PROTECT *the* PUBLIC'S TRUST

Submitted via email December 15, 2025

U.S. Department of Education
Office for Civil Rights (OCR)
400 Maryland Ave., SW
Washington, DC 20202
Email: OCR@ed.gov

U.S. Department of Health and Human Services
Office for Civil Rights
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
Email: OCRPrivacy@hhs.gov

U.S. Department of Justice
Civil Rights Division
Attention: Title VI Legal Manual Coordinator
P.O. Box 66560
Washington, D.C. 20035-6560
Email: COR.CRT@USDOJ.GOV

Re: Title VI Complaint Against Burlington School District, Burlington, Vermont

To Whom it May Concern,

I write to you to alert you of an ongoing effort by the Burlington School District (BSD), to continue their practice of imposing Diversity, Equity, and Inclusion (DEI) on their students. As reported in the *Daily Caller* on November 19, 2025, the BSD "has found a new code word to sneak its diversity, equity and inclusion (DEI) commitment into its hiring process and continue racially discriminating while

skirting federal directives."[1] The code word, "Global Majority," appears in the 20-page 2022 – 2027 BSD strategic plan 13 times.[2]

DEI is inherently discriminatory and runs afoul of Title VI of the Civil Rights Act. The BSD strategic plan is clearly framed in a way to attempt to mask its violations of civil rights law. At least as recently as February 2025, the BSD board reported on their progress on implementing the strategic plan.[3] Accordingly, we request that you promptly investigate the Burlington School District's potential violations.

I. Who We Are

Protect the Public's Trust (PPT) is a nonpartisan organization dedicated to promoting ethics in government and restoring the public's trust in government officials. It is imperative in light of severe social challenges America has suffered in the last several years that institutions, especially educational institutions, maintain their credibility with the American people. Educational institutions should be held accountable to ensure that their primary purpose, education, is maintained. There is no place in education for inherently discriminatory curriculum, decision-making, admissions, or campus access.

II. Background

DEI is an amorphous term, but it generally focuses on prioritizing opportunities for specific classes of people. The Center for Racial Equity in Education, for example, defines it as "a set of principles and practices aimed at creating fair, respectful, and inclusive environments. DEI efforts seek to acknowledge and address systemic inequalities, promote equitable opportunities and representation, and create spaces where every individual can thrive and be reflected regardless of their age, race, religion, ethnicity, gender, sexual orientation, and mental or physical ability."[4]

---

[1] Jaryn Crouson, "EXCLUSIVE: School District Deploys New Dog Whistle To Keep Race-Based Hiring," Daily Caller, November 19, 2025, https://dailycaller.com/2025/11/19/exclusive-school-district-deploys-new-dog-whistle-to-keep-race-based-hiring/.

[2] Ibid.

[3] Burlington School District, "February 2025 School Board Report," Canva, accessed December 3, 2025, https://www.canva.com/design/DAGbuGZyb7U/JpvyCy6Is6ZmkB9H7oma8w/view?utm_content=DAGbuGZyb7U&utm_campaign=designshare&utm_medium=link2&utm_source=uniquelinks&utlId=h4061b6e603#1.

[4] "DEI in Education," Center for Racial Equity in Education, accessed December 3, 2025, https://www.creed-nc.org/unc-diversity-equity-inclusion.

The effort, guised as "equity," means that perceived unequal classes of people, receive more opportunity and more access than those who are not perceived as unequal. In practice this means that minority students will receive opportunities that white students do not. This effort is, by definition, discriminatory.

"Global Majority" is a new way to say non-white. The BBC explained this new term last year:

> Global majority refers to people who are "black, Asian, brown, dual-heritage, indigenous to the global south, and or have been racialised as 'ethnic minorities'" and "represent approximately 80% of the world's population", according to educator and activist Rosemary Campbell-Stephens, who coined the term.[5]

The national grassroots group *Defending Education* offers this summary of the BSD strategic plan:

> The Burlington School District's (VT) strategic plan features diversity, equity and inclusion (DEI) hiring metrics such as increasing the "percentage of faculty (teachers and principals) of the global majority each year and ensure that every school has multiple staff of the global majority" and increasing the **"percentage of students of the global majority who say they see educators who look like them."** The district also appears to be facilitating "groups of cultural relevance, (formerly known as 'affinity groups')."[6]

The 2022 – 2027 Strategic Plan of the BSD does not mention merit or achievement.[7] It calls for using metrics that single-out the responses of pupils of the "global majority."[8] It calls for increasing the percentage of the "global majority" enrolled in advanced placement and other challenging courses.[9] It seeks an "increase in the percentage of students of the Global Majority who are enrolled" in challenging course work like AP classes, honors classes, and dual enrollment.[10] It calls for the course enrollment process to be examined and revised to include "multiple checks

---

[5] Nicola Bryan, "Should we drop ethnic minority for global majority?," BBC, October 20, 2024, https://www.bbc.com/news/articles/c981g43vmmro.
[6] Incident Report: Burlington School District, Defending Education, November 19, 2025, https://defendinged.org/incidents/burlington-school-districts-strategic-plan-includes-dei-hiring-metrics-that-aim-to-increase-the-percentage-of-faculty-teachers-and-principals-of-the-global-majority-and-appears-to-be-facilitat/.
[7] Burlington School District, "Strategic Plan 2022 – 2027," accessed November 21, 2025, https://www.bsdvt.org/wp-content/uploads/2022/05/BSD-Strategic-Plan-2022-2027.pdf.
[8] Ibid. 11.
[9] Ibid. 15.
[10] Ibid.

and balances for equity."[11] This means that the school district is using race as a factor for attention given to students and participation in advanced classes, and that it uses metrics for success that are based upon race. "Global majority" is DEI by another name.

III. Analysis

Title VI of the Civil Rights Act of 1964[12] states 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."[13] Thus, it violates federal statute when a school district extends priority to one race over another.

Consistent with Title VI, the Department of Education promulgated rules that also prevent race-based criteria in education. Education programs that "treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition…in order to be provided…benefit provided under the program" is discrimination.[14]

Indeed, in the context of race, the Supreme Court recently found that the University of North Carolina system's practice of considering race when making admissions decisions violated the Equal Protection Clause and Title VI of the Civil Rights Act.[15] The Opinion of the Court, as delivered by Chief Justice John Roberts, declared, "Eliminating racial discrimination means eliminating all of it." Discrimination cannot be justified by a racial classification system "that imposes disadvantages upon persons…who bear no responsibility for whatever harm the beneficiaries of the [race-based] admissions program are thought to have suffered."[16]

The reasoning was broad, which means it applies to more than just admissions practices. Schools "may never" use a racial "stereotype or negative."[17] Second, "distinctions between citizens solely because of their ancestry are by their very nature odious to a free people whose institutions are founded upon the doctrine of

---

[11] Ibid. 15.
[12] 42 U.S.C. §§ 2000d et seq.
[13] 42 U.S.C. § 2000d.
[14] 34 C.F.R. 100.3(b)(v).
[15] *Students for Fair Admissions v. President and Fellows of Harvard College*, 143 S.Ct. 2141 (2023)("*SFFA*").
[16] *Id*. at 2174, *quoting Regents of the University of California v. Bakke*, 438 U.S. 265, 362 (1978).
[17] *SFFA* 2166.

equality."[18] To do this invokes strict scrutiny, to which the goal of "diversity" does not pass.[19]

The Burlington School District (Burlington, Vermont) is clearly continuing its practice of imposing DEI on its pupils. Creating initiatives designed to help minority students—not white students—get ahead is inherently discriminatory. No metrics that benefit or harm a student on the basis of race can pass scrutiny under Title VI and the Department of Education's regulations consistent with Title VI. It is no matter whether the discriminatory practices are official and transparent or are done in the shadows and in secret. Discrimination is discrimination.

An investigation is warranted to determine the extent of discrimination that is occurring within the Burlington School District. The Department of Education should hold the Burlington School District accountable to the extent the Department deems appropriate.

For the record, I give OCR my consent to disclose my name and other personal information contained in this Title VI and IX complaint to others for OCR's investigation of, and enforcement activities related to, the complaint. I am not interested in participating in early mediation. I do not have an attorney representing me in this matter. I have not complained about these allegations to any school, school district, school board, the State of Vermont, or any other state or federal agency.

Sincerely,

Michael Chamberlain
Director
Protect the Public's Trust

[redacted]

[18] *Id.* at 2150, quoting *Rice v. Cayetano*, 528 U.S. 495, 517 (2000).
[19] *Id.* at 2166.