

CIVIL RIGHTS COMPLIANCE COORDINATOR

Background

Under Washington law, all school districts must designate at least one employee to be responsible for monitoring and coordinating the district's compliance with state nondiscrimination laws (chapters [28A.640](#) and [28A.642](#) RCW, and chapter [392-190](#) WAC), and to investigate complaints alleging discrimination on the basis of sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression or identity, disability, and the use of a trained dog guide or service animal by a person with a disability. This employee is often known as the Civil Rights Compliance Coordinator.

In addition, federal laws require each school district to also designate an employee to coordinate compliance with Title IX of the Education Amendments of 1972 (regarding sex discrimination), and Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act (ADA) (regarding disability discrimination). These employees are often known as the Title IX/Sex Equity Officer and Section 504/ADA Coordinator.

The district's Civil Rights Compliance Coordinator may also serve as the district's Title IX/Sex Equity Officer and/or Section 504/ADA Coordinator. However, if a district assigns different coordinators for these roles, they should regularly collaborate with one-another, particularly on issues related to sex and disability discrimination.

While school districts may determine additional job requirements, the Civil Rights Compliance Coordinator is, at a minimum, responsible for:

1. Coordinating and monitoring the district's compliance with state and federal laws, regulations, and guidelines that prohibit discrimination on the basis of sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression or identity, disability, and the use of a trained dog guide or service animal by a person with a disability;
2. Overseeing prevention efforts to avoid civil rights violations from occurring;
3. Implementing the district's discrimination complaint procedures; and
4. Investigating complaints alleging discrimination based on the protected classes listed above.

The district should document that it has communicated these responsibilities to the compliance coordinator. One way of accomplishing this is to have the compliance coordinator sign and date their job description.

Choosing a Compliance Coordinator

The Civil Rights Compliance Coordinator should be sufficiently knowledgeable about the requirements under civil rights laws, regulations, and guidance to advise the district about its policies, procedures, and practices and to investigate complaints alleging discrimination.

The school district should ensure that the coordinator receives appropriate and ongoing training. The district should clearly communicate the responsibilities and expectations of the position with the coordinator, and should provide the coordinator with the time and resources needed to effectively perform these duties.

Sample Civil Rights Compliance Coordinator Job Description

Note: If the Civil Rights Compliance Coordinator also serves as the district's Title IX/Sex Equity Officer and/or Section 504 Coordinator, please see the sample job descriptions for these roles for additional responsibilities.

Name: _____

Title: _____ **School District:** _____

Signature: _____ **Date:** _____

The Civil Rights Compliance Coordinator is responsible for monitoring the overall implementation of state and federal civil rights requirements for the school district, including chapters 28A.642 and 28A.640 RCW, and chapter 392-190 WAC. The major responsibility is to prevent discrimination and discriminatory harassment of students, employees, and others on the basis of sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression or identity, disability, and the use of a trained dog guide or service animal by a person with a disability. For issues regarding sex and disability discrimination, the compliance coordinator should coordinate with the district's Title IX/Sex Equity Officer and Section 504 Coordinator, respectively.

The Civil Rights Compliance Coordinator's duties include the following:

Knowledge of Civil Rights Requirements

- Develop a working knowledge of current civil rights laws, regulations, and guidelines related to public schools, including chapters 28A.640 and 28A.642 RCW, chapter 392-190 WAC, Title IX of the Education Amendments of 1972, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, as well as rules and guidelines adopted by OSPI and the U.S. Department of Education's Office for Civil Rights (OCR)
- Become familiar with resources and information available from OCR and OSPI's Equity and Civil Rights Office, and request technical assistance when needed
- Attend trainings for civil rights compliance coordinators and/or on civil rights issues generally, such as those offered by OSPI's Equity and Civil Rights Office, and share information with district administrators and staff

OSPI Reporting

- Serve as the district's liaison to OSPI's Equity and Civil Rights Office and OCR
- Ensure that the district submits all required reports to OSPI regarding civil rights compliance, including affirmative action plans and assurance reports
- Update compliance coordinator contact information with OSPI's Equity and Civil Rights Office, as needed

District Policies and Procedures

- Facilitate the implementation of the district's policies and procedures related to discrimination and discriminatory harassment, and ensure that they are applied consistently across the district and at each school building
- Coordinate revisions to district policies and procedures, as necessary, to ensure that they are up-to-date and consistent with current requirements under state and federal civil rights laws

Notices

- Regularly review district and building publications to ensure that they include a consistent nondiscrimination statement with all of the necessary protected classes and the name (or title), phone number, and address of the district's Section 504 Coordinator, Title IX/Sex Equity Officer, and Civil Rights Compliance Coordinator
- Use effective methods to annually inform all students, parents, and employees about the district's discrimination complaint procedure, such as in staff and student handbooks
- Have copies of the complaint procedure and any related forms available in each school building to provide to students, parents, staff, and others who allege discrimination or discriminatory harassment

Training and Consultation

- Provide ongoing support and training to administrators and district- and building-level staff about civil rights requirements, staff responsibilities, complaint procedures, and related district policies and procedures
- Disseminate information and coordinate training for students and/or parents about their rights under civil rights laws, including discriminatory harassment and the district's complaint procedures
- Advise the superintendent and school board regarding the status of the district's compliance with civil rights requirements
- Receive and respond to inquiries from students, parents, staff, administrators, and others regarding discrimination, discriminatory harassment, and other inquiries regarding civil rights
- Serve as a resource for administrators and district- and building-level staff about civil rights issues

Complaints and Investigation

- Respond to students, parents, staff, administrators, and others who report suspicion of civil rights violations, discrimination, or discriminatory harassment. The coordinator should investigate these concerns, institute corrective actions when appropriate, inform the individual about the district's complaint procedures, and assist individuals in filing complaints when needed
- Implement the district's discrimination complaint procedure, receive and process discrimination complaints, and oversee the step-by-step process to be sure that timelines are met. Coordinate with the district's Title IX/Sex Equity Officer and Section 504/ADA Coordinator when investigating and responding to complaints and concerns regarding discrimination on the basis of sex or disability
- Conduct and/or coordinate investigations of discrimination complaints in accordance with the district's discrimination complaint procedures. This may involve interviewing complainants, respondents, and witnesses; reviewing documents and other relevant materials; and researching legal standards and requirements relevant to the complaint. If the Compliance Coordinator has identified a conflict of interest with respect to a particular complaint, the Compliance Coordinator should recommend that the district hire a neutral outside investigator to investigate a particular complaint
- Upon completion of the investigation, provide the superintendent with a written report of the complaint and the results of the investigation in time for the superintendent to respond to the complainant within 30 days after the district initially received the complaint
- Organize and maintain records of all complaints filed regarding civil rights, discrimination, and discriminatory harassment, including all formal and informal complaints. At least annually, review complaint files to ensure that the district's complaint procedures and timelines are consistently being followed, and to identify any patterns and repeat offenders

Textbooks and Instructional Materials

- Participate in the development and implementation of the school district's instructional materials policy and bias review criteria with respect to bias pertaining to sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression or identity, disability, and the use of a trained dog guide or service animal in textbooks and instructional materials
- Ensure that the district evaluates all textbooks and instructional materials for bias, update bias review criteria when needed, and participate on the instructional materials committee when appropriate

Reviewing Systemic Barriers

- Participate in the development and implementation of the school district's process to routinely review disaggregated student discipline data and course and program enrollment data to identify and address potential disparities and systemic barriers based on sex, race, ELL status, and disability
- Continually monitor school programs, activities, and services (including, but not limited to, Advanced Placement courses, Highly Capable Programs, Career and Technical Education courses, Alternative Learning Experiences, extra-curricular activities, etc.) to ensure that all students are given an equal opportunity to participate without discrimination based on sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression or identity, disability, and the use of a trained dog guide or service animal
- Coordinate with the district's human resources office to evaluate employment criteria, recruitment, compensation, job classification, benefits, and advertising to ensure that they are not discriminatory