



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

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REGION VII
ARKANSAS
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October 2, 2020

Sent via e-mail only to XXXXX

XXXXX XXXXX, XXXXX,
XXXXX XXXXX XXXXX
XXXXX XXXXX XXXXX
XXXXX, XXXXX XXXXX

Re: University of Central Oklahoma
OCR Case Number: 07202179

Dear XXXXX XXXXX:

On March 9, 2020, the U.S. Department of Education (Department), Office for Civil Rights (OCR), received a complaint against the University of Central Oklahoma (University) in Edmond, Oklahoma alleging discrimination on the basis of sex. The complaint alleged that the University discriminates against boys on the basis of sex. Specifically, the complaint alleged that: “the University sponsors, promotes, advertises, organizes, operates, and hosts” the Computer Forensics Summer Academy & STEM CareerBuilder for Girls (Program), which is a “girl-only, no boys-allowed” educational program that discriminates against male students on the basis of sex. This letter is to confirm the University has voluntarily submitted a Resolution Agreement (Agreement) to OCR to resolve the complaint.

Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §§ 1681 et seq., and its implementing regulation at 34 C.F.R. Part 106, prohibit discrimination on the basis of sex in any education program or activity receiving Federal financial assistance (FFA). Under Title IX, OCR has enforcement jurisdiction over recipients of FFA from the Department. As a recipient of FFA from the Department, the University is subject to Title IX and to OCR’s jurisdiction. Additional information about the laws OCR enforces is available on our website at <http://www.ed.gov/ocr>.

OCR investigated whether the University discriminates against male students, on the basis of sex, in administering the Program, in violation of Title IX.

During its investigation, OCR reviewed documentation the University submitted, including information regarding student participation in the Program and funding for the Program, and information regarding similar programs the University offers for both boys and girls. In addition, OCR reviewed the Program’s website.

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

An analysis of the evidence obtained to date is set forth below. To protect individuals' privacy, the names of employees, witnesses, and other parties were not used in the letter.

Legal Standard

The Title IX regulation, 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 education program or activity operated by a recipient.

Findings of Fact to Date

According to the evidence obtained by OCR, the Program is a National Science Foundation (NSF) grant-funded research project which aims to study how to encourage, engage, and prepare high school girls to pursue science, technology, engineering, and mathematics (STEM) education and careers. The Program is funded by NSF for three years (2018-2021). The University does not provide any funding for the Program.

The University acts as the sponsor under the grant and makes available unused classroom space and equipment to the Program, as well as housing and dining services to Program participants, at rates comparable to those charged to participants of other nonaffiliated conferences and programs which lease and/or use facilities and campus space for summer programs. University personnel provide administrative support for the NSF grant.

The University does not make any decisions regarding the admission, design of, or research protocols for the Program. The admission decisions are made using a personal computer randomize function.

The purpose of the Program is to study under-representation of women in STEM fields by providing high school girls with job-exploration opportunities and skill-development venues and evaluate further participation in STEM fields by project participants.

The University informed OCR that the eligibility requirements for the Program are:

Any high school female students are eligible to apply online for the annual Computer Forensics (CF) Summer Academy. Additional documentation to complete the application for any paid internships and research fellowships are outlined below, as well as stated in the submitted proposal. The same computer-randomized algorithm is used for selecting interns and fellows.

- *Completed the CF Summer Academy in prior year(s)*
- *Submit a teacher recommendation letter for character references*
- *Submit a transcript to show if any STEM courses were taken in high school*

In the 2018-19 school year, 89 female students applied for the Program and 29 male students applied. 18 female students and 8 male students participated in the Program.

In the 2019-20 school year, 331 female students applied for the Program, and 1 male student started his application but did not finish. 50 female students participated in the Program. The University has informed OCR that it is unclear why boys were allowed to participate in the Program for the 2018-19 school year and then not allowed to participate in the Program for the 2019-20 school year.¹

The University does not host any programs offered only to boys. The University did offer a coeducational camp for crime scene investigation over a six-year period (2013- 2018).

Resolution

Prior to the completion of OCR's investigation into this complaint, the University requested to enter into a voluntary resolution agreement with OCR pursuant to Section 302 of OCR's *Case Processing Manual*. The University stated it had discussed with the NSF how it could make changes to the Program without impacting the grant, including changing the name of the Program by removing the word "girls" and making sex-neutral admissions criteria. OCR determined that such a resolution would be appropriate based on concerns identified during the investigation. The University signed a resolution agreement (Agreement) (copy enclosed) on October 1, 2020, which, when fully implemented, will resolve OCR's concerns. For more information, please consult the Agreement.

OCR considers this complaint resolved effective the date of this letter and will monitor the University's implementation of the Agreement. When OCR concludes the University has fully implemented the terms of the Agreement, OCR will close the complaint. If the University fails to carry out the Agreement, OCR may resume its investigation.

Recipients of Federal funds are prohibited from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Federal civil rights law. Complaints alleging such retaliation may be filed with OCR. 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, it will seek to protect, to the extent provided by law, personally identifiable information that could reasonably be expected to constitute an unwarranted invasion of personal privacy if released.

This letter sets forth OCR's determination in an individual OCR case. 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. Complainants may have the right to file a private suit in Federal court whether or not OCR finds a violation.

¹ Information about the Program can be found at <https://computeracademyforgirls.com/>

If you have questions concerning this letter, please contact, XXXXX XXXXX, Attorney, at (816) 268-XXXX (voice) or (877) 521-2172 (telecommunications device for the deaf), or by e-mail at XXXXX.XXXXX@ed.gov.

Sincerely,

Megan Levetzow
Supervisory Attorney

Enclosure