



January 15, 2025

Michelle Eisele, Director
Indianapolis District Office
115 W. Washington St.
South Tower Suite 600
Indianapolis, IN 46204

Re: Investigation Request/Middletown City School District

Dear Director Eisele:

Under 29 C.F.R. §1601.6(a), Parents Defending Education (PDE) files this request to investigate Middletown City School District in Middletown, Ohio for employment discrimination on the basis of race, color, religion, sex, or national origin in violation of Title VII of the 1964 Civil Rights Act, 42 U.S.C. §2000e *et seq.*¹

PDE makes this investigation request as an interested third-party organization with members who are parents of school children throughout the country.² PDE and its members oppose racial discrimination and political indoctrination in America's schools. Middletown City School District is offering educational and affinity group programming for Black male employees that are not offered to all employees in the District. Attached to this complaint is evidence in the form of an X (formerly Twitter) profile page managed by Middletown City Public Schools, which shows the District's commitment to "the Admiral squad" (Exhibit A)³, a Facebook group page managed by Middletown City Public Schools, which promotes "admiral squad" affinity group (Exhibit B)⁴, a District webpage titled "The Admiral Squad," which explains the purpose and intention of the educator affinity group (Exhibit C),⁵ and a District documents titled "Showcasing how Districts and Communities are Transforming Education" (Exhibit D), which specifically mentions increasing Black male teachers by 50% over five years and outlines the District's fellowship program that is only accessible to Black males.⁶

Exhibit A shows "The Admiral Squad" was established in Middletown City School District in 2022 (Ex. A). The District recognizes "the Admiral Squad" as an affinity group for "Black male educators" (Ex. C). The affinity group appears to wear matching attire and visit different schools throughout the District. The affinity group is solely comprised of Black male educators (Ex. A). Since the beginning of the 2024-2025

¹ Copies of this letter are also addressed to each member of the Commission, and Parents Defending Education makes the same request of them under 29 C.F.R. §1601.6(a).

² PDE has also asked the U.S. Department of Education's Office for Civil Rights to investigate.

³ "Middletown City School District," Accessed 10/25/24, <https://www.facebook.com/MiddletownCitySchools/posts/pfbid02WLq9MrHxUnpnJetcECGKCJ6cQdNrQuJktBuJqCwULmvevgtE5shJ8eXQxG358cxDI>

⁴ "@The Admiral Squad, Accessed 10/25/24, x.com/theadmiralsquad

⁵ "The Admiral Squad," Accessed 10/25/2024, <https://www.middletowncityschools.com/middletown-middle-school-news/entry/the-admiral-squad/>

⁶ "Showcasing how Districts and Communities are Transforming Education," Accessed 10/25/2024, https://digitalpromise.org/wp-content/uploads/2023/12/DigP_JourneyMap_BlkmFellowship_Final.pdf



academic year began, “The Admiral Squad has visited Rosa Parks Elementary School, Central Academy, Creekville Elementary School, Amanda Elementary School, Mayfield Elementary School, and Highview 6th Grade Center” (Ex. A).

The District’s website establishes that a primary purpose of this educator affinity group is to have “an affinity group for Black men in the District” (Ex. C at 1). The District hopes this affinity group will “inspire more Black males to enter the education profession while giving support to one another” (Ex. C at 1).

Furthermore, Middletown City School District webpage notes the District’s “goal to hire 25 Black male classroom teachers” over the “next five hiring seasons” (Ex. C at 1). Exhibit D shows the goal for the District is to increase the number of Black male educators by 50% over five years.

The hiring and retention model proposed by the District is as follows (Ex. D):

- “developing a diverse pipeline”
- “fellowship for Black and Brown candidate student members”
- “50% increase in the number of Black male educators from 32 to 52”
- “work with He is Me Institute, which offers a fellowship to support Black males in high school and college who are interested in becoming teachers”

The District has even committed to working with nearby universities to target, hire, and retain Black male classroom educators (Ex. C at 1). The District has even outline partnerships with nearby universities to help them meet this goal. The District plans to recruit Black male classroom teachers from “Mount St. Joseph University,” “Wright State University,” “Central State University,” “Sinclair Community College,” and “University of Dayton” (Ex. C at 1).

In addition to membership meetings and outings associated with this affinity group, “The Admiral Squad” has a robust social media presence, detailing the group’s activities. The group’s activities are not limited to District field trips. The Admiral Squad also attends a wide range of educator trainings and conferences across the state and throughout the country. For instance, affinity group members attended the “Educator of Color” affinity group iNSPIRE Summit hosted by the Hamilton County Educational Service Center and the “Midwest Black Male Educator Summit” earlier this year (Ex. A at 6-7).

As for additional benefits such as fellowships, scholarships, conference attendance, mentorship, and recruitment for Black male classroom teachers, that too confers a benefit that is not open to all educators.

As the Commission is aware, “the important purpose of Title VII” is “that the workplace be an environment free of discrimination, where race is not a barrier to opportunity.” *Ricci v. DeStefano*, 557 U.S. 557, 580 (2009). Specifically, Title VII declares that it is an “unlawful employment practice” (1) “to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual’s [protected characteristic]”; or (2) “to limit, segregate, or classify his employees or applicants for employment in any way which would ... adversely affect his status as an employee, because of such individual’s [protected characteristic].” 42 U.S.C. §2000e-2(a). Title VII “prohibits even making a protected characteristic a ‘motivating factor’ in an employment decision.” *EEOC v. Abercrombie & Fitch Stores, Inc.*, 575 U.S. 768, 773 (2015) (quoting 42 U.S.C. §2000e-2(m)). But here, Acalanes Union High School appears to be intentionally discriminating against its employees because of their race by making race a barrier to opportunity.



A 2015 decision issued by the Department of Education's Office for Civil Rights (OCR) during the Obama Administration is instructive. When a Chicago-area high school held a "Black Lives Matter" assembly during Black History Month "for African American students only," OCR concluded the school violated the Equal Protection Clause and Title VI. *See* Sept. 29, 2015 Letter (OCR Docket #05-15-1180). The school's desire "to provide a comfortable forum for black students to express their frustrations" could not justify the school's exclusion of white students, who were told they could not participate. OCR concluded that the district failed to "assess fully whether there were workable race-neutral alternatives" and "did not conduct a flexible and individualized review of potential participants." In a Resolution Agreement with OCR, the district agreed that its programs and activities would be "open to all students ... regardless of their race" and to adopt policies and training to ensure the district's compliance. OCR imposed these requirements even though the district had promised "not to hold such events in the future."

Middletown City School District likewise cannot discriminate against its employees based on their race. We ask that your office 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,

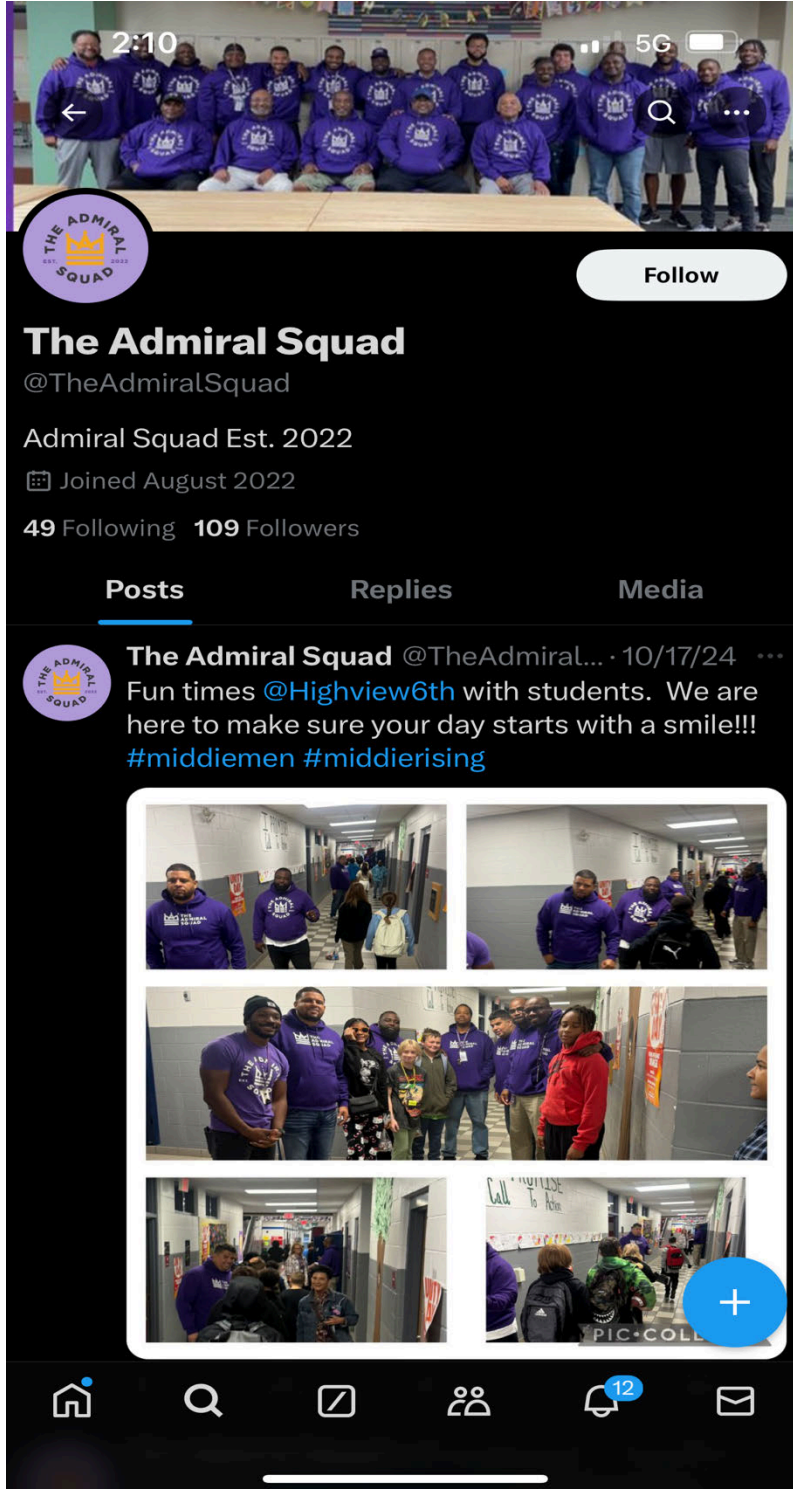
Caroline Moore
Vice President
Parents Defending Education

Enc. Exhibit A-D

Cc: The Honorable Charlotte A. Burrows, Commission Chair
The Honorable Jocelyn Samuels, Commission Vice Chair
The Honorable Andrea R. Lucas, Commissioner
The Honorable Kalpana Kotagal, Commissioner



Exhibit A



Ex. A at 1



Ex. A at 2

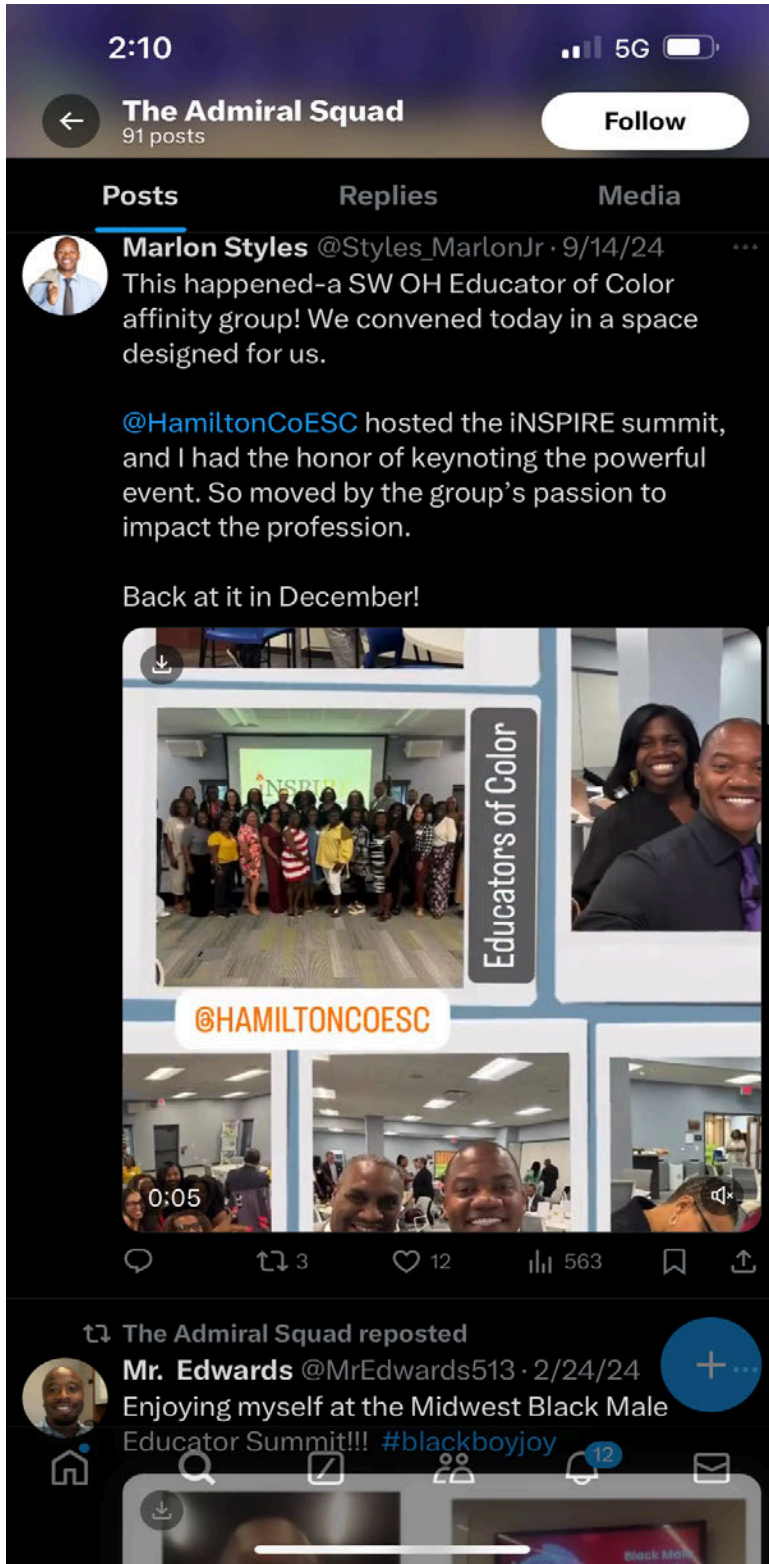


Ex. A at 3



Ex. A at 4





Ex. A at 6

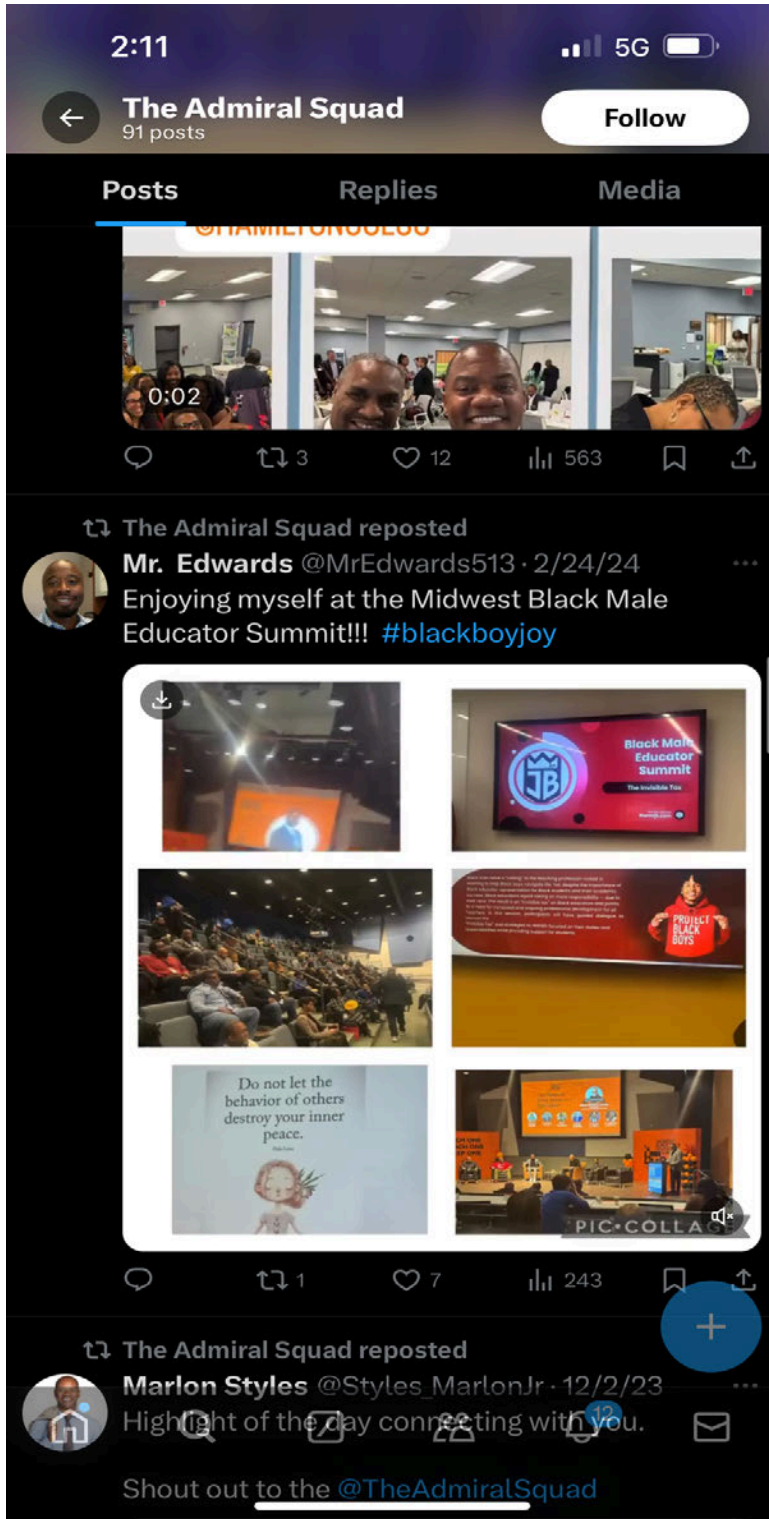




Exhibit B

facebook


https://www.facebook.com/MiddletownCitySchools/posts/pfbid02WLq9MrHxUnpnJeteECGKCJ6cQdNrQuJktBuJqCwULmvevgtE5shJ8eXQxG358cxDI

Email or phone Password Log In Forgot Account?

Middletown City Schools
4d · 🌐

👏 The Admiral Squad, our affinity group for Black male educators, greeted students at [Mayfield Elementary](#) with warmth and positivity as they arrived at school last week.

💜 Their presence is a reminder of the importance of representation in education!
[#MiddleRising](#)



Log in or sign up for Facebook to connect with friends, family and people you know.

Log In or Create new account



Exhibit C



THE ADMIRAL SQUAD



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[Back To Middletown Middle School News](#)

SEP 8, 2022

Middletown City School District is working to address the shortage of Black males in education. This week we are introducing The Admiral Squad, an affinity group for Black males in our district. The Admiral Squad will inspire more Black males to enter the education profession while giving support to one another and all Middies.

Over the next five hiring seasons, our goal is to hire 25 Black male classroom teachers. We've been working with Mount St. Joseph University, Wright State University, Central State University, Sinclair Community College, University of Dayton, and more.

We look forward to sharing out more about this group and what they are doing for our district. Make sure to follow them on [Twitter](#) and [Instagram](#)!



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- [MVP: Middle Virtual Program News](#)

Schools

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[Maufield Elementary](#)



Exhibit D

digitalpromise.org/wp-content/uploads/2023/12/DigP_JourneyMap_BlkmFellowship_Final.pdf

Relaunch to update

DigP_JourneyMap_BlkmFellowship_Final.pdf

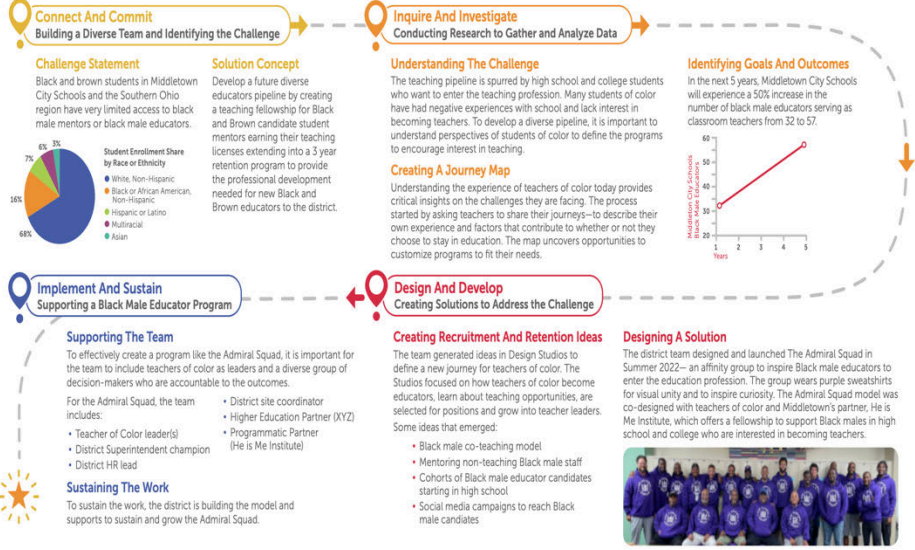
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Center for Inclusive Innovation | **Digital Promise** | **Showcasing How Districts and Communities are Transforming Education**

Creating a Fellowship to Increase Black Male Educator Recruitment and Retention

MIDDLETOWN CITY SCHOOL DISTRICT | District Name: Middletown City Schools | District City, State: Middletown, OH | Superintendent: Deborah Houser

"I figured I could still get a job in education. I started as a paraprofessional. I was thinking 'Is this still what I want to do?' The answer was yes."



Connect And Commit

Building a Diverse Team and Identifying the Challenge

Challenge Statement
Black and brown students in Middletown City Schools and the Southern Ohio region have very limited access to black male mentors or black male educators.

Solution Concept
Develop a future diverse educators pipeline by creating a teaching fellowship for Black and Brown candidate student mentors earning their teaching licenses extending into a 3 year retention program to provide the professional development needed for new Black and Brown educators to the district.

Student Enrollment Share by Race or Ethnicity


White, Non-Hispanic	68%
Black or African American, Non-Hispanic	16%
Hispanic or Latino	8%
Multiracial	7%
Asian	1%

Inquire And Investigate

Conducting Research to Gather and Analyze Data

Understanding The Challenge
The teaching pipeline is spurred by high school and college students who want to enter the teaching profession. Many students of color have had negative experiences with school and lack interest in becoming teachers. To develop a diverse pipeline, it is important to understand perspectives of students of color to define the programs to encourage interest in teaching.

Identifying Goals And Outcomes
In the next 5 years, Middletown City Schools will experience a 50% increase in the number of black male educators serving as classroom teachers from 32 to 57.



Creating A Journey Map
Understanding the experience of teachers of color today provides critical insights on the challenges they are facing. The process started by asking teachers to share their journeys—to describe their own experience and factors that contribute to whether or not they choose to stay in education. The map uncovers opportunities to customize programs to fit their needs.

Implement And Sustain

Supporting a Black Male Educator Program

Supporting The Team
To effectively create a program like the Admiral Squad, it is important for the team to include teachers of color as leaders and a diverse group of decision-makers who are accountable to the outcomes.
For the Admiral Squad, the team includes:
• Teacher of Color leader(s)
• District Superintendent champion
• District HR lead

- District site coordinator
- Higher Education Partner (XYZ)
- Programmatic Partner (He is Me Institute)


Sustaining The Work
To sustain the work, the district is building the model and supports to sustain and grow the Admiral Squad.

Design And Develop

Creating Solutions to Address the Challenge

Creating Recruitment And Retention Ideas
The team generated ideas in Design Studios to define a new journey for teachers of color. The Studios focused on how teachers of color become educators, learn about teaching opportunities, are selected for positions and grow into teacher leaders. Some ideas that emerged:
• Black male co-teaching model
• Mentoring non-teaching Black male staff
• Cohorts of Black male educator candidates starting in high school
• Social media campaigns to reach Black male candidates

Designing A Solution
The district team designed and launched The Admiral Squad in Summer 2022—an affinity group to inspire Black male educators to enter the education profession. The group wears purple sweatshirts for visual unity and to inspire curiosity. The Admiral Squad model was co-designed with teachers of color and Middletown's partner, He is Me Institute, which offers a fellowship to support Black males in high school and college who are interested in becoming teachers.



digitalpromise.org/inclusive-innovation