**MEMORANDUM** Ref: 20-32-17

DATE: September 21, 2020

TO: College Presidents

FROM: Maryam Jacobs  
 System Internal Auditor and Methods, SBCTC

SUBJECT: CIVIL RIGHTS REVIEW PLAN, FYs 2020-22

In February 2020, Department of Education’s Office of Civil Rights (OCR) rescinded prior guidance for civil rights reviews and asked each state to submit a plan for performing civil rights reviews and ensuring recipients of federal fund are in compliance with all applicable laws. This change did not eliminate the requirement to perform reviews, but did allow states some flexibility on the scope and timing of reviews and allowed states to find ways to streamline processes by combining Perkins monitoring with civil rights reviews.

In creating the plan for post-secondary institutions, SBCTC elected to temporary stop civil rights review for two years and to train colleges in the following areas:

* Washington State’s plan for civil rights reviews in the future;
* The process for civil rights reviews; and
* Applicable federal civil rights guidelines and requirements, to include a brief overview of new Title IX requirements.

We hope providing this training will assist colleges in better serving students and will reduce the required administrative burden and time commitments required for full reviews. In addition to training, SBCTC hopes to use these trainings to gain a better understanding of how best to provide technical assistance to colleges in this area.

As the civil rights laws are applicable to a wide range of areas in student services and academics, we encourage deans, directors, and other key individuals working in these functions in trainings. Specific areas and roles include the following:

* Title IX Coordinators
* Disability and Section 504 Coordinators
* Disability/Access Service Directors
* Vice Presidents / Deans of Student Services
* Deans and Directors of career and technical programs
* Deans and Directors of Basic Education
* Individuals that may be tasked to investigate potential CR’s violations and complaints
* PIO and marketing staff
* Human Resource staff
* Director and staff of admission, registration, financial aid and counseling services
* Deans and Directors of residence halls

Please note training will not cover state civil right laws and does not include any guidelines on how to investigate and manage individual violations and investigations. The training will be designed to ensure colleges have required policies, procedures, and systems in place to ensure compliance with applicable laws and to familiarize key personnel in the process for future civil rights investigations.

SBCTC’s Systems Internal Auditor will contact the President’s office of each college in the next two years to make arrangements for training. If you have any questions or need any additional information, please contact Maryam Jacobs at (360) 704-4389 or [mjacobs@sbctc.edu](mailto:mjacobs@sbctc.edu).

We appreciate your assistance in carrying out this activity and look forward to working with you and your staff.

cc. Business Officers  
 Jan Yoshiwara, Executive Director, SBCTC

Carli Schiffner, Deputy Executive Director Education, SBCTC

John Boesenberg, Deputy Executive Director Business Operations, SBCTC

John Ginther, Director of Business Services, SBCTC

Steve Lewandowski, Chief Architect, SBCTC

Tim McClain, Program Administator, SBCTC

Vice Presidents and Directors of Human Resources, All Colleges

Vice Presidents and Directors of Student Services, All Colleges