

# MEMORANDUM

TO: Environmental Justice Advisory Council  
FROM: Jill Briggs Campbell, Deputy Secretary of Education  
SUBJECT: 2026 Environmental Justice and Civil Rights Complaint Report  
DATE: March 13, 2026

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## Purpose

The Vermont Agency of Education (AOE) is pleased to provide the Environmental Justice Advisory Council with the following report summarizing complaints alleging Title VI violations or Environmental Justice issues and any agency action taken to resolve the complaints, as required pursuant to 3 V.S.A. § 6004(d).

## Title VI Complaints

The AOE currently has several mechanisms to gather concerns and complaints (see Appendix A for a summary table). These mechanisms include both formal complaint processes and other channels through which members of the public may raise concerns related to agency programs, services, or potential civil rights issues.

In addition to the complaint systems listed in Appendix A, the AOE may also receive concerns or complaints through the Agency's general email inbox and main phone line. Communications received through these channels are reviewed and routed to the appropriate internal divisions or program areas for follow-up and resolution. This allows the Agency to direct concerns to staff with subject-matter expertise and ensures that issues are addressed in a timely manner.

Through the data collection mechanisms identified in Appendix A and the Agency's general intake channels, the AOE has not logged any complaints alleging violations of Title VI during the reporting period.

## Environmental Justice Complaints

At present, the AOE has not developed a formal environmental justice grievance or complaint intake and review process. As a result, the Agency has not received or logged any Environmental Justice complaints or concerns during the reporting period, and no actions have been taken to resolve such complaints.

However, the AOE recognizes the importance of establishing a more coordinated and transparent approach for receiving and tracking environmental justice concerns across state government. The Agency is participating in ongoing work led by the State's Environmental Justice Interagency Committee to develop a unified Environmental Justice complaint intake and management system.

As outlined in the Interagency Committee's workplan, the State is taking a phased approach to designing and implementing this system. This process includes reviewing existing complaint intake models used by other jurisdictions, assessing current complaint-handling practices across Vermont state agencies, and identifying common definitions, procedures, and data elements needed to support a consistent statewide process. The workplan also contemplates consultation with the Environmental Justice Advisory Council and evaluation of technical, staffing, and resource needs associated with developing a centralized intake mechanism.

AOE will continue to participate in the Interagency Committee's work to ensure that any future system provides a clear, accessible process for members of the public to raise environmental justice concerns and that agencies are able to document, track, and respond to those concerns in a consistent manner. As this work progresses, the Agency will incorporate any new statewide intake procedures or reporting requirements into its complaint-tracking practices.

## Appendix A: Concern & Complaint System at the Agency of Education

| Division                                        | Program                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Link                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Federal &amp; Education Support Programs</b> | EL Programs are responsible for educating the field about the Title VI requirements and assisting the field in attaining compliance. All parents should understand their rights and if a parent believes there is a violation, they are directed to report to the USED Office of Civil Rights (OCR). The FESP team is responsible for responding to questions and providing information upon request to OCR during investigations.                                                                                                                                                                                                                        | <a href="#">USED Office for Civil Rights How to file a Discrimination Complaint</a><br><br><a href="#">Title 34 Subtitle B Office for Civil Rights Nondiscrimination</a><br><br><a href="#">Civil Rights Requirements of the Federal Child Nutrition Programs</a><br><br><a href="#">Office for Civil Rights Disability Discrimination (ed.gov)</a> |
| <b>Child Nutrition</b>                          | The CN team must inform potential claimants of their rights to make a complaint and how to make a complaint, and/or assist them in filing the complaint with the USDA OCR. In addition, the team must maintain a confidential complaint log and assist USDA with any requests related to USDA's investigation of the complaint. We also monitor to ensure that all CN programs in the field post the "And Justice for All" poster which contains information about how to file a complaint, and that all programs maintain a Civil Rights complaint procedure and all program staff receive required annual Civil Rights training, which covers Title VI. | <a href="#">Civil Rights Requirements of the Federal Child Nutrition Programs</a>                                                                                                                                                                                                                                                                   |
| <b>Education Quality</b>                        | The Education Quality Assurance team is responsible for responding to questions and providing information upon request to OCR during investigations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <a href="#">USED Office for Civil Rights Education and Title VI</a>                                                                                                                                                                                                                                                                                 |

| <b>Division</b>                                        | <b>Program</b>                                                                                                                                                                                                                                                                                                                                                                           | <b>Link</b>                                                                                                                                                 |
|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Student Pathways/Adult Education &amp; Literacy</b> | Career Technical Education Team must proactively monitor Perkins recipients for compliance with Title VI.<br>Potential complainants are referred to OCR. Responsible for ensuring that grantees have met General Education Provisions Act (GEPA) requirements.                                                                                                                           | <a href="#">USED Office for Civil Rights Education and Title VI</a><br><br><a href="#">Race, Color, or National Origin Discrimination Overview (ed.gov)</a> |
| <b>Student Support Services</b>                        | Responsible for ensuring that grantees have met General Education Provisions Act (GEPA) requirements.                                                                                                                                                                                                                                                                                    | <a href="#">Race, Color, or National Origin Discrimination Overview (ed.gov)</a>                                                                            |
| <b>Finance</b>                                         | This Division does not collect, review, or provide oversight of Civil Rights complaints related to Environmental Justice or Title VI violations.                                                                                                                                                                                                                                         | N/A                                                                                                                                                         |
| <b>Communications</b>                                  | This Division does not collect, review, or provide oversight of Civil Rights complaints related to Environmental Justice or Title VI violations.                                                                                                                                                                                                                                         | N/A                                                                                                                                                         |
| <b>Operations</b>                                      | This Division does not collect, review, or provide oversight of Civil Rights complaints related to Environmental Justice or Title VI violations.                                                                                                                                                                                                                                         | N/A                                                                                                                                                         |
| <b>Data Management &amp; Analysis</b>                  | This Division does not collect, review, or provide oversight of Civil Rights complaints related to Environmental Justice or Title VI violations.                                                                                                                                                                                                                                         | N/A                                                                                                                                                         |
| <b>Legal</b>                                           | Title VI of the Civil Rights Act of 1964 prohibits discrimination in any/all federally funded programs. The alleged discrimination would be investigated by USED's OCR. Legal would be the contact if AOE were investigated by OCR. Legal does not track potential Title VI complaints distinct from other civil-rights related complaints. OCR does not require tracking of complaints. | N/A                                                                                                                                                         |

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| Division              | Program                                                          | Link                                                                                                                                               |
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| Regulatory Compliance | Postsecondary / State Authorization Reciprocity Agreement (SARA) | <a href="http://Complaint Resolution for Postsecondary Education (vermont.gov)">Complaint Resolution for Postsecondary Education (vermont.gov)</a> |

## Contact Information

For questions, please contact Bob Donohue, Agency of Education at [Bob.Donohue@vermont.gov](mailto:Bob.Donohue@vermont.gov).

