PROTECT *the* PUBLIC'S TRUST

Submitted via email January 8, 2026

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Office for Civil Rights (OCR)
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U.S. Department of Health and Human Services
Office for Civil Rights
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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 and VII Complaint Against West Allis-West Milwaukee School District, Wisconsin

To Whom it May Concern,

I write to you to alert you of an ongoing effort by the West Allis-West Milwaukee School District (the "District"), to continue their practice of imposing Diversity, Equity, and Inclusion (DEI) in their hiring practices and approach to education. As seen in the District's "Strategic Plan," the school intends to hire on the basis of "diversity."[1] It also intends to keep "equity" as one of its educational focuses.[2]

[1] West Allis-West Milwaukee School District, *Destination West 2025-30 Strategic Plan,* accessed January 3, 2025, 14, https://drive.google.com/file/d/1jlJ-fOZb4RjTdtPTkq_GWkwYFfFXazyO/view?pli=1. ("Strategic Plan").
[2] Ibid. 8.

DEI is inherently discriminatory and runs afoul of Titles VI and VII of the Civil Rights Act. The District's Strategic Plan is quietly attempting to violate civil rights laws. Accordingly, we request that you promptly investigate the 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 concept, 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."[3]

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.

Here, the Strategic Plan makes a handful of references to its intention to impose DEI on its staff and students. In 2027-28, the District's intention is to "deepen our impact by focusing on increasing staff diversity and school climate."[4] "the district will prioritize hiring and retaining a diverse workforce

[3] "DEI in Education," Center for Racial Equity in Education, accessed December 3, 2025, https://www.creed-nc.org/unc-diversity-equity-inclusion.
[4] Strategic Plan 5.

that better reflects our student population."[5] As far as "talent acquisition and employee engagement," the District's intention is to "Increase diversity in the workforce across key demographic categories from 10% in 2025 to 25% in August 2030."[6] "We recruit, retain, and develop a workforce that is culturally competent, inclusive, and committed to equity."[7]

Their educational approach will also incorporate "equity." "Equity begins with us. We acknowledge and address our own biases and commit to eliminating systemic barriers that hinder student success."[8] "We ensure all students have equitable access to programs, leadership opportunities, and meaningful involvement in their education."[9] "We use data to allocate resources equitably…."[10]

III. Analysis

Title VI of the Civil Rights Act of 1964[11] 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."[12] Similarly, with regard to employment, it is illegal to "fail or refuse to hire or discharge any individual, or otherwise discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment because of such individual's race, color, religion, sex, or national origin," or to "limit, segregate, or classify his employees…in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, religion, sex, or national origin."[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

[5] Ibid.
[6] Ibid. 14.
[7] Ibid. 8.
[8] Ibid.
[9] Ibid.
[10] Ibid.
[11] 42 U.S.C. §§ 2000d et seq.
[12] 42 U.S.C. § 2000d.
[13] 42 U.S.C. §2000e-2(a).

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

The District is clearly continuing its practice of imposing DEI on its pupils and staff in some form. The very mention of words like "diversity" and "equity" signal that. The Department of Education should conduct an investigation to determine what exactly their usage of these words translate to.

If it is found that the District is creating initiatives designed to help minority students—but not white students—get ahead, then the District's practices are inherently discriminatory. If criteria to get into advanced classes or certain programs are different for students depending upon their race, the practices are 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.

Likewise, any policy that creates hiring criteria that would seek to add race as an employment criteria or goal is inherently discriminatory. Hiring practices that are

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

not discriminatory are merit based. They do not seek a particular outcome that is racially motivated. Here, by creating a goal of an increase of "diverse" teachers, the implied, and logical, goal is to reduce the number of teachers that are not "diverse." This is discriminatory. Furthermore, assigning a numerical value to the goal for race-based hiring, as the District has done, ("Increase diversity in the workforce across key demographic categories from 10% in 2025 to 25% in August 2030."[20]) represents an even more direct and egregious affront.

We urge the Departments of Education, Health and Human Services, and Justice to investigate the policies of West Allis-West Milwaukee School District in Wisconsin for possible violations of Titles VI and VII of the Civil Rights Act.

Sincerely,

Michael Chamberlain
Director
Protect the Public's Trust

[20] Ibid. 14.