



UNIVERSITY SYSTEM *of* MARYLAND

SENATE EDUCATION, ENERGY, AND THE ENVIRONMENT COMMITTEE

Senate Bill 435

Institutions of Higher Education and Elementary and Secondary Schools - Title VI Coordinators

March 5, 2025

Letter of Information

Chair Feldman, Vice Chair Kagan and members of the committee, thank you for the opportunity to offer testimony on Senate Bill 435. The bill requires institutions of higher education, including those comprising the University System of Maryland (USM), to designate a coordinator to ensure compliance with Title VI of the federal Civil Rights Act of 1964.

The USM comprises twelve distinguished institutions, and three regional higher education centers. We award eight out of every ten bachelor's degrees in the State. Each of the USM's 12 institutions has a distinct and unique approach to the mission of educating students and promoting the economic, intellectual, and cultural growth of its surrounding community. These institutions are located throughout the state, from Western Maryland to the Eastern Shore, with the flagship campus in the Washington suburbs. The USM includes three Historically Black Institutions, comprehensive and research universities, and the country's largest public online institution.

The Civil Rights Act of 1964 is considered "cornerstone" legislation that prohibits discrimination based on race, color, religion, sex, and national origin. Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

Across the USM, Title VI receives the attention and care the law requires and the community deserves. In a few cases, Title VI complaints are handled by the Title IX coordinator. At other institutions, those responsibilities fall to the assistant vice president for equity and civil rights; fair practices officers; assistant vice president for student success; and when involving employees, the chief human resources officer. Staff in these roles are often also responsible for providing strategic vision and leadership on compliance with all categories covered by an institution's discrimination and harassment policies & procedures.

As written, USM is concerned with the language ***"requiring the governing board of each institution of higher education in the State and local school systems to designate a Title VI Coordinator."*** This responsibility should be designated to each individual campus not the governing board which is our Board of Regents.

Our institutions have clear, standardized processes for handling Title VI complaints. Generally, these procedures are guided by non-discrimination policies and related procedures. Complaints can be filed with staff members (via phone or a central email address) as well as via online reporting forms and hotlines. Although anonymous complaints are harder to investigate, they can be made. When the complainant is known, staff conduct an intake meeting with the Complainant in order to obtain any and

all relevant information required for an assessment of the matter. The concerns would be assessed to determine, if true, if the alleged behavior constitutes discrimination. If so, the allegations would be investigated pursuant to appropriate policies and procedures and a determination would be made and resolutions would follow. Discrimination complaints against non-students are handled in a similar fashion but often by human resources offices. To ensure the community is aware of their right to file a complaint, the process is shared online by several offices (offices of the presidents, student affairs, human resources, equity/civil rights, etc.) across campuses, in campus policies and procedures, during orientation, and often annually to the entire campus community via email. Finally, there are no federal guidelines for training, but USM institutions do provide (and in some cases mandate) Title VI or non-discrimination training to different members of the campus community.

The very critical Title VI work is happening at our institutions. It is the System's hope that this bill is not requiring a new, discrete, specifically named Title VI coordinator, as that would be challenging due to the current budget crisis. Thank you for allowing the USM to share this information as the Committee considers Senate Bill 435.

