



UNITED STATES DEPARTMENT OF EDUCATION

**OFFICE FOR CIVIL RIGHTS
ADMINISTRATIVE COMPLAINT**

May 16, 2022

United States Department of Education
Office for Civil Rights
Lyndon Baines Johnson Department of Education Building
400 Maryland Avenue, SW
Washington, DC 20202-1100
Via Email: OCR@ed.gov

To Whom It May Concern:

This is a federal civil-rights complaint pursuant to the U.S. Department of Education's Office for Civil Rights' discrimination complaint resolution procedures.

Parents Defending Education (PDE) brings this complaint against Avonworth School District in Allegheny County, Pennsylvania for discrimination on the basis of race, color, or national origin in programs or activities that receive Federal financial assistance in violation of both Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d *et seq.*, and the Equal Protection Clause of the 14th Amendment of the U.S. Constitution.

PDE makes this complaint as an interested third-party organization that opposes racial discrimination and political indoctrination in America's schools. Attached to this complaint is supporting evidence in the form of an equity audit conducted by Insight Education Group, which was presented to the school board on April 5, 2022 (Exhibit A). The cost of the audit—\$19,500—was approved at a board meeting on June 14, 2021 (Exhibit B).

Insight Education Group's audit was conducted through data analysis, surveys of 505 participants, and focus groups of 81 participants. The audit's findings reveal problems in the district that merit investigation. Insight Education Group recommended that Avonworth "[d]evelop a specific planning process at the district office and in schools to mitigate the disproportionalities discovered in the data review." (Exhibit A, page 18). In other words, Insight's data analysis *discovered* disproportionalities based on race – something that warrants this Office's review.

For example, the audit quotes one school official: "We are at 5% minority but for students transferring in that number is around 29% minority. In reviewing my discipline data, I noticed new students came to the office at a disproportionate rate." (Exhibit A, page 23)

Furthermore, the audit implies that the district may have engaged in racially discriminatory hiring practices, recommending that "all district leaders ... reflect on their personal biases and how these



factors may be impacting their decisions regarding recruitment, retention, and advancement of staff of color.” (Exhibit A, page 29)

Finally, the audit recommends that the district “build[] structural, individual, and collective consciousness among all staff regarding biases the ways in which they undermine equitable education for students,” which again means that staff members are currently undermining equitable education due to racially discriminatory bias. (Exhibit A, page 30)

In light of these multiple concerning statements included in the district’s commissioned equity audit, we ask that the Department promptly investigate the allegations in this complaint, act swiftly to remedy unlawful policies and practices, and order appropriate relief.

Thank you for your prompt assistance with this request for investigation and resolution. Please contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Neily". The signature is fluid and cursive, with a large loop at the end of the last name.

Nicole Neily
President
Parents Defending Education

Enc. Exhibit A-B



EXHIBIT A:
Insight Education Group Equity Audit
March 2022



EXHIBIT B:
Avonworth School District
June 14, 2021 Board Minutes