



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

230 SOUTH DEARBORN ST., 37<sup>TH</sup> FLOOR  
CHICAGO, IL 60604

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July 22, 2020

President Alan W. Cramb  
Illinois Institute of Technology  
Office of the President  
IIT Tower  
10 West 35th Street  
Suite 1900  
Chicago, Illinois 60616

*Via electronic mail only: XXXXXXXXXXXXXXXXXXXX*

Re: OCR Case No. 05-20-2021

Dear President Cramb:

This is to advise you of the resolution of the above-referenced complaint filed with the U.S. Department of Education (Department), Office for Civil Rights (OCR) against the Illinois Institute of Technology (Illinois Tech). The Complainant alleged that Illinois Tech discriminates against males, on the basis of sex, by offering *Illinois Tech Computer Discovery Camp for Girls* (Camp) and its companion program, *ITT Computer Discovery Club* (Club), only to females.

OCR is responsible for enforcing Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §§ 1681–1688, and its implementing regulation, 34 C.F.R. Part 106. Title IX prohibits discrimination on the basis of sex in any education program or activity operated by a recipient of Federal financial assistance from the Department. As a recipient of Federal financial assistance from the Department, Illinois Tech is subject to the requirements of Title IX.

As part of its investigation, OCR reviewed documentation provided by the Complainant and Illinois Tech. Prior to the completion of OCR's investigation, Illinois Tech expressed interest in resolving the complaint allegation and OCR determined it was appropriate to do so.

The regulation implementing Title IX, at 34 C.F.R. § 106.31(a), states that no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity operated by a recipient. The regulation implementing Title IX, at 34 C.F.R. § 106.34(a), states, in part, "a recipient shall not provide or otherwise carry out any of its education programs or activities separately on the basis of sex, or require or refuse participation therein by any of the students on the basis of sex."

Documentation provided to OCR indicates that Illinois Tech only accepted girls grades 7-9 to both the Camp and Club, although participants were able to continue through 12<sup>th</sup> grade. The Camp emphasized STEM (science, technology, engineering, and math), and the Club focused on "leadership." According to data provided by Illinois Tech, the Camp and Club together accepted

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

and offered programming to fewer than 100 girls annually. The website featured only female participants and the Camp flyer used the term “girls” when referring to participants. According to Illinois Tech, Camp and Club staff have received one or two inquiries about boys participating in the Camp and/or Club, and in those instances Illinois Tech has provided information about other programs that Illinois Tech offered.

Prior to OCR making a final determination, Illinois Tech expressed an interest in resolving the allegations and OCR determined that it was appropriate to resolve the allegations with an agreement pursuant to Section 302 of the *Case Processing Manual* (CPM). Based on its review of the website and a Camp flyer, OCR has concerns that Illinois Tech’s promotional materials do not convey that the program is open to students regardless of sex. For example, all the photographs on the website and a Camp flyer depict female campers. On July 8, 2020, Illinois Tech signed the enclosed Agreement, to resolve the issues raised in this complaint.

This concludes OCR’s investigation of the complaint. The complainant may have the right to file a private suit in court regardless of OCR’s determination. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR’s formal policy statements are approved by a duly authorized OCR official and made available to the public.

Please be advised that Illinois Tech may not harass, coerce, intimidate, or discriminate against any individual because he or she has filed a complaint or participated in the complaint resolution process. If this happens, the complainant may file another complaint alleging such treatment.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. In the event that OCR receives such a request, we will seek to protect, to the extent provided by law, personally identifiable information, which, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

I wish to thank you and your staff for the cooperation extended to OCR during the investigation of this complaint. In particular, OCR appreciates the assistance of XXXXXXXXXXXXXXXXXXXX in resolving this complaint. If you have any questions regarding this letter, please contact Mark Erickson at 312-730-1574 or via email at mark.erickson@ed.gov.

Sincerely,

Aleeza Strubel  
Supervisory Attorney

Enclosure

cc: XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX