

Layoffs at the Dept. of Education May Impact Office for Civil Rights Enforcement

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On the evening of March 11, 2025, civil servants at the U.S. Department of Education’s offices in Washington, D.C. and throughout the country began receiving reduction in force notices.

The [Department announced](#) that affected staff are expected to be put on administrative leave starting March 21, 2025 and their last day will be June 9, 2025.

While the Department has reiterated the importance of colleges and universities complying with federal antidiscrimination laws, including Title VI, through recent [Dear Colleague Letters](#), [Q&As](#), and [enforcement actions](#) in recent weeks – one of the offices most heavily impacted by Tuesday’s workforce reduction was the Department’s Office for Civil Rights (OCR).

OCR is tasked with enforcing the following federal civil rights laws at colleges and universities that receive federal financial assistance (as well as public elementary and secondary schools):

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, and national origin;
- Title IX of the Education Amendments of 1972, which prohibits discrimination based on sex;
- Section 504 of Rehabilitation Act of 1973, which prohibits discrimination based on disability;
- Title II of the Americans with Disabilities Act, which prohibits discrimination based on disability by public entities; and
- The Age Discrimination Act of 1975, which prohibits age discrimination.

OCR enforces these laws through directed investigations and compliance reviews, but mostly by responding to and investigating complaints of discrimination filed by anyone who believes that a college or university has discriminated against someone based on race, color, national origin, sex, disability, or age.

By Wednesday, March 12, 2025, it was reported and confirmed by the Department of Education that the Department’s reduction in force materially impacted seven of OCR’s 12 regional offices. As a

result, OCR regional offices in Boston, New York, Philadelphia, Chicago, Cleveland, Dallas, and San Francisco may be closed. These regions investigate complaints against colleges and universities (and public elementary and secondary schools) in 25 states and 2 U.S. territories.

The impact is already being felt. Staff in the affected regional offices can receive emails, but can no longer respond to emails, make phone calls, or conduct video conference. Staff are expected to start administrative leave on or around March 21, 2025, and are supposed to have transferred their case loads to other career civil servants or political appointees by then.

On Thursday, March 13, 2025, Attorneys General from 20 states and the District of Columbia filed a lawsuit in federal court challenging the staff terminations at the Department of Education and requesting injunctive relief. In **State of New York, et al. v. McMahon, et al.**, 1:25-cv-10601 (D. Mass), among other claims, the states allege that the reduction in force will hobble the Department's ability to perform its statutorily-mandated functions, including enforcing federal civil rights laws.

Given that OCR announced **one day** before the reduction in force the importance of its Title VI antisemitism enforcement actions against 60 colleges and universities, key questions for colleges and universities in the affected regions are:

- Who do we contact about pending cases?
- Will scheduled meetings, interview, and on-site investigations go on as planned?
- Where do we send in the college's data response, if one is due?
- Will a pending case still be processed by OCR and what process will OCR use?

The last question is one that higher education and civil rights attorneys have been watching carefully. Colleges and universities are used to relying on [OCR's Case Processing Manual](#) (last updated February 19, 2025) to understand their rights and resolution options at the Office for Civil Rights. But what if OCR or the Department of Education is closed? Will responsibilities be transferred to the Department of Justice? Will individual states pick up oversight if one of their state laws apply? Or will complainants take their concerns not to a federal or state agency, but to a court?

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