



**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](mailto: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 Jackson Public School District in Jackson, Michigan 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 14<sup>th</sup> 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 Ajusted Equity Solutions in 2019 (Exhibit A).

Ajusted Equity Solutions' audit was conducted through both quantitative and qualitative research analysis – specifically, survey administration and online data analysis. The audit's findings reveal problems in the district that merit investigation.

The audit asserts: “there are low perceptions that discriminatory behaviors and practices exist. But this finding can be read in another way: that stakeholders are not aware of discrimination that we know is there (from district data and other aspects of this report). Another noteworthy mention was that there was great difference between races and language groups. This suggests that minoritized families experience more discrimination in the district, than traditional White families.” (Exhibit A, page 12)

Furthermore, the audit notes “it seems as though minoritized parents feel more so than White parents that the climate is poor,” and recommends “reaching out to local Indigenous Native American groups and other community based groups within the Black and Latinx communities in the area” to address the district's shortcomings. (Exhibit A, page 16)

When the audit asked whether “White students are disciplined more or less than minority students in this school,” 20% of administrators responded, “Much less” and noted that this “suggests that Staff did see themselves as contributing to the over-disciplining of specific groups of students.” It continues, “The data



here suggests that stakeholders recognize: a.) that students are treated differently based on race or other factors, and b.) that there is a discipline gap (i.e., are disciplined differently even when they commit similar or like offenses).” (Exhibit A, page 28) Related to this point, the audit says “studies show that teacher biases are the reason that some groups of students are more likely to be more punished in school,” and recommends the district “[r]evisit[] other disciplinary policies that target minoritized students.” (Exhibit A, page 71)

The report’s conclusion asserts “The Equity Audit conducted for your district revealed institutionalized inequities between the educational experiences and well being of students in the district. In addition to perceiving differences in access to academic opportunities, the audit also documented that some students felt unsafe and targeted for disciplinary actions in their schools and classrooms.” (Exhibit A, page 66) It noted that “minoritized” students “feel marginalized within the district where White culture is celebrated as the norm and reinforced with an overall colorblind approach by many teachers in the classroom.” (Exhibit A, page 67)

Perhaps most shockingly, the audit also says “In your district, minoritized students expressed that they are not treated equally within the school system, and at times students are labeled into categories they are unable to discard. Many White students reported that, in their view, teachers discriminated against minoritized students in their classes. Some students reported that they were often teased or shamed for speaking their native language among their friends. This Equity Audit data strongly aligns with other district data that suggests the presence of discriminatory practices, such as academic and disciplinary disparities,” (Exhibit A, page 69) and recommends that “[s]chool and district leadership must be more explicit about resisting oppression of minoritized students both in words and action.” (Exhibit A, page 70)

In light of the data uncovered by the district’s commissioned equity audit, we ask that the Department promptly investigate the allegations in this complaint, act swiftly to remedy any unlawful policies and practices, and order appropriate relief. These disparities could have race-neutral explanations. But Jackson Public School District has provided none. And its decision to conduct an “equity audit” suggests that, in Jackson’s view, these disparities stem from racism inside the school district.

We formally request that this department’s timeliness requirement be waived because PDE just recently learned the information about this district. As the department knows, racial discrimination is unique and in the district’s case the discrimination appears to be ongoing and systemic.

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

Sincerely,

Nicole Neily  
President  
Parents Defending Education

Enc. Exhibit A



**EXHIBIT A:**  
**Ajusted Equity Solutions Equity Audit**