



# Idaho K-12 Title IX PLC #7

OCR Investigations





# What is OCR?

- Office for Civil Rights (U.S. Department of Education)
- Enforces federal civil rights laws including:
  - - Title VI (race, color, national origin)
  - - Title IX (sex discrimination)
  - - Section 504 (disability)
  - - ADA Title II





## How Complaints are filed

- Anyone can file a complaint
  - does not have to be the victim - witness, bystander, parent, or third party. Anyone can file a complaint on behalf of another person or group.
- Must generally be filed within 180 days
- Filed online, by mail, or email



# Initial Evaluation

- OCR determines:
  - Jurisdiction
  - Timeliness
  - Whether allegations state a potential violation
  - Whether to open investigation or dismiss





# Opening an Investigation


- OCR notifies the school
- Requests data and documents
  - Expect a short timeframe
  - Exhaustive production
  - Identify single contact
- Identifies issues under investigation...BUT



# Investigation Process

- OCR gathers evidence through:
  - Document review
  - Interviews (staff and complaining party)
  - Site visits (sometimes)
- Focus: whether school complied with civil rights laws in general - it is not limited to the initial complaint





# What do you have to produce?



- 1. Policies & Procedures:** current and prior versions (often 2–3 years back)
- 2. Information About the Specific Complaint:** everything that was done.
- 3. Communications:** parties, staff, everyone
- 4. Timeline / Chronology**
- 5. Training & Designation of Personnel**
- 6. Prior Similar Complaints / Pattern Evidence**
- 7. Student & Discipline Records (Redacted)**
- 8. Supportive Measures & Remedies**
- 9. Notice of Nondiscrimination**

## Possible Findings

- OCR may find:
  - No violation
  - Insufficient evidence
  - Violation of civil rights laws



# Resolution Options



- Early Complaint Resolution (ECR)
- Voluntary Resolution Agreement
- Formal findings and required remedies



# Early Complaint Resolution



- Voluntary agreement between parties
- Facilitated by OCR
- Ends investigation if resolved



## Voluntary Resolution Agreement

- School agrees to corrective actions
  - Audit
  - Continued oversight
  - Punch list
- No formal violation finding required
- OCR monitors compliance





## Remedies and Corrective Actions



- Policy revisions
- Training for staff
- Student-specific remedies
- Probation/ongoing oversight
- No “damages”
  - OCR → institutional compliance, policy changes, remedies for complainant
  - Court → damages, injunctive relief, attorney’s fees

# Monitoring and Compliance

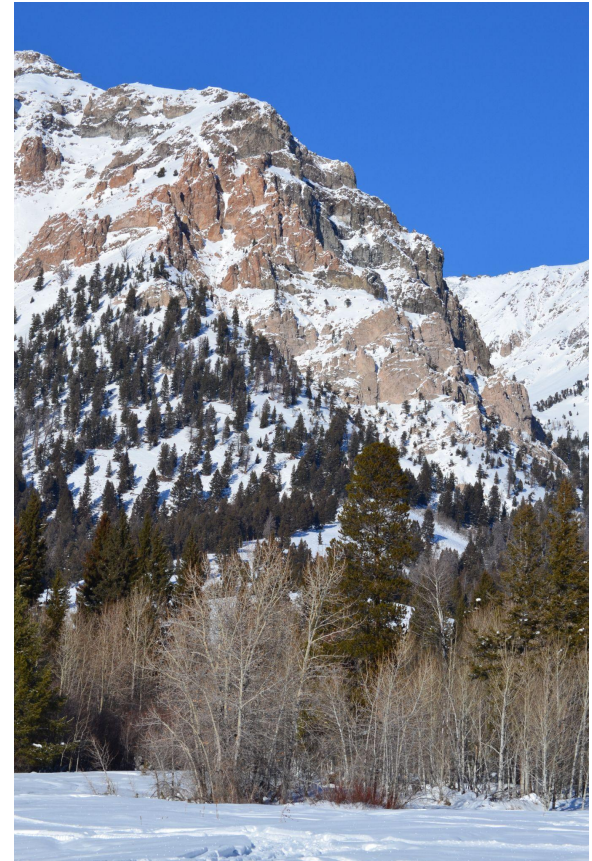


- OCR monitors implementation
- Requires reporting and documentation
- Can last months or years



## Failure to Comply

- OCR may initiate enforcement:
  - Administrative proceedings
  - Referral to Department of Justice
  - Potential loss of federal funding





## How to Succeed

- Maintain clear policies
- Train staff
- Respond promptly to complaints
- Title IX Coordinator
- Document everything



## Takeaways

- OCR investigations are serious but manageable
- Focus on compliance, documentation, and proactive response
- Engage the process



# Questions?



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# Next Training:

**? - May 12, 2026**

