



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS  
ADMINISTRATIVE COMPLAINT

January 9, 2025

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 (Department) Office for Civil Rights' (OCR) discrimination complaint resolution procedures.

Parents Defending Education (PDE) brings this complaint against District of Columbia Public Schools in Washington, DC for discrimination on the basis of race 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 to the U.S. Constitution.

PDE makes this complaint as an interested third-party organization with members who are parents of school children throughout the country. PDE and its members oppose discrimination on the basis of race and political indoctrination in America's schools. District of Columbia Public Schools has affinity group programming that is not open to all students. The District allows only some students to participate in affinity group programming and participation is based on their race.

Attached to this complaint is evidence in the form of an "Empowerment Club" flyer, which describes a student affinity group for Black girls (Exhibit A) and a permission slip for the Empowerment Club, which outlines the affinity group programming and how it specifically targets first through fifth graders (Exhibit B)<sup>1</sup>.

Exhibit A clearly states the Empowerment Club affinity group is geared toward "Black girls who identify as Black, African, African American, biracial, or part of the African diaspora and nonbinary students." The flyer further explains Black girls in the affinity group will broaden their skillset to include: "empowerment," "creativity," and "community" (Ex. A).

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<sup>1</sup> "Empowerment Club," Accessed 11/20/2024, [https://forms.office.com/Pages/ResponsePage.aspx?id=7kagKk6zM0qSt5md8rwKMoxyl\\_-FkVJqu0oQmv8FdUMk9UOfdFMk1KOTUyNUJVVEFTN0xVTjE2US4u&origin=QRCode](https://forms.office.com/Pages/ResponsePage.aspx?id=7kagKk6zM0qSt5md8rwKMoxyl_-FkVJqu0oQmv8FdUMk9UOfdFMk1KOTUyNUJVVEFTN0xVTjE2US4u&origin=QRCode)



Moreover, the Empowerment Club’s outreach hinges on students as young as seven years old, who need afterschool care (Ex. A). The affinity group membership is for “1<sup>st</sup> – 5<sup>th</sup> grade Black girls” (Ex. A). The eight-week enrichment programming occurs from 3:30 PM until 4:30 PM on Wednesday afternoons and promises “safe” and “supportive” space for Black girls (Ex. A).

While the permission gives the illusion that all students are able to participate, the flyer confirms the “leadership, self-confidence, and personal growth among students” advertised is not accessible to the entire student body (Ex. B). Instead, the group is only for “1st grade - 5th grade Black girls who identifies as Black, African, African-American, biracial, or part of the African diaspora and nonbinary students” (Ex. B).

The group provides additional benefits, such as “leadership,” “creative projects,” “self-expression,” and “community” outreach, and the benefits are available on the basis of race and are not offered to all students in the District.

As the Department of Education is no doubt aware, discrimination on the basis of race raises concerns that District of Columbia Public Schools has received federal funds in violation of Title VI of the Civil Rights Act of 1964, which declares that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

In addition, Section 1 of the 14th Amendment to the U.S. Constitution asserts: “No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.” On these grounds, the Supreme Court held in 1954 that racial segregation of students is unconstitutional. *Brown v. Board of Education of Topeka*, 347 U.S. 483 (1954).

A September 29, 2015 decision from the Department of Education Office for Civil Rights during the Obama Administration is directly on point: in 2015, following “the police actions involving African American victims in Ferguson and New York and subsequent events,” Oak Park & River Forest High School District 200 held a “Black Lives Matter” assembly during Black History Month. The assembly was convened “for African American students only” because the district wanted “to provide a comfortable forum for black students to express their frustrations.” Certain students “who self-identified as white were directed by District officials not to participate in the event as this assembly was designed for students who self-identify as black.” In the letter sent on September 29, 2015 (OCR Docket #05-15-1180), OCR found that the district violated the Equal Protection Clause and Title VI because the district’s actions could not withstand strict scrutiny. Specifically, 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."

Accordingly, 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 that reads "Caroline Moore".

Caroline Moore  
Vice President  
Parents Defending Education


Enc. Exhibits A-B



## Exhibit A



# EMPOWERMENT CLUB




## WHAT?

A weekly afterschool club for 8 weeks that focuses on:


- Empowerment: Build confidence, leadership, and self-esteem.
- Creativity: Enjoy fun, creative projects that encourage self-expression.
- Community: Connect with peers in a safe, supportive space.

## WHO?

1st grade - 5th grade Black girls who identifies as Black, African, African-American, biracial, or part of the African diaspora and nonbinary students.



## WHEN?



WEDNESDAYS 3:30pm - 4:30 pm

### 1st -2nd grade

December 4th  
December 11th  
Decemer 18th  
January 2nd  
January 8th  
January 15th  
January 22nd

### 3-5 grade

November 20th  
December 4th  
December 11th  
Decemer 18th  
January 2nd  
January 8th  
January 15th  
January 22nd



Complete the permission slip and return:

Ms. Thompson


takiyah.thompson@k12.dc.gov

Ms. Prince

beth.prince@k12.dc.gov



## Exhibit B



## Empowerment Club

We are excited to announce that your child has the opportunity to participate in the Empowerment Club! This club is designed to promote leadership, self-confidence, and personal growth among students.

**Event Details:**

- **Meeting Frequency:** 1x per week on Wednesdays
- **Location:** Library

\*Students will dismiss with aftercare and a teacher will pick them up from the gym.

- **Time:** 3:30-4:30pm
- **Duration:** 1 hour
- **Start Date:** 1st grade and 2nd grade- Wednesday, November 4th, 2024

3rd grade, 4th grade, and 5th grade – Wednesday, November 20th, 2024

- **End Date:** Wednesday, January 22nd, 2025

1.

Ex. B at 1

2. Student Grade Level

1st grade

2nd grade

3rd grade

4th grade

5th grade

3. Parent Name

Enter your answer

4. Parent Phone Number

Enter your answer

5. Parent email address

Enter your answer

6. Question



6. Question

I give permission for my child, to participate in the Empowerment Club. I understand that the club will meet

regularly and that my child will be involved in various activities aimed at building community, friendship, leadership, and self-confidence.

I DO NOT give permission for my child to participate in the Empowerment Club.

7. Please list any medical concerns or allergies your student has:

Enter your answer

8. Alternate Contact Name and Phone number

Enter your answer

You can print a copy of your answer after you submit

Submit

Never give out your password. [Report abuse](#)