



Testimony  
Before the Subcommittee on Workforce  
Protections, Committee on Education  
and the Workforce, House of  
Representatives

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For Release on Delivery  
Expected at 10:00 a.m. ET  
Wednesday, June 26, 2024

## HIGHER EDUCATION

# Opportunities Exist to Improve Federal Oversight of Alleged Employment Discrimination at Colleges and Universities

Statement of Melissa Emrey-Arras, Director,  
Education, Workforce, and Income Security

# GAO Highlights

Highlights of [GAO-24-107661](#), a testimony before the Subcommittee on Workforce Protections, Committee on Education and the Workforce, House of Representatives

## Why GAO Did This Study

Colleges and universities employ thousands of faculty and staff across the country. These institutions are subject to federal laws prohibiting employment discrimination. However, some faculty and other employees have reported experiencing discrimination.

This testimony is based on relevant aspects of GAO's March 2024 report, entitled *Higher Education: Employment Discrimination Case Referrals between Education and the Equal Employment Opportunity Commission Could Be Improved* ([GAO-24-105516](#)). This testimony addresses the roles of Education's OCR and EEOC and how they process complaints of employment discrimination at higher education institutions.

GAO analyzed Education complaint data from fiscal years 2011–2022, and EEOC complaint data from fiscal years 2011–2021 (each data set was the most recent available). GAO also reviewed relevant federal laws, regulations, and policies, and interviewed agency officials.

## What GAO Recommends

GAO made two recommendations in its March 2024 report. GAO recommended that Education track the timing of employment discrimination complaint referrals to EEOC. Education agreed. GAO also recommended that EEOC develop a protocol to ensure it receives and processes all complaint referrals from Education. EEOC neither agreed nor disagreed, but acknowledged the importance of processing all referrals and is taking action to address this recommendation.

View [GAO-24-107661](#). For more information, contact Melissa Emrey-Arras at (617) 788-0534 or [emreyarrasm@gao.gov](mailto:emreyarrasm@gao.gov).

June 26, 2024

## HIGHER EDUCATION

### Opportunities Exist to Improve Federal Oversight of Alleged Employment Discrimination at Colleges and Universities

## What GAO Found

From fiscal years 2011 through 2021, about 20,000 complaints alleging employment discrimination at an institution of higher education were filed by faculty or other employees, according to GAO's analysis of complaint data from the Department of Education's Office for Civil Rights (OCR) and the Equal Employment Opportunity Commission (EEOC). Allegations of discrimination included complaints based on race, sex, disability, national origin, color, and religion. OCR received 1,944 complaints from fiscal years 2011 through 2022. OCR investigates complaints that meet its criteria, but refers the majority of its employment-related complaints to EEOC for investigation consideration. EEOC investigated 18,559 complaints of employment discrimination against higher education institutions from faculty or other employees from fiscal years 2011 through 2021.

Education and EEOC have processes in place to respond to employment discrimination complaints and coordinate referrals, but GAO found that the referral process was often delayed and sometimes resulted in missing records. In fiscal year 2022, Education processed and referred to EEOC 99 complaints alleging employment discrimination at colleges and universities. GAO found that Education referred the complaints in 71 days on average, although Education policy calls for doing so within 30 days. However, Education does not track the timing of these referrals. Without doing so, Education is missing opportunities to identify and learn from its field offices that are processing timely referrals. Lessons learned could be applied agency-wide to reduce delays. This is important because individuals with delayed complaints may experience adverse effects, such as continued discrimination or less pay.

In fiscal year 2021, EEOC processed 1,342 complaints alleging employment discrimination at colleges or universities based on race, color, religion, sex, national origin, or disability, some of which were referred by Education. However, EEOC does not have a protocol to consistently track and account for the complaint referrals, which can sometimes result in missing referrals. EEOC acknowledged that it could not locate all OCR referrals. For example, one recent referral from OCR was not initially recorded by EEOC until the individual who filed the complaint followed up. Without a protocol to ensure that EEOC receives and processes all Education complaint referrals, some may be missed or resolution may be delayed.

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Chairman Kiley, Ranking Member Adams, and Members of the Subcommittee:

Thank you for the opportunity to be here today to discuss our work on employment discrimination at institutions of higher education. Our findings focus on the government's process for handling employment discrimination complaints, including those related to religious discrimination. My testimony today is based on relevant aspects of our March 2024 report entitled *Higher Education: Employment Discrimination Case Referrals between Education and the Equal Employment Opportunity Commission Could Be Improved*.<sup>1</sup>

My statement today will address the roles of Education's Office for Civil Rights (OCR) and the Equal Employment Opportunity Commission (EEOC) and how they process complaints of employment discrimination at higher education institutions. I will also highlight two recommendations from our report that would help ensure timely and complete processing of all employment discrimination complaints.

To examine these issues, we analyzed data from Education's OCR and EEOC. We analyzed OCR complaint data from fiscal years 2011 through 2022 and EEOC complaint data from fiscal years 2011 through 2021. Each data set was the most recent available at the time of our review. We have concerns with the data fields that EEOC uses to record complaint referrals from other federal agencies, and we discussed these concerns in the report. We concluded that the remaining EEOC data fields and all of the OCR data we analyzed were sufficiently reliable for our purposes of reporting counts of employment discrimination complaints in various categories, such as the complaint's relevant federal statute and resolution.

We also reviewed federal laws and regulations, OCR and EEOC policy documents, and other relevant documents. In addition, we interviewed OCR and EEOC officials. We compared the practices of OCR and EEOC to agency policy, federal standards for internal control, and leading practices for agency collaboration.

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<sup>1</sup> GAO, *Higher Education: Employment Discrimination Case Referrals between Education and the Equal Employment Opportunity Commission Could Be Improved*, [GAO-24-105516](#) (Washington D.C.: March 2024).

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This work was conducted in accordance with generally accepted government auditing standards. More details on our scope and methodology can be found in the full report.

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## Background

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### Federal Statutes Related to Employment Discrimination

Several federal statutes protect employees, including the faculty and other employees of colleges and universities, from employment discrimination. Under federal law, discrimination in an employment setting on the basis of race, color, religion, sex, national origin, disability, age (40 and older), and genetic information is generally prohibited. The federal statutes discussed in our report include:<sup>2</sup>

- Title VII of the Civil Rights Act of 1964, which prohibits employment discrimination based on race, color, religion, sex, or national origin.
- Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in programs or activities that receive federal financial assistance.
- Title IX of the Education Amendments of 1972, which prohibits discrimination based on sex in education programs or activities that receive federal financial assistance.
- The Americans with Disabilities Act of 1990 (ADA), which prohibits discrimination on the basis of disability.<sup>3</sup>
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in programs or activities that receive federal financial assistance.

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<sup>2</sup> To simplify our discussion of employment discrimination complaints, our review excluded additional federal statutes related to employment discrimination, including the Equal Pay Act of 1963, the Age Discrimination in Employment Act of 1967, the Genetic Information Nondiscrimination Act of 2008, and the Pregnant Workers Fairness Act. We also did not review state nondiscrimination laws or equal employment procedures at higher education institutions that may be used to address employment discrimination complaints internally.

<sup>3</sup> Title I of the ADA specifically applies to employment and Title II of the ADA applies to public services.

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## EEOC and Education's OCR Both Have Roles in Addressing Discrimination at Institutions of Higher Education

Both EEOC and Education's OCR receive individual complaints of employment discrimination in higher education.

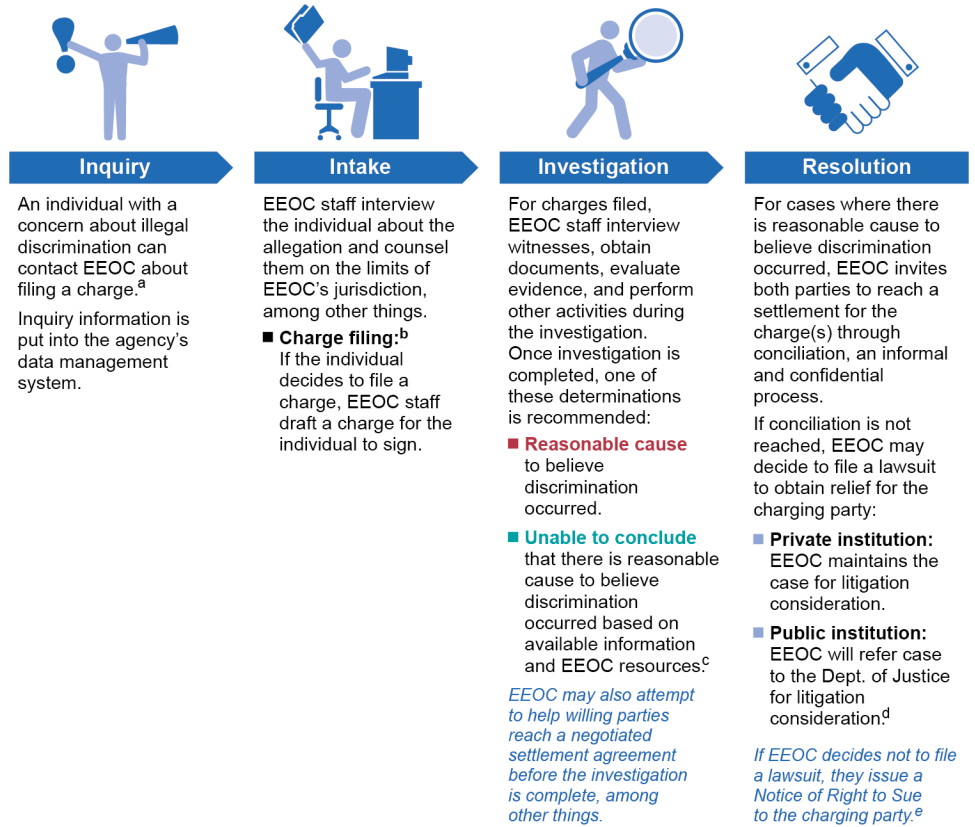
EEOC promotes equal opportunity in the workplace and is the primary federal agency responsible for enforcing employment discrimination statutes.<sup>4</sup> EEOC has 53 field offices throughout the country that handle discrimination complaints received by the agency. Once received, the complaints are captured in EEOC's data system and assigned to investigative staff.

EEOC investigative staff take steps to address employment discrimination complaints, which the agency refers to as charges (see fig. 1). EEOC files litigation in select cases against employers where it has determined there is reasonable cause to believe an employer engaged in employment discrimination. EEOC also reaches out to employers and the public to educate and prevent discrimination, among other things.

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<sup>4</sup> EEOC has jurisdiction over most employers with at least 15 employees. 42 U.S.C. §§ 2000e(b), 2000e-4.

**Figure 1: General Overview of EEOC's Process for Addressing Employment Discrimination Complaints**



Source: GAO analysis of Equal Employment Opportunity Commission (EEOC) procedures; GAO (icons). | GAO-24-107661

Note: This figure provides a general overview of the charge investigation process and does not include every possible path to file a charge or path a charge can take during a charge investigation. For example, in most instances, EEOC offers mediation to the parties to attempt to resolve a charge before a full investigation begins.

<sup>a</sup>In some circumstances, an individual, agency, or organization may file a charge on behalf of another person. In addition, an EEOC Commissioner can file a charge for investigation. See 29 C.F.R. § 1601.11.

<sup>b</sup>Most laws enforced by EEOC require individuals to file a charge with EEOC before they can file an employment discrimination lawsuit against their employer.

<sup>c</sup>If EEOC is unable to conclude that there is reasonable cause to believe that discrimination occurred, or decides not to proceed further with its investigation, it will issue a Notice of Right to Sue to the charging party, which allows them to file a lawsuit against their employer. In making this determination, EEOC makes no decision regarding the merits of the allegations included in a charge.

<sup>d</sup>For some laws that EEOC enforces other than Title VII of the Civil Rights Act of 1964 or Title I of the Americans with Disabilities Act of 1990, EEOC, itself, has authority to litigate against public entities.

<sup>e</sup>In most cases, an individual alleging illegal discrimination may file a case in court only after the conclusion of EEOC's process.

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OCR's mission is to ensure equal access to education and to promote educational excellence throughout the nation through vigorous enforcement of civil rights. OCR routes the discrimination complaints it receives to one of its 12 regional offices and assigns complaints to investigative staff members, according to officials.<sup>5</sup> OCR investigative staff capture information about the complaints in OCR's data system and take steps to address the complaints.

A complaint can be filed with OCR by someone who experienced, witnessed, or heard about alleged civil rights violations in a school. An OCR investigator evaluates the information in the complaint against certain criteria to determine whether it constitutes a complaint subject to further processing. These criteria include whether the complaint: (1) falls within OCR's subject matter jurisdiction to investigate, (2) was filed in a timely manner, and (3) includes sufficient detail for OCR to infer that discrimination or retaliation may have occurred.

If the complaint meets the criteria, OCR will conduct an investigation. Alternatively, if the complaint does not meet the criteria, OCR dismisses the complaint, which could include a referral to EEOC, if appropriate.

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<sup>5</sup> Education's OCR may also open its own investigation as a compliance review to assess institutions' adherence to requirements.

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## Federal Agencies Have Handled about 20,000 Employment Discrimination Complaints in Higher Education since 2011, but Had Issues with Referral Timeliness and Tracking

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### Thousands of Employment Discrimination Complaints in Higher Education Were Filed with Education and EEOC, Although the Vast Majority Were Handled by EEOC

#### Education's OCR

From fiscal years 2011 through 2021, about 20,000 complaints alleging employment discrimination at an institution of higher education were filed by faculty or other employees, according to our analysis of complaint data from Education's OCR and EEOC. Our analysis included all employees at higher education institutions—both faculty and other employees—who filed an employment discrimination complaint.

According to our analysis of OCR's discrimination complaint data, the agency received 1,944 total complaints by faculty or other employees that alleged employment discrimination at higher education institutions from fiscal years 2011 through 2022. Complaints alleging employment discrimination against higher education institutions accounted for about 1.4 percent of all complaints OCR opened in this time frame.<sup>6</sup>

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<sup>6</sup> "All complaints" refers to complaints filed against any type of entity (not just higher education institutions) under all statutes that OCR enforces.



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OCR refers a majority of the employment discrimination complaints it receives to EEOC for investigation consideration.<sup>7</sup> From fiscal years 2011 through 2022, OCR referred 1,073 complaints alleging employment discrimination at institutions of higher education to EEOC for investigation consideration.<sup>8</sup> In addition to referring complaints to EEOC, OCR may dismiss a complaint if it concurrently is filed in a state or federal court, or if it has been filed too late, among other reasons.

## EEOC

Our analysis of EEOC data found that the agency investigated 18,559 charges of employment discrimination against higher education institutions from faculty or other employees from fiscal years 2011 through 2021.<sup>9</sup> These charges alleged employment discrimination under certain statutes based on race, color, religion, sex, national origin, or

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<sup>7</sup> Regulations issued by EEOC and the Department of Justice provide the steps required for interagency coordination of complaint processing for complaints of employment discrimination filed against recipients of federal financial assistance on the basis of race, color, religion, sex, or national origin. These steps include OCR determining if it has jurisdiction over an employment discrimination complaint and if the complaint should be referred or transferred to EEOC. In general in this statement and our March 2024 report, we refer to complaints originally filed with OCR but processed by EEOC as “referrals,” though depending on jurisdictional determinations, the movement of the complaint from OCR to EEOC could be either a “transfer” or a “referral” to EEOC under the regulations. OCR may also refer complaints of employment discrimination filed against recipients of federal financial assistance on the basis of disability to EEOC if EEOC has jurisdiction for them. Otherwise, OCR refers such disability employment complaints to Justice’s Civil Rights Division if OCR does not have jurisdiction.

<sup>8</sup> For our analysis of referrals from OCR to EEOC, we used OCR’s field for the date on which OCR closed the complaint. Because we limited the records we analyzed overall to those that OCR opened during fiscal years 2011 through 2022, our analysis may have excluded some complaints that were opened before fiscal year 2011 but closed during fiscal years 2011 through 2022. OCR maintains data on six types of complaint resolutions: (1) Dismissal, (2) Administrative Closure, (3) Early Complaint Resolution, (4) No Violation or Insufficient Evidence, (5) Closure with Change, and (6) Enforcement. In total, OCR resolved 72 percent of employment discrimination complaints closed from fiscal years 2011 through 2022 against a higher education institution via dismissal. Referring a complaint to another federal agency, such as EEOC, is considered a complaint dismissal. OCR resolved 28 percent of employment discrimination complaints it closed with allegations against higher education institutions in fiscal years 2011 through 2022 through methods other than dismissal. For example, these methods could include Closure with Change (reaching a resolution agreement when a violation is found).

<sup>9</sup> These charges were based on Title VII of the Civil Rights Act or Title I of the ADA. In fiscal year 2021, EEOC processed 1,342 such charges.

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disability, and account for 2 percent of all charges filed with EEOC during this time frame.<sup>10</sup>

Allegations of discrimination based on race, sex, and disability constituted a large majority of the charges EEOC received against higher education institutions, with allegations based on national origin, color, and religion being less common. In total, EEOC investigated an average of 1,366 charges per fiscal year alleging employment discrimination against higher education institutions based on race, color, national origin, sex, or religion.<sup>11</sup> EEOC investigated an average of 535 charges per fiscal year alleging disability-based employment discrimination against higher education institutions (see fig. 2).<sup>12</sup>

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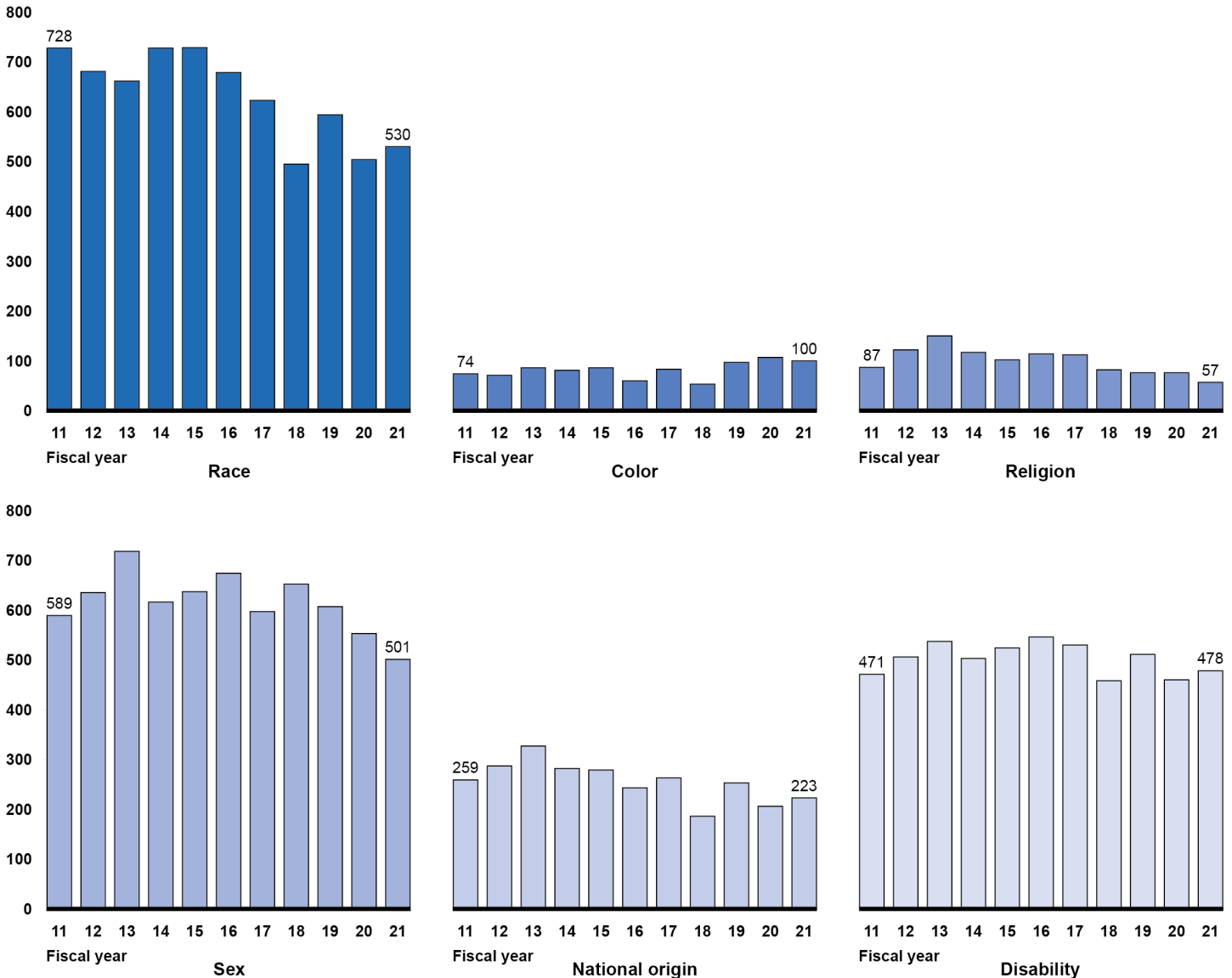
<sup>10</sup> These charges were filed directly by individuals, were complaints referred from Education's OCR, or were from other sources, such as attorney-drafted charges, an EEOC Commissioner, or other federal agencies that refer complaints to EEOC. "All charges" refers to charges filed against any type of employer (not just higher education institutions) under all statutes that EEOC enforces.

<sup>11</sup> These represent unique charges under Title VII of the Civil Rights Act, each of which may include multiple bases (e.g., race, sex). See 42 U.S.C. § 2000e-2.

<sup>12</sup> These represent unique charges under Title I of the ADA.

**Figure 2: Number of EEOC Discrimination Charges Alleged against Higher Education Institutions Under Certain Statutes, by Basis of Discrimination, Fiscal Years 2011–2021**

Number of EEOC charges alleged against a higher education institution



Source: GAO analysis of Equal Employment Opportunity Commission (EEOC) data. | GAO-24-107661

Note: GAO’s analysis included charges filed under Title VII of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, religion, sex, or national origin, and Title I of the Americans with Disabilities Act of 1990 (ADA), which prohibits employment discrimination on the basis of disability. Retaliation for asserting protected rights under Title VII of the Civil Rights Act and Title I of the ADA is also prohibited by those laws, but is not included in this figure for data clarity. GAO’s analysis did not include charges filed under other laws that EEOC enforces. GAO’s analysis

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included all employees at higher education institutions—both faculty and other employees—who filed an employment discrimination charge with EEOC. GAO was not able to identify only charges from higher education faculty because EEOC charge data do not indicate the title or position of the individual complainant. This figure does not include EEOC’s “Other” basis because there were few charges under this basis. A charge may be filed on more than one basis, thus the number of charges within a fiscal year across bases should not be summed.

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### A Majority of Education’s Employment Discrimination Complaint Referrals Were Late

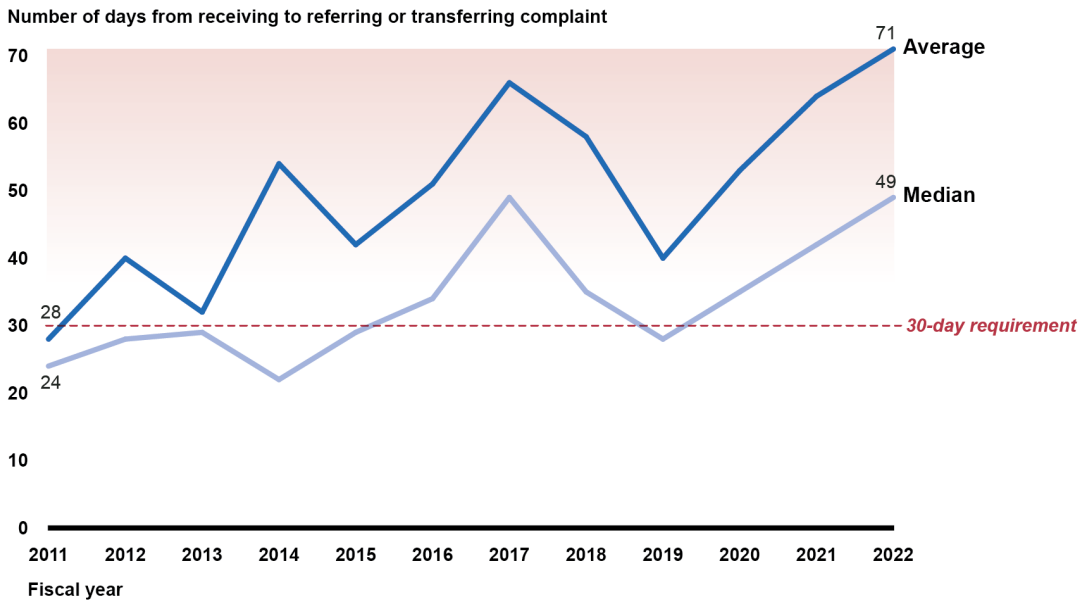
OCR made untimely referrals of employment discrimination complaints to EEOC from fiscal years 2011 through 2022. OCR’s Case Processing Manual states that within 30 calendar days of receiving certain employment discrimination complaints, OCR will determine whether EEOC may have jurisdiction and if so, refer the complaint to EEOC, as appropriate.<sup>13</sup> However, we found that in fiscal year 2022 OCR referred 72 of 99 such complaints after the 30-day deadline.<sup>14</sup> The percentage of OCR’s complaints referred to EEOC after 30 days has increased from 40 percent in fiscal year 2011 (17 of 42) to 73 percent in fiscal year 2022 (72 of 99), according to our analysis. In fiscal year 2022, we found that OCR took an average of 71 days to refer complaints to EEOC (see fig. 3).

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<sup>13</sup> The 30-day requirement has been in OCR’s Case Processing Manual since at least May 2008.

<sup>14</sup> For our analysis of referrals from OCR to EEOC in this section and our March 2024 report, we used OCR’s field for the date on which OCR closed the complaint. Because we limited the records we analyzed overall to those that OCR opened during fiscal years 2011 through 2022, our analysis may have excluded some complaints that were opened before fiscal year 2011 but closed during fiscal years 2011 through 2022.

**Figure 3: Average Number of Days for Education’s OCR to Refer Certain Higher Education Employment Discrimination Complaints to EEOC, Fiscal Years 2011–2022**



Source: GAO analysis of Department of Education’s Office for Civil Rights (OCR) data on Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972. | GAO-24-107661

Note: The data in this figure only include employment discrimination complaints OCR categorized under Title VI of the Civil Rights Act or Title IX, which have an OCR policy requirement to be referred or transferred to the Equal Employment Opportunity Commission (EEOC), if applicable, within 30 days. Complaints of employment discrimination that OCR categorizes under Title II of the Americans with Disabilities Act of 1990 or Section 504 of the Rehabilitation Act of 1973, and refers or transfers to EEOC, do not have a comparable referral or transfer deadline. For GAO’s analysis of referrals and transfers from OCR to EEOC, GAO used OCR’s field for the date on which OCR closed the complaint. Because GAO limited the records analyzed overall to those that OCR opened during fiscal years 2011 through 2022, GAO’s analysis may have excluded some complaints that were opened before fiscal year 2011 but closed during fiscal years 2011 through 2022.

In creating the 30-day requirement, one consideration was protecting the rights of complainants. OCR and EEOC officials acknowledged that referral delays could delay complaint investigations and negatively affect individuals filing an employment discrimination complaint. For example, these delays could make the complaints more challenging for EEOC to investigate. In addition, an individual who waits longer for a complaint to be resolved and remains employed at the institution could have additional exposure to discriminatory behavior, which research suggests could affect both their mental and physical health. While waiting for complaints to be addressed, individuals who filed complaints related to hiring or promotion could also have less income and employers may incur ongoing staff costs and legal fees.

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OCR officials said they aim to meet the requirement and process complaints in a timely manner, but that evaluating employment discrimination complaints within 30 days, including gathering sufficient details to determine jurisdiction, presents a significant challenge. Yet, even in the current environment, we found that 27 percent (27 of 99) of complaints in fiscal year 2022 were referred to EEOC within the required 30 days. Assessing and learning from these instances of timely complaint processing could inform efforts to reduce delays for other complaints.

However, OCR does not track the extent to which its regional offices are meeting the 30-day referral requirement. Federal internal control standards state that entities should use quality information to achieve objectives and should establish monitoring activities to evaluate results.<sup>15</sup> This would include tracking, collecting, and evaluating information on the extent to which regional offices meet OCR's 30-day requirement to refer certain complaints to EEOC, and how the process could be improved.

We recommended in our March 2024 report that Education track the number of days it takes regional offices to refer employment discrimination complaints to EEOC and use the information to develop a plan to reduce referral delays. Such a plan could include applying good practices from certain regional offices agency-wide, or reallocating resources.

Education agreed with our recommendation and stated that it will develop a system to track the number of days it takes to refer employment discrimination complaints to EEOC. Education said it will periodically review the new data to identify any effective measures to reduce referral times, and make appropriate changes, depending on available resources. We will continue to monitor Education's actions toward implementing this recommendation, which is critical to lessening the negative effects of delays on both higher education employees and employers.

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## EEOC Cannot Confirm Whether It Received and Handled All Referrals

EEOC could not confirm that it received all of OCR's referred employment discrimination complaints, as of October 2023.<sup>16</sup> Our analysis of EEOC and OCR complaint data found that EEOC's records did not reflect the same number of employment discrimination complaints that OCR's

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<sup>15</sup> GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014), principles 13 & 16.

<sup>16</sup> In addition to complaint referrals from OCR, EEOC may also receive complaint referrals from other federal entities.

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records indicated were referred. We found that OCR had referred more complaints to EEOC than EEOC recorded as received.

For example, we noted one recent complaint referred by OCR that EEOC did not initially record. OCR officials told us one of its regional offices emailed a complaint to an EEOC field office in November 2022, but it was not received by EEOC. This error was discovered months later when the complainant was told by EEOC that the complaint had never been received. In February 2023, OCR verified it had used the correct EEOC field office email address and re-sent the complaint for processing.

In response to this incident, OCR officials told us that in February 2023, the EEOC field office agreed going forward to confirm receipt of a complaint referral by sending an email back to OCR with an EEOC case number. However, the practice of confirming receipt of referrals is not consistent across EEOC field offices.

EEOC acknowledged that it still cannot confirm whether it has received and processed 100 percent of OCR's referrals. In response to our work, EEOC conducted an additional analysis of the OCR referrals; however, it still could not locate 33 referrals OCR had sent.

After receiving our preliminary findings, EEOC officials said that EEOC and OCR plan to formally communicate regarding complaint referrals and that EEOC will develop a protocol to document and track the referral of complaints from OCR to EEOC, including sharing lists of referrals. According to EEOC officials, such a protocol will enable EEOC to determine whether the agency has received all OCR referrals and follow up as needed. As of October 2023, EEOC was continuing to develop the protocol, but it had not been finalized.

Given EEOC's responsibilities for addressing employment discrimination complaints, it is essential for it to track and process all OCR complaint referrals. Further, federal internal control standards state that agencies should use quality information to achieve objectives, and should monitor and remediate any deficiencies within their control systems on a timely basis.<sup>17</sup>

We recommended in our March 2024 report that EEOC develop and finalize a protocol to ensure that its field offices receive and process all

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<sup>17</sup> [GAO-14-704G](#), principles 13, 16, and 17.

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complaint referrals from Education. The protocol could include: consistently documenting the referrals in its new data system; communicating regularly with Education on the number of complaint referrals Education sends to EEOC and the number EEOC receives from Education; and reconciling any differences in the number of complaints sent and received.

EEOC neither agreed nor disagreed with our recommendation, but stated the importance of ensuring that all referrals from Education's OCR are received and processed. EEOC stated that it adopted an interim protocol with OCR in November 2023 to ensure receipt of all complaint referrals from OCR. Specifically, OCR is to copy EEOC headquarters officials when it refers a complaint to the appropriate EEOC field office. According to EEOC, this allows it to maintain a complete and centralized record of all OCR referrals to determine if EEOC has received all OCR referrals and whether follow-up with OCR is needed. When this interim protocol is finalized, we will review it to determine if it meets the intent of our recommendation and helps ensure that EEOC receives and processes all complaint referrals from Education.

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Chairman Kiley, Ranking Member Adams, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

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## GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Melissa Emrey-Arras; Director; Education, Workforce, and Income Security; at (617) 788-0534 or [emreyarrasm@gao.gov](mailto:emreyarrasm@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony are Will Colvin (Assistant Director), Jose Altamirano, Ed Bodine, Andrea S. Dawson, Abby Marcus, Aaron Olszewski, Julie Phipps, and Adam Wendel. Additional contributors to the prior work on which this testimony is based are listed in our March 2024 report.



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