10 COMPLIANCE PITFALLS
for Charter Schools

1 Thinking Charter Schools are Exempt

Myth: "We don't have to follow Title IX."

Reality: Any school receiving federal funding is covered, including through federal meal programs, grants, or other pass-through funds from the state.

2 Failing to Name a Qualified Title IX Coordinator

Not formally appointing someone, or assigning the role to a staff member without proper training.

Coordinator name & contact info must be posted on the school's website and in handbooks.

3 Missing or Outdated Policies

Policies not compliant with the 2020 Title IX regulations.

Lack of a clear grievance process for both students and employees.

4 Ignoring "Non-Title IX" Sex Discrimination

Title IX applies beyond sexual harassment, including pregnancy discrimination, unequal athletics, and gender stereotyping.

Failure to address these issues can still trigger OCR complaints.

5 No Clear Reporting Process

Staff and students unclear on how to report concerns.

Reports only going to principals or HR without proper Title IX follow-up.

6 Mishandling Small-School Conflicts of Interest

In small schools, the same person often wears multiple hats.

Using the same person as investigator and decision-maker is a compliance violation.

7 Inadequate Training

Only training the Title IX Coordinator, leaving teachers, coaches, and other staff unaware of their reporting obligations.

Federal law requires training for Title IX staff and establishes reporting obligations for all employees.

8 Poor Documentation

No written record of supportive measures, investigation steps, or resolutions.

"If it's not documented, it didn't happen" in OCR's eyes.

9 Overlooking Athletics

Not tracking participation numbers, facilities, equipment, and scheduling to ensure equity.

Failing the "Three-Part Test" for gender equity can result in significant findings.

10 Inconsistent Policy Application

Handling similar complaints differently for students vs. staff or based on who is involved.

Inconsistency undermines credibility and can be cited as evidence of discrimination.

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