

HIGHER EDUCATION INFORMATION MEMO

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Title VI Coordinator Mandate for New York Colleges and Universities Signed into Law

As colleges and universities across New York welcome students back to campus this fall, New York State Gov. Kathy Hochul has signed into law a new requirement for all New York higher education institutions to appoint a Title VI Coordinator and undertake related training and notifications to their communities. The law, which had bipartisan backing in both legislative chambers (Senate Bill S4559B / Assembly Bill A5448B) and was signed into law on August 26, 2025, amends the New York Education Law by adding a new Section 6436-a to Article 129-A. The law is the first of its kind in the nation, going beyond even current federal mandates on Title VI of the Civil Rights Act of 1964, which do not, as of yet, specifically require all institutions to appoint a Title VI Coordinator.

The law comes on the heels of increased focus on Title VI and particularly its application to antisemitic incidents on campuses. Indeed, Governor Hochul specifically cited combating antisemitism in signing the bill, while also acknowledging other forms of bigotry. Title VI prohibits discrimination on the basis of race, color and national origin – including shared ancestry and ethnicity – in any program or activity of a federally funded school.

The new state law is not the first time New York has created requirements related to federal nondiscrimination law. Institutions are by now well familiar with the requirements of Article 129-B of the New York State Education Law, which covers institutional response to sexual assault, dating violence, domestic violence and stalking, thus overlapping with Title IX and the Violence Against Women Act (VAWA) amendments to the Clery Act.

Designation and Core Duties of Title VI Coordinator

Institutions must designate a Title VI Coordinator to serve as the central point of contact for coordinating and overseeing a centralized process for compliance with Title VI, akin to the role of Title IX Coordinators. The law does not prescribe the parameters on how the position is filled, but it permits the Title VI Coordinator to also have other duties. Institutions will likely need to assess the following to determine how to structure the role, including whether a full-time appointment (and, possibly, additional roles) may be necessary:

- historical incident volume;
- capacity in existing roles;
- reporting structures;
- existing procedures;
- alignment with processes for discrimination complaints involving other protected characteristics, as well as for employees; and
- the law's other new obligations.

The law specifically permits the appointment of designees and collaboration with other institutional employees to assist in compliance with the new requirements, but vests ultimate responsibility for compliance with the Title VI Coordinator. Although not specifically noted, designating one person to be both the Title IX and Title VI Coordinator could be compliant with the law.

The Title VI Coordinator has enumerated responsibilities under the new law once a discrimination or harassment report is received, which include:

- offering supportive measures to complainants;
- notifying students who report conduct that may implicate Title VI of the institution's policies and procedures; and
- ensuring there is a process for investigation and resolution of complaints consistent with obligations under both federal and state law.¹

The Title VI Coordinator is also required to establish and maintain appropriate recordkeeping, including records related to assessments of reports and actions taken in response, as well as records related to trainings (see below).

Annual Notification

Title VI Coordinators must notify all students and employees of the institution's policies and procedures for reporting discrimination and harassment each academic year. In crafting the annual notification and aligning with notifications on other covered forms of discrimination, institutions will need to ensure the annual notification covers each piece of information required by the new law, including:

- the college or university's nondiscrimination policy statement;
- links to relevant reporting policies and procedures;
- the Title VI Coordinator's contact information; and
- any other information the Title VI coordinator and the institution deem necessary.

Training

Additionally, institutions will be required to deliver annual training to all students and employees to "ensure institutional compliance." The law directs the New York State Division of Human Rights to coordinate with higher education institutions to develop a model training, though institutions will also be permitted to use their own equivalents. While this model training is being developed, institutions may wish to take stock of existing training requirements and the populations to whom such training is already delivered, as well as begin planning for the logistical aspects of delivering training to their communities.

Separately, Title VI Coordinators and any designees are required to undergo training on Title VI and the responsibilities of the new state law.

Timing

The law becomes effective one year from its enactment (i.e., August 26, 2026). Once effective, institutions have 90 days to appoint a Title VI Coordinator. Training obligations begin the first full academic year after the effective date (i.e., academic year 2026-27). While this timeline provides a long runway for institutions to implement the law's requirements, given the heightened enforcement focus on Title VI, institutions may wish to consider which elements of the law can be implemented sooner to help promote compliance with Title VI as well as state nondiscrimination laws.

If you have questions about these new requirements, require assistance in developing training programs for Title VI Coordinators or have other questions related to Title VI and nondiscrimination issues, please contact [Brittany Schoepp-Wong](#), [Camisha Parkins](#) or any attorney in Bond's [Higher Education practice](#).

¹ Of note, institutions' obligations under Title VI have been largely defined through Dear Colleague Letters, investigations, and resolution agreements by the U.S. Department of Education's Office for Civil Rights; the federal government has not, to date, promulgated regulations specifically governing the procedures that apply to Title VI investigations akin to the Title IX regulations.

