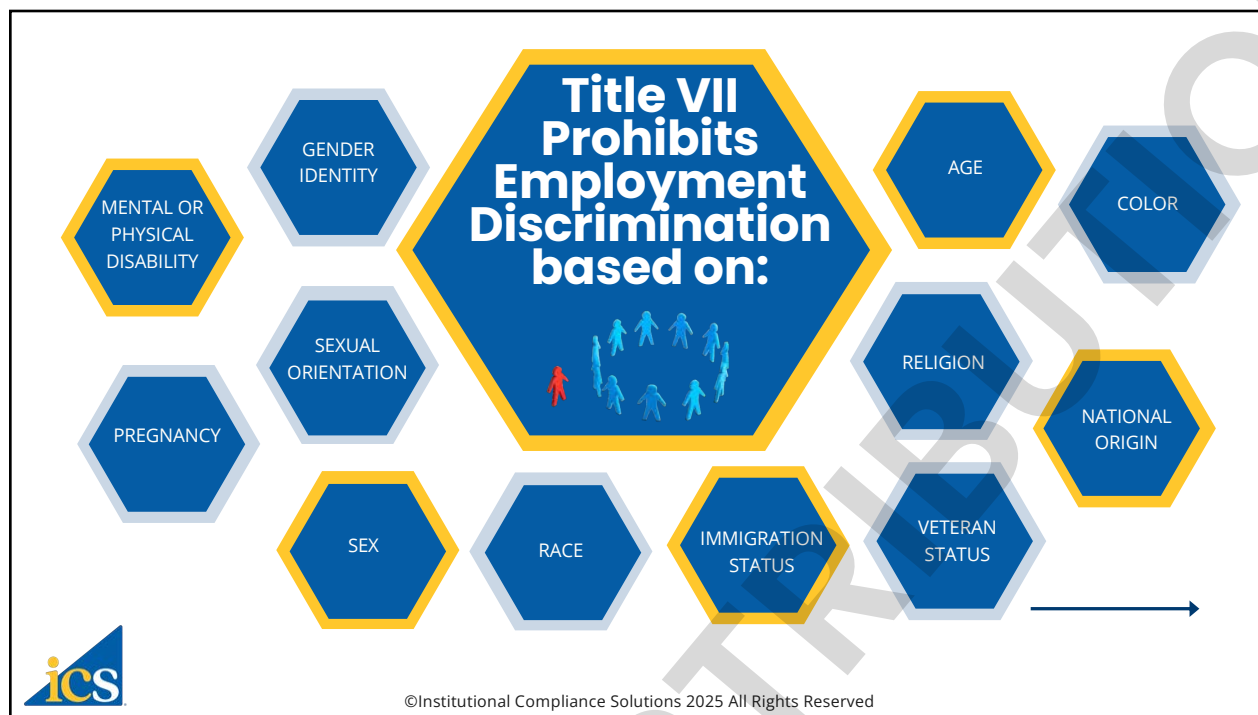
UNDERSTANDING TITLE VII

Enforced by the EEOC



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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.

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WHICH INDIVIDUALS ARE PROTECTED FROM DISCRIMINATION UNDER TITLE VII?



Applicants



Former
Employees



Employees



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TITLE VII CASES

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 minimis" standard.

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



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WHAT IS THE DIFFERENCE BETWEEN TITLE VI & TITLE VII?

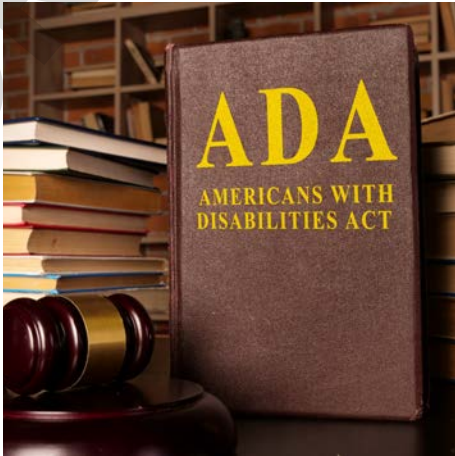
Discriminatory Conduct

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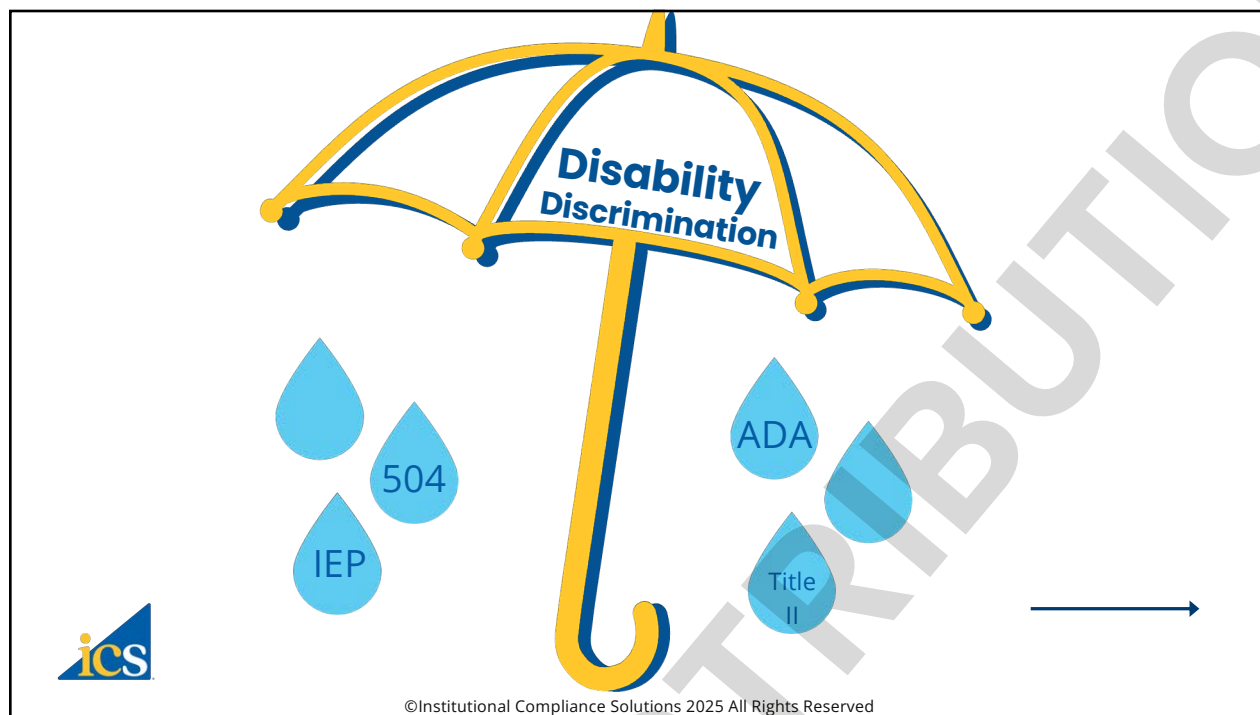
AMERICANS WITH DISABILITIES ACT
Enforced by the Department of Justice



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ADA

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.

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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

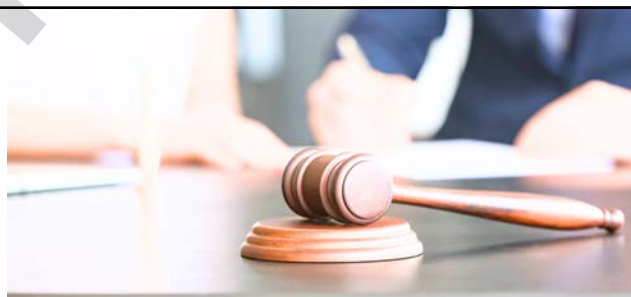
The ADA requires the provision of reasonable effective accommodations for eligible faculty, staff, students, and visitors across an institution's programs, activities, and services.



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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:



1 Walking

2 Talking

3 Thinking

4 Speaking

5 Breathing

6 Hearing



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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



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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!!



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ADA CASES

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.



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DON'T FORGET



State Law



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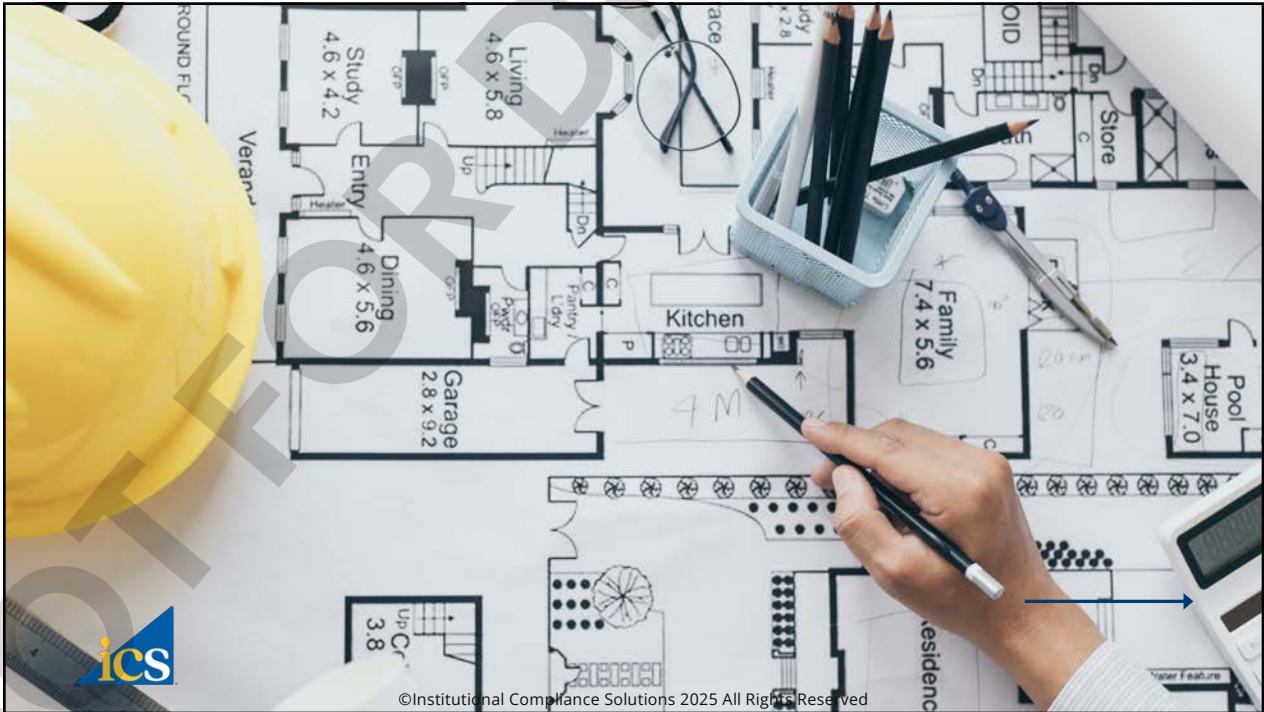
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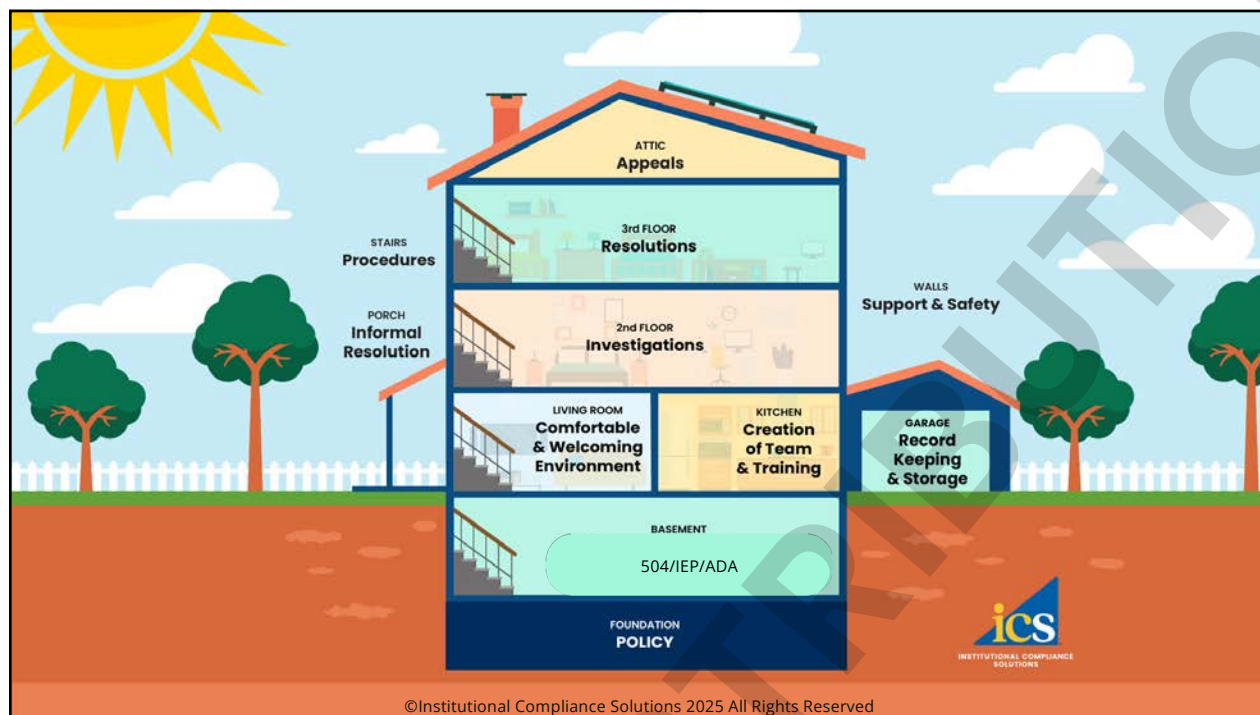
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FOUNDATION:

Policy



Clear



Concise



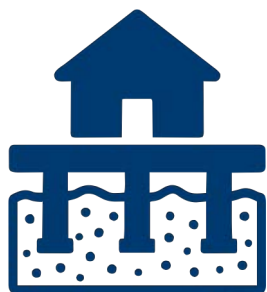
Consistent

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FOUNDATION:

Policy



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Scope



Definitions



Examples



Procedures

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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



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- **"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;




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CONSIDERATIONS



Where will the policy reside?

Who approves the policy?

Any union considerations?

Socialize the Policy?



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STAIRS:

Procedures



1

Written

2

Varying

3

Communication



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STAIRS:

Procedures



Where to report- written?



Advisors



Sanctions



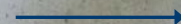
Complaint and Notice



Standard of Review



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WALLS:

Safety & Support



1

First

2

More than Physical

3

Evolving

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PROCESSES & PEOPLE

Walls with compliance and compassion



Individual

Collaborate

Unbiased

Educated on
Current Events

Follow Up

Transparent

Empathetic

Confidential



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BASEMENT:

504/IEP/ADA



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1

No Clear Policy

2

Accessibility

3

Unfamiliar

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BASEMENT:

504/IEP/ADA



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01

Which office is on first for a report?

02

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

03

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

04

Are we going to silo this type of report?

05

Employees (faculty /staff) versus students in resolution

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KITCHEN:

Team & Training



1

Humans

2

Resources/\$

3

Time

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KITCHEN:

Team & Training

- ✓ Title VI Coordinator
- ✓ Investigator
- ✓ Decision-Maker
- ✓ Informal Resolution Facilitator

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



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COMMUNITY TEAM



Students

- Students
- Clubs and Organizations



Faculty/Staff

- Teachers/Principals/District Employees
- Professors/Dept. Heads
- Student Life
- Facilities
- Athletics



Board of Education Board of Directors

- Interested and Connected Community Members



External

- Parents
- Police Department
- Advocacy Groups
- Attorneys



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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"



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LIVING ROOM

Welcoming Environment



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1

Space

2

Resources/\$

3

Topic/Tone

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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



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2ND FLOOR:

Investigations



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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



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3RD FLOOR:

Resolutions



1

Advisors

2

Authority

3

Data Driven

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3RD FLOOR:

Resolutions



01

Methods to stop discriminatory behavior

02

Educational component?

03

Enforcement- follow up to ensure compliance

04

Tracking mechanism

05

Student v. Employee - collaboration
with other departments

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ATTIC:

Appeals or Final Determination



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1

Policy Driven

2

Authority

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ATTIC:

Appeals or Final Determination



Grounds for Appeal



Appellate Officer



Timeframe for Appeal



Documentation for external next steps



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PORCH:

Informal Resolutions



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1

Participation

2

Expectations

3

Time/Effort

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PORCH:

Informal Resolutions

➤ Trained, Neutral Facilitators

➤ Length of Time in the IR process

➤ Flexibility in the IR Process

➤ Collaboration with Internal and External Sources

➤ Data Collection



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GARAGE:

Record Keeping



1

Volume

2

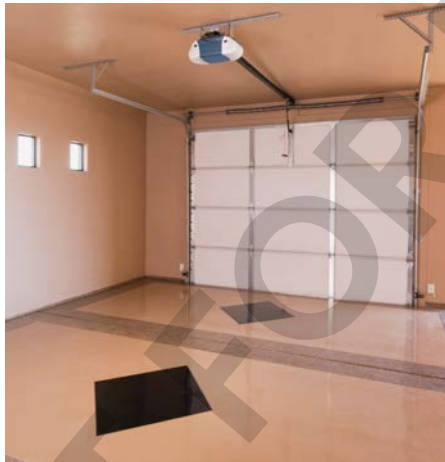
Systems

3

Turnover

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GARAGE:

Record Keeping

- Document retention policy review
- Sustainability
- Continuity between houses

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ULTIMATELY PATHWAY IS DICTATED BY POLICY, AND POLICY IS IMPACTED BY LAW

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WHO'S ON FIRST?

-  TITLE VI OFFICE?
-  HR?
-  TITLE IX OFFICE?
-  SAFETY?

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REPORT OF DISCRIMINATION

Name: Jane Lucero
Date of Discrimination or Harassment: Ongoing the months of July and August
Respondent: Gary Rogers
Summary of Incident: Mr. Rogers is my history teacher 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 do not want to be in his class again.



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NOTICE OF INVESTIGATION

Is your practice to send a NOI?



Who drafts it and sends it out?

Who receives it?



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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.



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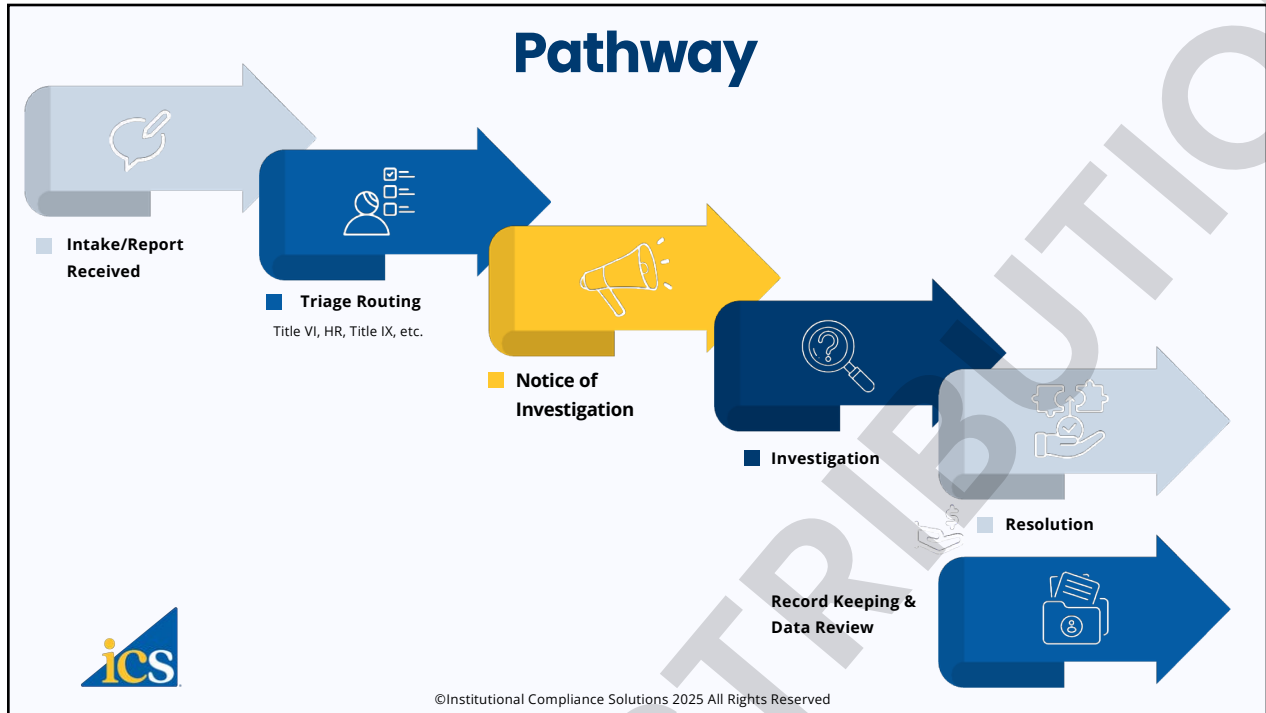
PUTTING IT INTO PRACTICE

- Map your intake process
- Draft an NOI template
- Train staff across department pathways
- Document



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LESSON SIX

ADDITIONAL CONSIDERATIONS



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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 high under certain managers



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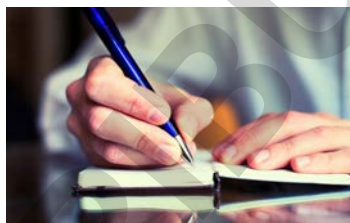
SUSTAINING COMPLIANCE

Communications:

- Updates from legal and outside entities
- Shared information internally
- Importance of reporting and transparency
- Build a culture of openness
- Regular evaluation of school climate and practices

Trainings:

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



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**EDUCATING
FACULTY/STAFF
ON REPORTING**



**EDUCATING
STUDENTS AND
FAMILIES ON THEIR
RIGHTS**

TRAINING & AWARENESS

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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



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PRACTICAL ACTION PLAN



Conduct a Title VI policy audit ("check-up")



Strengthen reporting systems and track implementation



Build a community of trust and transparency



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SEE YOU IN LESSON 7!



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LESSON SEVEN

WRAP UP AND ASSESSMENT OF KNOWLEDGE



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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! →



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HOW ICS CAN HELP

-  Community Partners receive Title VI on-demand courses and resources
-  Title VI Blueprint
-  ICS provides audit and consulting services as well as external role support



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CONGRATULATIONS!!



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