March 3, 2025

VIA EMAIL

Kansas City Office
Office for Civil Rights
U.S. Department of Education
One Petticoat Lane
1010 Walnut Street, 3rd floor, Suite 320
Kansas City, MO 64106
OCR.KansasCity@ed.gov

Re: Civil Rights Complaint Against Kansas State University for Violations of Title VI, Title IX, and Recent Trump Administration Executive Orders

Dear Office for Civil Rights,

Young America's Foundation writes to alert you to significant and ongoing civil rights violations against conservative students at Kansas State University.

Introduction and Basic Principles.

Young America's Foundation is a national, conservative nonprofit dedicated to championing traditional values and free speech on college campuses. Students associate with YAF by becoming members and forming YAF chapters. This association enables students to exercise their civil rights in unique ways on campus by conducting activism such as the "Detransitioners Day of Visibility," a YAF project that warns of the dangers of transgenderism and the phycological consequences of "transitioning."[1] YAF activists also host speakers on current issues, such as Matt Walsh for his "What is a Woman" tour. YAF activism spans topics from the sanctity of human life to YAF's "9/11 Never Forget" project, which honors the lives lost in that horrific terror attack. All of this association and expression is protected by the First Amendment, and all of it draws the ire of the campus left.

YAF activists face significant discrimination on campus, where extremist administrators and faculty use so-called and often self-appointed authority to block conservative speech. YAF

[1] https://yaf.org/detrans/

provides logistical and legal support to vindicate student speech rights, including filing lawsuits when necessary.[2]

YAF applauds the Trump Administration's dedication to championing the rights of all students. For too long, leftist administrators have bullied students who challenge evil ideas such as affirmative action and gender transitions. As the leading conservative student organization in America, YAF and our campus activists are in the best position to assist the administration in its efforts to dismantle racialist and gender ideology and to rid schools of DEI bullies who set out to harm the very students they are supposed to be serving.

Kansas State University.

On behalf of our YAF members at Kansas State University and all truth-seeking students on that campus, YAF requests that you open a formal investigation into Kansas State for its promotion of DEI, racialism, and gender ideology in violation of the First Amendment, civil rights laws, and President Trump's executive orders. As specific bases for investigation, YAF submits the following facts:

Kansas State has renamed its "Diversity, Equity, Inclusion, and Belonging" office to the "Office of Access and Opportunity." The vast majority of the office's language remains the same. Consider, for example, their training on "microaggressions" which teaches students about a "Social Identity Wheel" and encourages them to consider "intersectionality" of racial, sexual, and other "ascribed [or] self-claimed" "identities."[3] Kansas State cannot distance itself from wrongheaded policies and practices through mere wordplay.

Kansas State's commitment to bad ideas is unparalleled. For starters, in their "K-State 2025: A Visionary Plan for Kansas State University" the school "embraces diversity."[4] The following excerpt shows what the 2025 Plan and "diversity" are all about (emphasis added):

> ***Excellence, diversity, and inclusion are synonymous in that excellence cannot logically emerge from a warped, discriminatory context nor, in the 21st century,***

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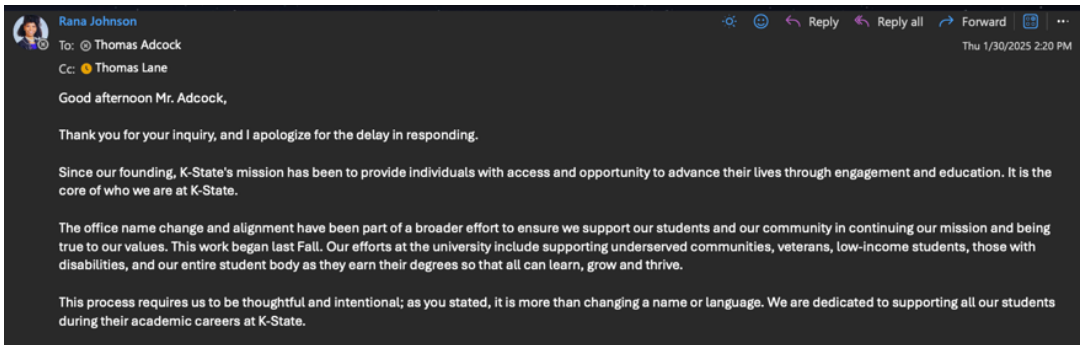
[2] See, e.g., *YAF v. University of Utah* (YAF sent a demand letter when University police shut down the YAF Chapter's screening of "Damaged," a documentary about the dangers of transgenderism, to please leftist hecklers who had taken over the chapter's reserved screening room, shouting down the film); *YAF v. University of California, Los Angeles*, Cen. Cal. Dist. Ct., No. 2:24-cv-08507 (complaint filed Oct. 3, 2024) (UCLA administrators blocked the YAF chapter from hosting a peaceful pro-Israel event, supposedly "security" reasons but provided significant security to protect violent anti-Israel encampments); and *Johnson v. University of Colorado, Boulder*, Col. Dist. Ct., No. 1:25-cv-00390 (complaint filed Feb. 5, 2025) (A leftist professor conspired with the DEI office to punish a student for stating opinions on "pride month" with which they disagreed).

[3] https://www.k-state.edu/access-opportunity/resources/trainings-policies-guidelines/documents/Microaggression-Introduction.pdf

[4] https://www.k-state.edu/2025/plan/2025-visionary-plan.pdf

> ***will excellence ever be recognized in the absence of diversity and inclusion. Diversity is a "common element" in K-State 2025****, alongside international, sustainability, culture, and other similarly key commitments because we all want each to permeate our vision for a nationally leading public research university. A student success culture* ***recognizes that diverse student identities****, communities and cultures—whether they reference race/ethnicity,* ***gender, sexual orientation****, disability, veteran status, or any such category of inclusion/exclusion, any such marker of stratification and inequality—influence, and sometimes very significantly influence, various students' ability to learn, participate, contribute, lead and serve in their university community and beyond. All student success initiatives and programs should therefore recognize and value diversity as well as practice inclusive leadership, while a subset of such initiatives and programs will focus their efforts to strengthen engaged learning around prominent underrepresented identities, communities, and cultures. While all students no doubt benefit from a diverse and inclusive university culture, it is more to the point to underscore that a university cannot meaningfully promote higher learning nor prepare students for their professional, community, social and personal lives by any other means.*[5]

Kansas State claims this rebrand is in line with the school's "founding" mission to "provide individuals with access and opportunity to advance their lives" in line with the value of "supporting underserved communities."



Rana Johnson

Reply | Reply all | Forward

To: Thomas Adcock

Cc: Thomas Lane

Thu 1/30/2025 2:20 PM

Good afternoon Mr. Adcock,

Thank you for your inquiry, and I apologize for the delay in responding.

Since our founding, K-State's mission has been to provide individuals with access and opportunity to advance their lives through engagement and education. It is the core of who we are at K-State.

The office name change and alignment have been part of a broader effort to ensure we support our students and our community in continuing our mission and being true to our values. This work began last Fall. Our efforts at the university include supporting underserved communities, veterans, low-income students, those with disabilities, and our entire student body as they earn their degrees so that all can learn, grow and thrive.

This process requires us to be thoughtful and intentional; as you stated, it is more than changing a name or language. We are dedicated to supporting all our students during their academic careers at K-State.

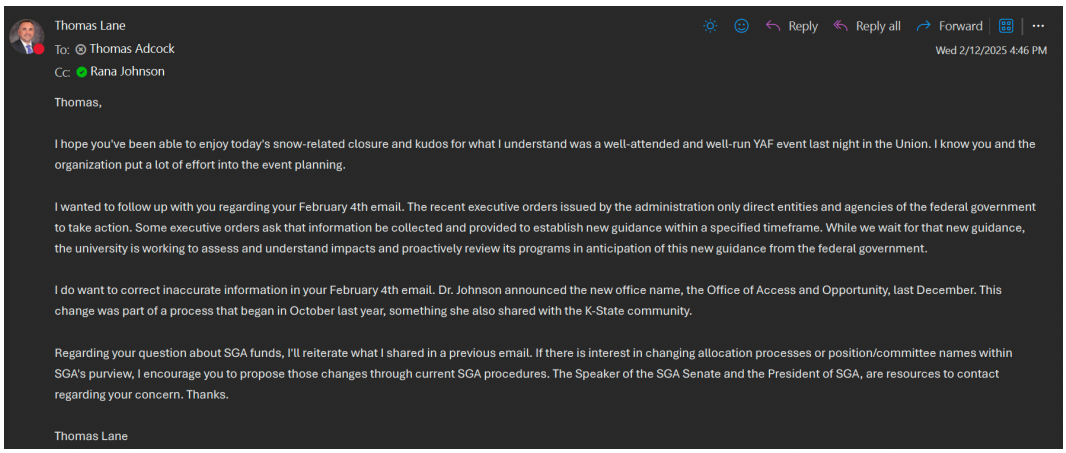
In other words, business as usual.

[5] https://www.k-state.edu/2025/documents/student-life-implementation-plan.pdf

Kansas State has retained seemingly all of its DEI personnel but has simply reworked a few titles. For example, Rana Johnson, PhD[6] went from "Vice President for Diversity, Equity, Inclusion, and Belonging" to "Vice President for Access and Opportunity."

If career DEI sycophants are permitted to continue in positions of authority, they will assuredly continue to promote harmful ideology at the expense of student freedom.

Further, Kansas State has authoritatively disclaimed any obligation to ensure the Student Governing Association (SGA) ceases discrimination and promotion of DEI, racialism, and gender ideology:



Thomas Lane
To: Thomas Adcock
Cc: Rana Johnson
Reply | Reply all | Forward
Wed 2/12/2025 4:46 PM

Thomas,

I hope you've been able to enjoy today's snow-related closure and kudos for what I understand was a well-attended and well-run YAF event last night in the Union. I know you and the organization put a lot of effort into the event planning.

I wanted to follow up with you regarding your February 4th email. The recent executive orders issued by the administration only direct entities and agencies of the federal government to take action. Some executive orders ask that information be collected and provided to establish new guidance within a specified timeframe. While we wait for that new guidance, the university is working to assess and understand impacts and proactively review its programs in anticipation of this new guidance from the federal government.

I do want to correct inaccurate information in your February 4th email. Dr. Johnson announced the new office name, the Office of Access and Opportunity, last December. This change was part of a process that began in October last year, something she also shared with the K-State community.

Regarding your question about SGA funds, I'll reiterate what I shared in a previous email. If there is interest in changing allocation processes or position/committee names within SGA's purview, I encourage you to propose those changes through current SGA procedures. The Speaker of the SGA Senate and the President of SGA, are resources to contact regarding your concern. Thanks.

Thomas Lane

[6] In a February 21, 2025 letter, Kansas State President Linton publicly thanked Dr. Johnson for "making K-State a more welcoming, inclusive community for all" in her leadership of the DEI department while lamenting Ms. Johnson's resignation for "family" reasons. https://www.k-state.edu/today/students/announcement/?id=102178 The school, according to that letter, plans to continue its "access and opportunity" efforts but has not yet named Dr. Johnson's replacement. Dr. Johnson's departure, therefore, is not based upon any school- or department-wide shift away from DEI.

Kansas State claims the SGA is "independent" of the school, but that is false, for the following reasons (nonexhaustive).

1. Kansas State has permitted the SGA to use a ".edu" address and to use the school logo and colors.[7]
2. Kansas State has given the SGA a permanent physical office in the school's Student Union building.[8]
3. Kansas State has given the SGA the authority to control important student benefits including the authority to "Allocate $14 million+ to students every year."[9] Funds come from "[t]he K-State campus-wide mandatory student fee, now named the Student Services fee (but previously known as the Campus Privilege fee)[and] is set by the Board of Regents from the recommendation made by the Student Governing Association and the University Administration."[10]

The SGA is part of the university. Kansas State cannot imbue broad swaths of authority on the SGA and permit them to decide which student groups get the benefit of their own student fees yet claim seriously that it lacks responsibility to ensure the SGA complies with civil rights laws. Further, the assertion that the two entities are distinct is a bad faith fiction. To state a hypothetical, if the SGA told a student "You may not run for student government because you are black," Kansas State would undoubtedly step in to rectify the situation, and rightly so. Kansas State only declaims authority here because it wants the student government to continue to promote unlawful ideas.

With that established, Kansas State has failed to monitor civil rights compliance regarding the SGA. Consider, for example, the SGA's "Diversity, Equity, Inclusion, and Belonging Committee." This committee "receives and reviews the funding requests for on-campus projects with educational value that are intended to provide cross-cultural learning experiences or education on the topics of diversity, inclusion, or discrimination based on race, ethnicity, religion, gender, disability, sexual orientation, socioeconomic status, geographic location, or age."[11]

Benefits such as club funding implicate First Amendment and other civil rights because they impact which student organizations are able to effectively host events on campus. Kansas State cannot outsource its duty to protect these fundamental rights.

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[7] https://www.k-state.edu/sga/
[8] https://www.k-state.edu/sga/
[9] https://www.k-state.edu/sga/
[10] https://www.k-state.edu/sga/funding/student_services_fee/
[11] https://www.k-state.edu/sga/funding/dpf.html

Request for Investigation and Enforcement.

Kansas State has stated the position that the Trump Administration's polices do not affect their programs or actions.[12] This is no surprise, considering Kansas State's idea of "civil rights" equates respect for civil rights with "equity" and "diversity."

K-State Research and Extension

Employee Resources | Local Unit Operations | Employment & Growth | Programming & Reporting | Admin Directory

K-State home » Research and Extension » About » Employee Resources » Programming and Reporting » Civil Rights, Diversity and Access

- Program development committees
- Program focus teams
- Program development
- Program evaluation
- Reporting impact
- Branding and marketing
- Civil rights, diversity and access
  - Civil rights compliance
  - Diversity resources
  - Language and disability access

Civil Rights, Diversity and Access

As system that receives funds from USDA through the National Institute of Food and Agriculture (NIFA), **K-State Research and Extension is committed to fair and equitable treatment of all employees and program participants**. In fact, as the nation's oldest Land-Grant institution, K-State has been putting service and compassion into action since 1863. The university was only the second public institution of higher learning in the U.S. to admit women and men equally. Throughout history, the university has remained committed to creating a level playing field where all can succeed and overcome challenges.

K-State Research and Extension also believes in the principles of diversity, equity and inclusion because we know that human differences enrich our lives, work and communities. **We embrace our responsibility to be a resource for all, regardless of their cultural, ethnic or economic background.**

While there are clear distinctions between compliance concepts and diversity concepts, the two are intertwined. Our actions as Extension professionals should reflect our organizational beliefs.

Key elements of civil rights compliance

Statement from the KSRE Diversity, Equity and Inclusion Task Force

Civil Rights Compliance | Diversity Resources | Language and Disability Access

Additionally, Kansas State's "Office of Civil Rights and Title IX" purports to protect "sexual orientation" and "gender identity,"[13] in defiance of the Trump Administration's position and a federal court order.[14]

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[12] Feb 12, 2025 email from Thomas Lane

[13] https://www.k-state.edu/civil-rights/

[14] In *Kansas v. Dept. of Educ.*, Kan. Dist. Ct., No. 5:24-cv-04041, Young America's Foundation obtained the first nation-spanning injunction against the Biden-Harris administration's wrongheaded rewrite of Title IX. That injunction enjoined Kansas State from "taking any action to enforce the Final Rule promulgated by the Department of Education titled 'Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance.'" (Preliminary injunction entered Jul 2, 2024)

In reality, President Trump has armed and directed the Office of Civil Rights to investigate and defund schools that violate civil rights laws.

Trump Administration Directives

1. **Executive Order No. 14151.**
   President Trump has determined to **End Radical and Wasteful Government DEI Programs and Preferencing**. To accomplish this goal, President Trump has empowered ED to "terminate….all DEI…offices and positions" as well as "all 'equity action plans,' 'equity' actions, initiatives, or programs, 'equity-related' grants of contracts."

   Kansas State accepts federal funds. These funds enable Kansas State to violate civil rights through their "sexual orientation"-based club funding,[15] "Diversity, Equity, Inclusion, and Belonging" office,[16] and racist McNair Scholar's Program,[17] among other programs, in violation of this directive.

2. **Executive Order No. 14173.**
   President Trump has determined to **End Illegal Discrimination and Restore Merit-Based Opportunity**. The Trump Administration has acknowledged that American "institutions of higher education have adopted and actively used dangerous, demeaning,

[15] The left's gender ideology policies necessarily discriminate against students who believe in traditional sexual ethics and biological fact by creating opportunities that are not available to these traditional students and by demeaning them as somehow "privileged." Gender ideology creates a hierarchy wherein the less traditional, and often the more deviant, your sexual beliefs, the higher you sit on the totem pole. For example, consider Kansas State's "Spectrum Center." (https://www.k-state.edu/lgbt/) In its own words, the Spectrum Center "affirms our deeply held commitment for making our campus a place where **ALL** students, faculty, and staff can truly be seen and valued in their entirety as lesbian, bisexual, gay, asexual, queer, and more, as well as individuals who are transgender, non-binary, genderqueer, gender non-conforming, or intersex," (emphasis in original) (https://www.k-state.edu/lgbt/resources/lgb-community.html) and also welcomes "allies." (https://www.k-state.edu/lgbt/resources/) It excludes, however, traditional, heterosexual students. This violates Title IX because sex-based distinctions are permitted in schools but only if they meet certain criteria. Sexual orientation-based distinctions are not permitted under law and are not valid under any criteria.

[16] DEI programs violate Title VI and/or Title IX by wrongfully promoting identity-based requirements and programs, sometimes based on sex, sometimes on race, and sometimes some other category. For example, Kansas State's 2025 Plan pushes a "A student success culture [that] recognizes that diverse student identities, communities and cultures—whether they reference race/ethnicity[or] gender, sexual orientation." Kansas State can only achieve its goal of prioritizing students of certain ethnicities by ignoring or disadvantaging another student who is fully deserving based on merit but fails the DEI metric.

[17] The McNair Scholar's Program is a "$60 million program provides financial and educational opportunities to students nationwide who want to pursue graduate studies. But many college students are ineligible because of their race, including Asians, whites, Arabs, Jews, and some Latinos." (Dan Lennington, Wisconsin Institute for Law and Liberty https://will-law.org/will-sues-biden-harris-over-race-based-educational-program/) This program violates Title VI. Young America's Foundation has filed a lawsuit against the Department of Education on this basis and urges Department to reform the Program now.

and immoral race- and sex-based preferences under the guise of so-called 'diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) that can violate the civil rights laws of this Nation." The administration has further acknowledged that "Illegal DEI and DEIA policies not only violate the text and spirit of our longstanding Federal civil-rights laws, they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement in favor of an unlawful, corrosive, and pernicious identity-based spoils system. Hardworking Americans who deserve a shot at the American Dream should not be stigmatized, demeaned, or shut out of opportunities because of their race or sex." The Trump Administration furthered ordered the Attorney General to "[t]erminate all…'equitable deployment of financial…assistance.'"

Kansas State's DEI-, gender-, and race-based programs violate a basic premise of the college experience: that hard work and equal treatment, not identity-based opportunity or divisive programs, define student success. Kansas State's programs therefore violate this directive.

3. **Executive Order No. 14168.**
President Trump has determined to **Defend Women from Gender Ideology Extremism and Restore Biological Truth to the Federal Government**. The Trump Administration has ordered that "Federal funds shall not be used to promote gender ideology. [ED] shall assess grant conditions and grantee preferences and ensure grant funds do not promote gender ideology."

Kansas State uses outlandish, Orwellian terms such as "gender identity." Further, because of the free speech concerns implicated by gender ideology, ED should prioritize investigation into and sanctions for this matter.

Just this month, the Kansas State YAF chapter was exercising their civil rights by chalking on campus. As a routine matter, campus leftists would vandalize the chalk by pouring water on it. Vice President and Dean of Students Thomas Lane acknowledged that this violated the student code of conduct but refused to do anything about it. Dean Lane suggested that students may not know that erasing someone else's message did not constitute free speech yet claimed he was "unable" to remind students that such actions violated the YAF chapter's First Amendment rights, not to mention school rules.[18] At least once, the YAF chapter informed Dean Lane in advance that they would be chalking and asked that school security assist them in any way, given the near certainty that the vandals would return. He refused. Sure enough, the next morning, the YAF chapter found their chalk had been watered down and made unreadable.

[18] https://www.k-state.edu/policies/ppm/8500/8570.html#.060

The school did nothing to protect conservative speech.

The Trump Administration has specifically acknowledged the campus left's barrage on free speech on gender issues by ordering the Attorney General to "ensure the freedom to express the binary nature of sex and the right to single-sex spaces in…federally funded entities covered by the Civil Rights Act of 1964," and has ordered ED to prioritize investigations and litigation to enforce the rights and freedoms identified."

Kansas State boasts its commitment to "diversity," and its many diversity-centered program violate this directive.

4. **<u>Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.</u>**
ED has stated that "[a]ll students are entitled to a school environment free from discrimination." ED therefore has advised schools to "ensure that their polices and actions comply with existing civil rights law" and "cease all efforts to circumvent prohibitions on the use of race by relying on proxies or other indirect means to

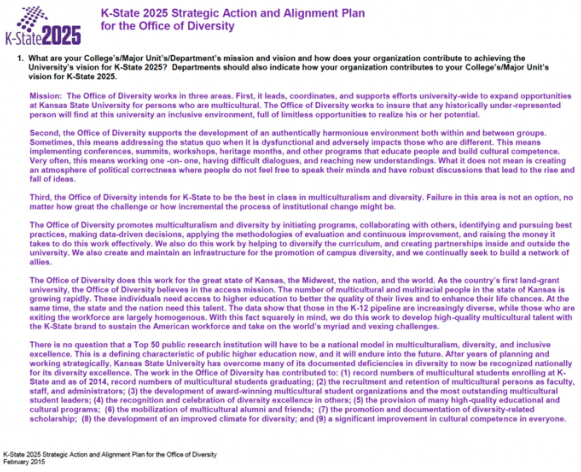
accomplish such ends." ED has stated that DEI programs violate these directives because they "frequently preference certain racial groups and teach students that certain racial groups bear unique moral burdens that others do not. Such programs stigmatize students who belong to particular racial groups based on crude racial stereotypes. Consequently, they deny students the ability to participate fully in the life of a school."

Kansas State has proven its dedication to DEI and division through the years. Their K-State 2025 plan shows their commitment to "diversity" has no bounds, and their disclaiming of any obligation to follow the Trump administration's directives shows they do not plan to right the ship at any point.

<u>Allegations against Kansas State.</u>

1. Kansas State has renamed its DEI office in attempt to circumvent federal law. The DEI office continues to divide people by impermissible methods such as race and sexual "identities," as evidenced in part by their "social identity wheel." The existence and practices of this DEI office violate Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

2. Kansas State has enacted and continues to follow its "K-State 2025" plan, which pledges to undo a "warped, discriminatory context" through "diversity"-based policies and practices, emphasizing "race/ethnicity, gender, sexual orientation."



K-State 2025 Strategic Action and Alignment Plan for the Office of Diversity

1. What are your College's/Major Unit's/Department's mission and vision and how does your organization contribute to achieving the University's vision for K-State 2025? Departments should also indicate how your organization contributes to your College's/Major Unit's vision for K-State 2025.

Mission: The Office of Diversity works in three areas. First, it leads, coordinates, and supports efforts university-wide to expand opportunities at Kansas State University for persons who are multicultural. The Office of Diversity works to insure that any historically under-represented person will find at this university an inclusive environment, full of limitless opportunities to realize his or her potential.

Second, the Office of Diversity supports the development of an authentically harmonious environment both within and between groups. Sometimes, this means addressing the status quo when it is dysfunctional and adversely impacts those who are different. This means implementing conferences, summits, workshops, heritage months, and other programs that educate people and build cultural competence. Very often, this means working one -on- one, having difficult dialogues, and reaching new understandings. What it does not mean is creating an atmosphere of political correctness where people do not feel free to speak their minds and have robust discussions that lead to the rise and fall of ideas.

Third, the Office of Diversity intends for K-State to be the best in class in multiculturalism and diversity. Failure in this area is not an option, no matter how great the challenge or how incremental the process of institutional change might be.

The Office of Diversity promotes multiculturalism and diversity by initiating programs, collaborating with others, identifying and pursuing best practices, making data-driven decisions, applying the methodologies of evaluation and continuous improvement, and raising the money it takes to do this work effectively. We also do this work by helping to diversify the curriculum, and creating partnerships inside and outside the university. We also create and maintain an infrastructure for the promotion of campus diversity, and we continually seek to build a network of allies.

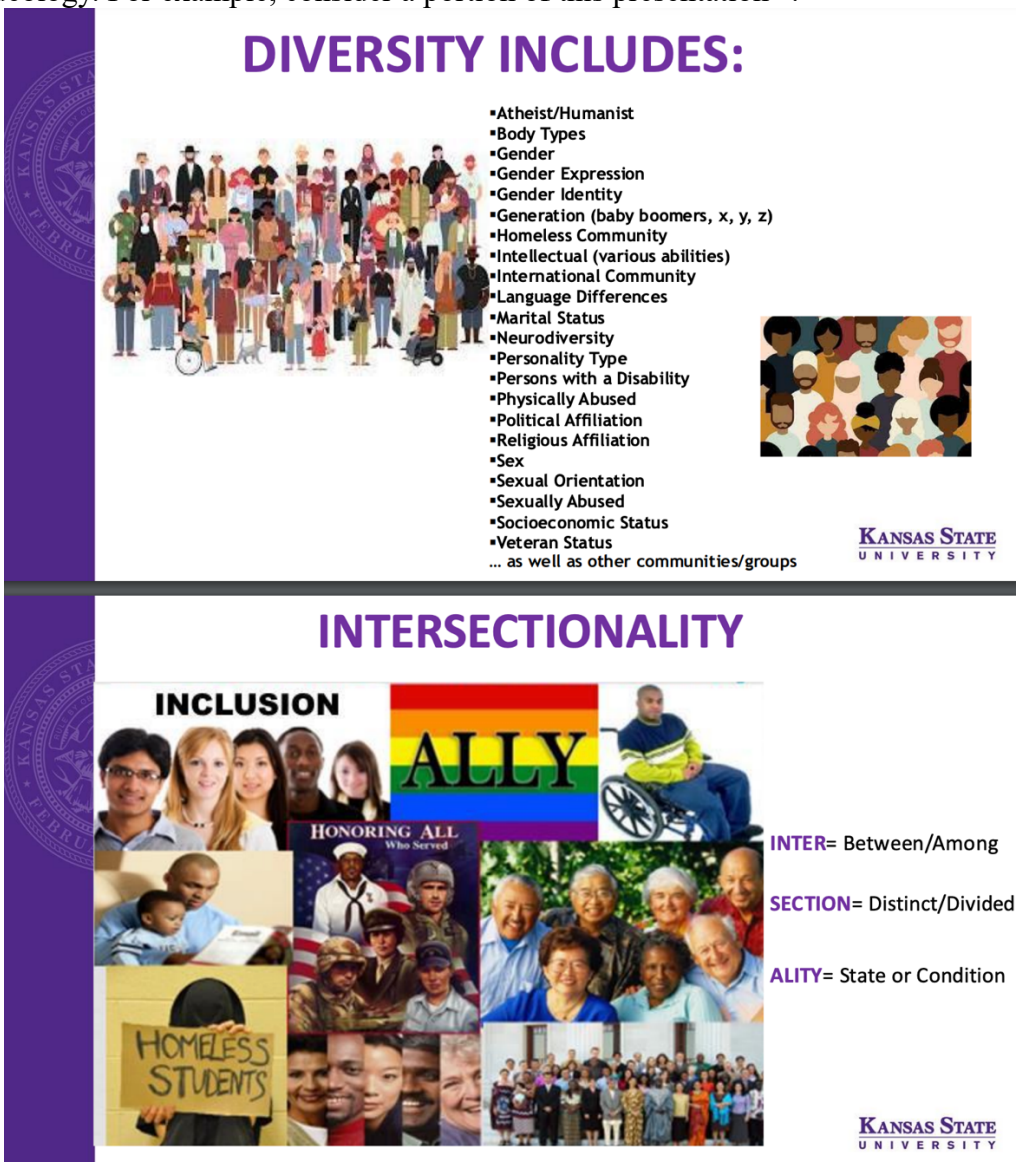
The Office of Diversity does this work for the great state of Kansas, the Midwest, the nation, and the world. As the country's first land-grant university, the Office of Diversity believes in the access mission. The number of multicultural and multiracial people in the state of Kansas is growing rapidly. These individuals need access to higher education to better the quality of their lives and to enhance their life chances. At the same time, the state and the nation need this talent. The data show that those in the K-12 pipeline are increasingly diverse, while those who are exiting the workforce are largely homogenous. With this fact squarely in mind, we do this work to develop high-quality multicultural talent with the K-State brand to sustain the American workforce and take on the world's myriad and vexing challenges.

There is no question that a Top 50 public research institution will have to be a national model in multiculturalism, diversity, and inclusive excellence. This is a defining characteristic of public higher education now, and it will endure into the future. After years of planning and working strategically, Kansas State University has overcome many of its documented deficiencies in diversity to now be recognized nationally for its diversity excellence. The work in the Office of Diversity has contributed to: (1) record numbers of multicultural students enrolling at K-State and as of 2014, record numbers of multicultural students graduating; (2) the recruitment and retention of multicultural persons as faculty, staff, and administrators; (3) the development of award-winning multicultural student organizations and the most outstanding multicultural student leaders; (4) the recognition and celebration of diversity excellence in others; (5) the provision of many high-quality educational and cultural programs; (6) the mobilization of multicultural alumni and friends; (7) the promotion and documentation of diversity-related scholarship; (8) the development of an improved climate for diversity; and (9) a significant improvement in cultural competence in everyone.

K-State 2025 Strategic Action and Alignment Plan for the Office of Diversity
February 2015

K-State 2025 violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

3. Kansas State's "Next Gen K-State Strategic Plan" pushes DEI, racialism, and gender ideology. For example, consider a portion of this presentation[19]:



As part of this plan's mission, the "university embraces diversity."

[19] https://www.k-state.edu/access-opportunity/resources/trainings-policies-guidelines/documents/Physician-Assistants-Advocacy-Diversity-Equity-Inclusion-Belonging.pdf

YOUNG AMERICA'S FOUNDATION

STRATEGIC PLAN 2030

MISSION

The mission of Kansas State University is to foster excellent teaching, research and service that develop a highly skilled and educated citizenry necessary to advancing the well-being of Kansas, the nation and the international community. The university embraces diversity, encourages engagement and is committed to the discovery of knowledge, the education of undergraduate and graduate students and improvement in the quality of life and standard of living of those we serve.

This Next Gen plan also pledges to promote "belonging,"[20] which Kansas State defines as:

BELONGING is the feeling individuals, particularly those from historically underrepresented groups who have experienced exclusion in the past, have in places that have intentionally actionized diversity, equity, and inclusion to create a culture that supports the feeling of security, acceptance, and value.

ASSOCIATION OF PUBLIC & LAND-GRANT UNIVERSITIES

KANSAS STATE UNIVERSITY

Theme 3 ("Teaching, Learning and Research") of this plan promises to "Create opportunities and outcomes for learning in diversity, equity, inclusion and belonging that permeate throughout the curriculum, from within majors to general education, as well as in co- and extra-curricular activities."[21] Theme 3 commits to the following action items:

Action Items

- 3a.1 Adopt the U.S. Multicultural Overlay as a universitywide model (Action Plan Step 10: For a More Inclusive K-State).
- 3a.2 Assure that all bachelor's degree programs have clear and measurable student learning outcomes in diversity, equity, inclusion and belonging.
- 3a.3 Assure that assessment of all K-State 8 tagged courses in Human Diversity in the U.S. accomplishes the intended learning outcomes.
- 3a.4 Require all students to complete at least one course in diversity, equity, inclusion and belonging that outlines the brief history of historically underrepresented and underserved populations in the United States.
- 3a.5 Establish student learning outcomes in diversity, equity and inclusion as part of cocurricular and extra-curricular activities.

[20] https://www.k-state.edu/next-gen/documents/plan-summary/Next-Gen-K-State_SummaryStrategicPlan_2023.pdf
[21] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/themes/teaching-learning-research/

Theme 4 ("Workforce Diversity and Inclusion") promises to "Achieve representation parity in hiring and promotion of underrepresented populations across the university at all levels, including senior leadership roles."[22] This theme's many troubling action items include the following, which expressly use race as a key factor in partnerships and hiring, and even commit to "showcasing" "diverse" people, as if human beings were tokens:

- 4b.7 When opportunities present themselves, create partnerships in each college in the name of prominent diverse K-State alumni.
- 4b.8 Develop a pipeline initiative to identify and move talented, diverse prospects from K-State graduate and undergraduate programs into K-State careers.
- 4b.9 Sustain a comprehensive dashboard created to display current applicants and hire demographic information for all faculty and staff hiring at K-State (Action Plan Step 9: For a More Inclusive K-State).
- 4b.10 Increase participation and attendance at national recruitment conferences for diverse and underrepresented prospective employees.

Theme 5 of this plan ("Climate and Intergroup Relations") promises to "Educate all university constituents to enhance the community, climate and centrality of diversity, equity, inclusion and belonging."[23] In real terms, indoctrination to racialist and gender confusing ideologies. Theme 5's action items include:

> 5b.4 Require diversity and inclusion training for administrators, supervisors and student leadership groups (e.g., resident assistants, ambassadors, Greek letter organizations, tour guides and orientation leaders) and incoming employees.

Theme 6 of this plan ("Inclusive Excellence") lauds the supposed "legitimate contributions of diversity and inclusion efforts to the educational mission of the university in all spheres: teaching, research, service, cocurricular, recruitment of students, faculty and staff, and engagement with the publics we serve," and promises to "bring these efforts to the forefront of the university to aid in the accomplishment of our legitimate diversity and inclusion aims and our educational mission."[24] Theme 6's action items include:

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[22] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/themes/workforce-diversity-inclusion/
[23] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/themes/climate-intergroup-relations/
[24] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/themes/inclusive-excellence/

Action Items

- 6.1 Identify best practices in recruiting and retaining diverse populations and historically excluded individuals by category (faculty, staff, students), and establish recruitment practices that intentionally build more diverse hiring committees.
- 6.2 Identify best practices in funding according to the K-State 2025 Strategic Action Plan.
- 6.3 Create and implement implicit bias and equitable access training for faculty, staff and students. Ensure 95% of faculty and staff have completed required university diversity training.
- 6.4 Integrate diversity and multicultural content and pedagogies in all colleges and curriculum, based on Tilford Multicultural Competences evaluation.
- 6.5 Identify data-informed working practices in areas of student success and support services for students from historically underrepresented and underserved populations.
- 6.6 Use data and findings from K-State Climate Survey and focus groups and yearly Office of Institutional Equity reports to find areas of growth and create interventions.
- 6.7 Celebrate and showcase best practices around recruitment, retention and graduation.
- 6.8 Develop improved perceptions of K-State to internal/external constituents, through programming and events.
- 6.9 Create transparent reporting to internal and external constituents for diversity, equity, inclusion and belonging-related work, including celebration and awards, as well as current interventions and room for growth.
- 6.10 Collaborate with community, state and national organizations to create and be recognized for having a model universitywide strategic planning and reporting process for diversity.

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

4. Kansas State's College of Agriculture promotes DEI. In their own words, "Diversity, equity and inclusion is everyone's job – our Diversity Programs Office guides the K-State College of Agriculture and K-State Research and Extension as we carry out our mission and seek to re-shape the world in a way in which all people enjoy the same opportunities, are treated with dignity, feel safe and are able to realize their dreams."[25]

   This college is attempting to obscure their DEI mission by changing the name of their diversity office. Contrast the following tow pictures:

[25] https://www.ag.k-state.edu/student-success/diversity-programs/

College of Agriculture

About | Academics | Student Success | Research & Extension | Alumni | Ag Experiences

K-State home » Student Success » Diversity Programs Office

- Student Features
- Scholarships & Financial Aid
- Academic Resources & Support
- Career Development
- Diversity, Equity & Inclusion

Diversity Programs Office

K-State College of Agriculture is committed to respecting and celebrating all. Our race, gender, orientation, culture and background shape our perspectives, life experiences and personal identity. Diversity, equity and inclusion is everyone's job – our Diversity Programs Office guides the K-State College of Agriculture and K-State Research and Extension as we carry out our mission and seek to re-shape the world in a way in which all people enjoy the same opportunities, are treated with dignity, feel safe and are able to realize their dreams.

College of Agriculture

About | Academics | Student Success | Research & Extension | Alumni | Ag Experiences

K-State home » Student Success » Agricultural Student Success Office

- Student Features
- Scholarships & Financial Aid
- Academic Resources & Support
- Career Development
- Agricultural Student Success Office

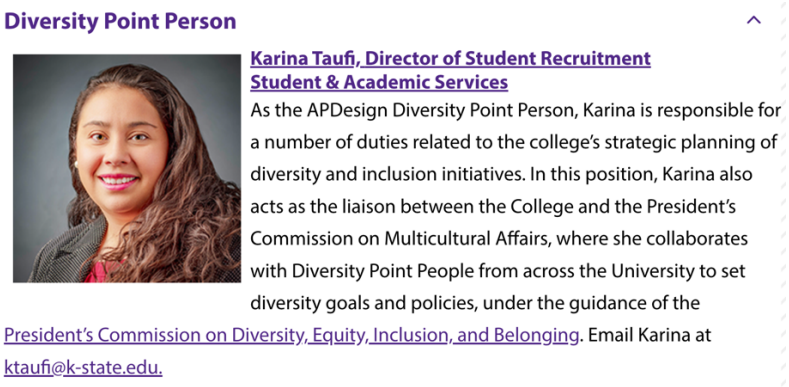
K-State College of Agriculture is committed to its students and their success in our programs and beyond. Our life experiences shape our perspectives, and we want the experiences in the College of Agriculture to be an integral part of who our students are and who they become when they leave us for the next stage of their journey. Our Agricultural Student Success Office guides the K-State College of Agriculture and K-State Research and Extension as we carry out our mission and seek to re-shape the world in a way in which we all enjoy the same opportunities, are treated with dignity, feel safe and are able to realize our dreams.

In a recent video,[26] this college urges students to dismiss the value of the individual and individual choice in favor of "diversity":

[26] https://www.youtube.com/watch?v=QJs-9KM7s14

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

5. Kansas State's College of Architecture, Planning & Design promotes a DEI initiative.[27] It offers education on "Foundations for Diversity Dialogue" and "Unconscious Bias & Identity." This college has a "diversity point person."



This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

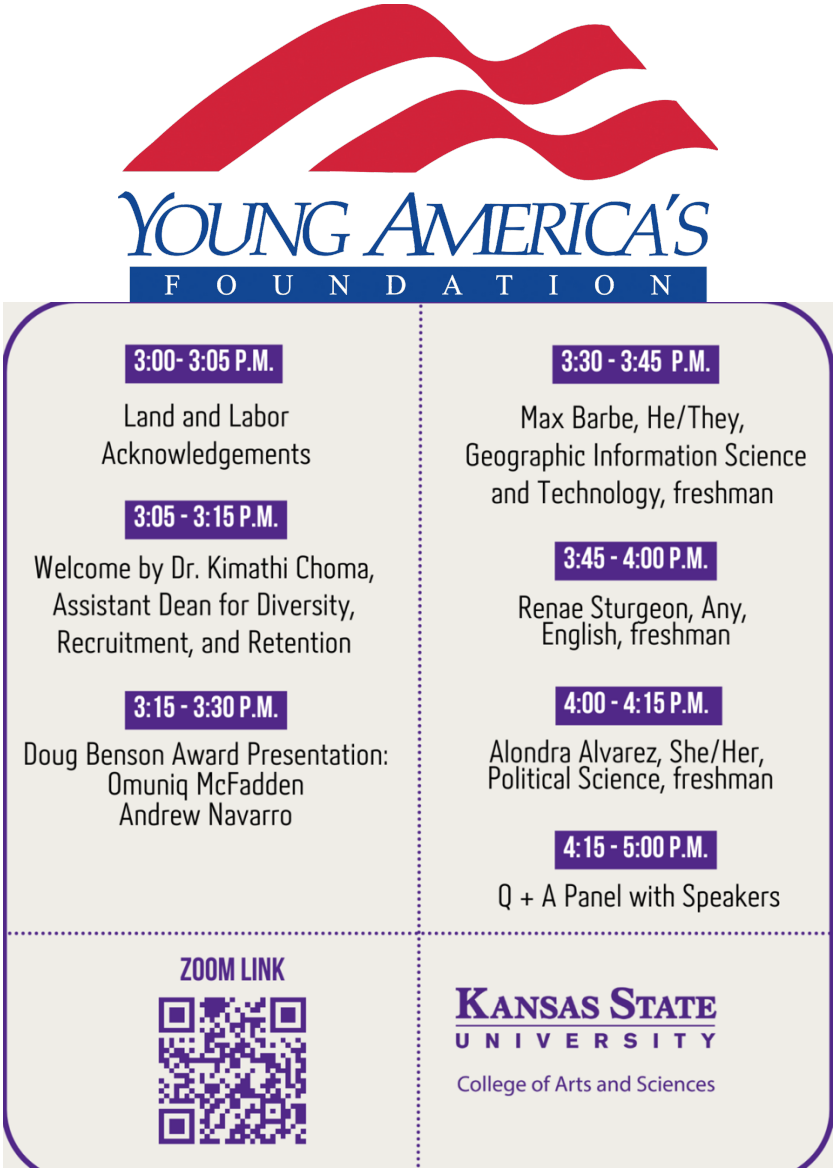
[27] https://apdesign.k-state.edu/student-success/diversity-inclusion/

6. Kansas State's College of Arts and Sciences promotes a DEI initiative.[28] This college's programming includes "funding to host prominent speakers, presenters, or performers whose presentations address issues of diversity or multiculturalism" and at least two DEI-based scholarships:

> **Professor Douglas K. Benson Award**
>
> The Professor Douglas K. Benson Award is a $500-$1,000 scholarship for full-time College of Arts and Sciences students who have at least a 2.0 GPA and have made contributions to diversity, equity, inclusion and belonging (DEIB) on campus. Applicants must submit a resume, a form of expression (essay, picture, poem, drawing, dance, music, etc.) representing DEIB, and a 150-200 word summary of their appreciation for DEIB in a global world. The deadline is March 15.
>
> **Davids-Dunham Award**
>
> The Davids-Dunham Award recognizes the research, teaching and service of faculty members in the College of Arts and Sciences who identify with underprivileged groups and/or have made significant efforts to promote diversity at K-State. The Award usually conveys $1,000-2,000. It is administered by the College of Arts and Sciences Diversity Committee.
>
> Questions may be directed to cas-diversity@ksu.edu

This college also hosts a Student Diversity Summit, where they will award the discriminatory scholarships and learn about "land and labor acknowledgements" from "he/theys" and "she/hers."[29]

[28] https://artsci.k-state.edu/about/diversity/
[29] https://artsci.k-state.edu/about/diversity/programs/stusummit.html



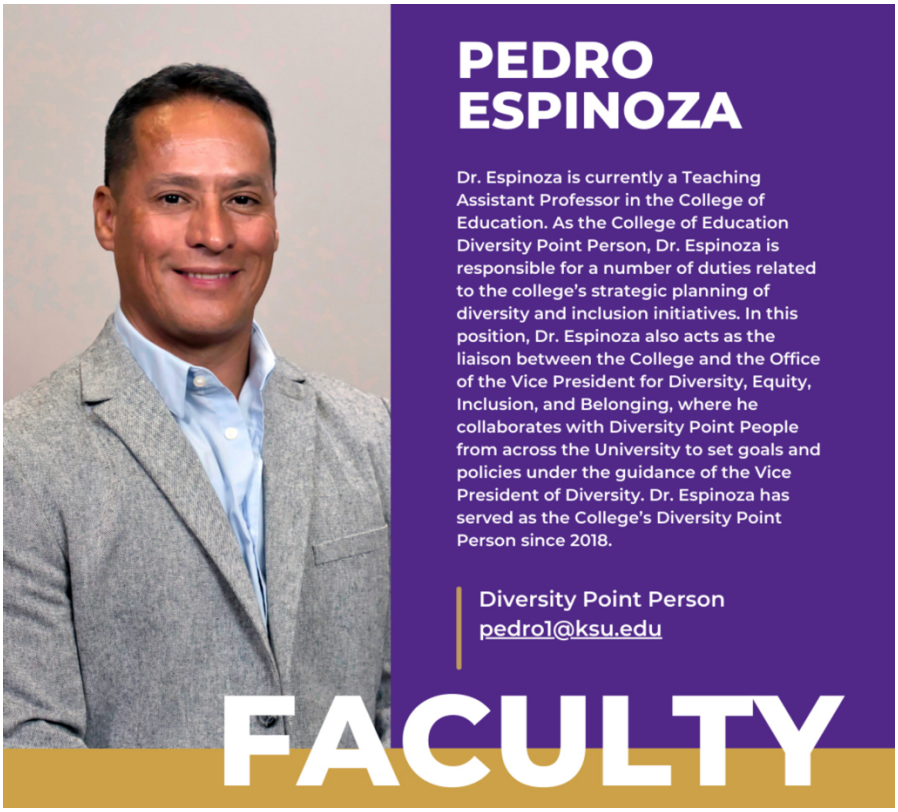
This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

7. Kansas State's College of Education promotes a DEI initiative, citing it as the "core" of their mission:

Engaging in difficult conversations around diversity and inclusion is critically important for our campus community for many reasons:

1. Embracing and supporting diversity and inclusion is a core value of our campus community and it is the right thing to do.
2. Embracing and supporting diversity and inclusion are a vital part of our K-State Principles of Community and who we aspire to be as a community.
3. We know employers value diversity and inclusion and knowledge and skills in navigating difficult issues and it is our duty to foster that knowledge and those skills in our students.

This college also has a diversity point person:



This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

8. Kansas State's Carl R. Ice College of Engineering promotes a DEI initiative.[30] In their own words, "The college invests in programs to recruit and retain demographics historically underrepresented in engineering. In addition, specific programs and student organizations are available to create an environment of belonging for students." The college also promotes a cash prize of $4,000 based on racialist and DEI criteria:

[30] https://engg.k-state.edu/student-success/diversity-inclusion/

The nominee must have demonstrated exceptional character, leadership and service toward the enhancement of diversity in any active form in the College of Engineering at K-State such as —

- Outstanding service and leadership in areas that affect historically under-represented students.
- Outstanding contributions in creating awareness, appreciation and respect for diverse student populations.
- Outstanding efforts in creating and helping to maintain a campus environment that contributes to the well-being of historically under-represented students or to the cultural competence of all students.

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

9. Kansas State's College of Health and Human Sciences promotes a DEI initiative.[31]

Diversity Inclusion and Social Justice

We incorporate and welcome diversity and inclusion in the courses we teach and the content we include in those courses. We respect diverse thinking and different ways of knowing through our **research**. In our **engagement** activities through **extension**, **outreach**, **projects**, and **clinics**, we design and conduct ethically valid programs that matter to those impacted by injustice and implicit bias. As helping professionals, we are on the forefront of seeing systemic racism and being in a place to make a difference in the lives of the students, alumni, families, and communities we serve.

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

10. Kansas State's College of Veterinary Medicine promotes a DEI initiative that has won multiple "Health Professions Higher Education Excellence in Diversity" Awards.[32] This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

[31] https://www.hhs.k-state.edu/ahs/about/diversity-inclusion.html
[32] https://www.k-state.edu/media/newsreleases/2022-10/heed-vet-med-award102722.html

11. Kansas State participates in the McNair Scholars Program, which excludes students who are not of the "right" race.[33] This violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

12. Kansas State authorizes and enables its SGA office to host a "Diversity, Equity, Inclusion, and Belonging Committee" that distributes benefits to students based on "diversity" considering such things as "sexual orientation." In doing so, Kansas State violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

13. Kansas State operates the "Spectrum Center," which is a resource offered only to students who agree with gender ideology and excludes traditional students. The Spectrum Center violates Title IX and Executive Order No. 14168.

14. Kansas State's "Office of Civil Rights and Title IX" protects "sexual orientation" and "gender identity." In doing so, Kansas State violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

15. Kansas State's Committee on Gender Equity at K-State was created to "review the roles, needs, and opportunities of our diverse students, faculty and staff at Kansas State University, promoting gender equity for all."[34] This violates Title IX, Executive Order No. 14151, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

16. Kansas State's University Committee on Diversity, Equity, Inclusion and Belonging was created to "Assist in creating and developing a University Climate of Inclusiveness and Diversity" and "Ensure that committee recommendations remain a high priority in the language and planning efforts of Kansas State University."[35] This Committee encourages students to participate in the "University Climate Survey," which "was designed to help improve the experience and wellbeing of our university community by measuring how diversity and inclusion play a crucial role at the university."

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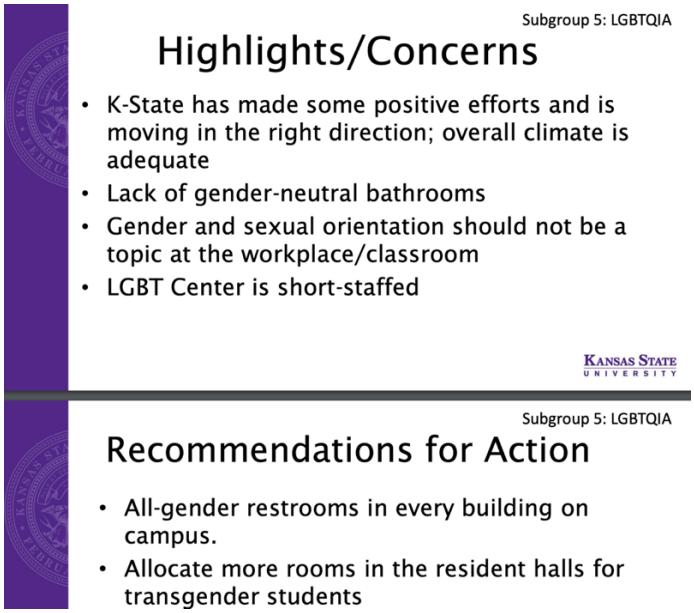
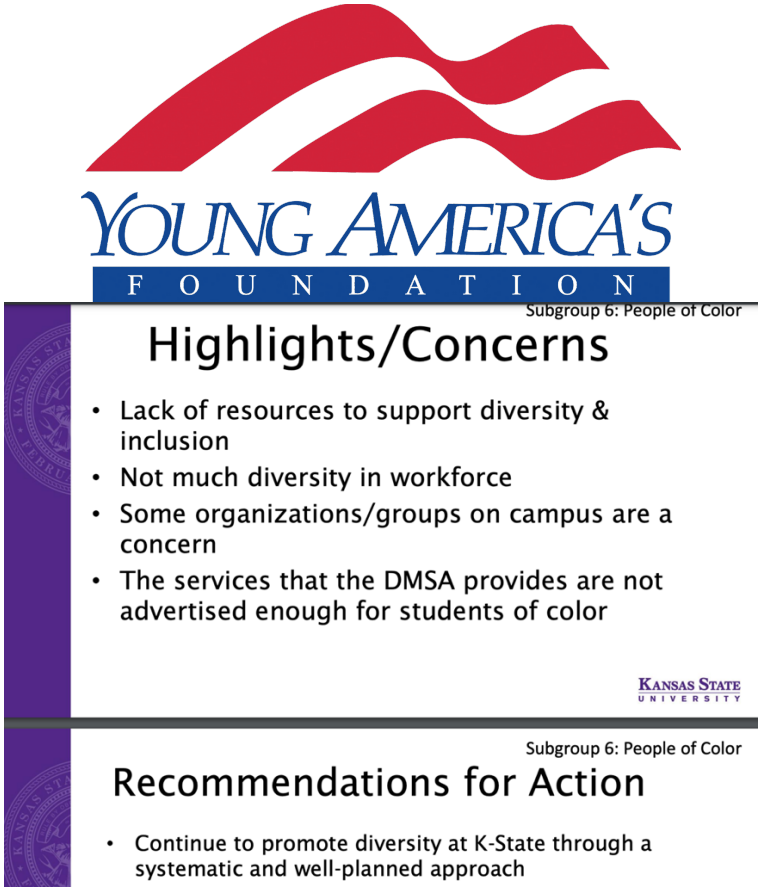
[33] https://www.k-state.edu/2025/documents/dept-integrated-plans/SL_Educational-Supportive-Services-and-McNair-Scholars-Program_Integrated_2025_Plan.pdf
[34] https://www.k-state.edu/gender-equity/
[35] https://www.k-state.edu/access-opportunity/resources/committees/diversity-equity-inclusion-belonging/, https://www.k-state.edu/data/institutional-research/quickfacts/#quickfactsdiversityinclusion

Reporting the results of the Climate Survey, Kansas States identifies a "lack of gender-neutral bathrooms" to be a "concern" and recommends the school "allocate more rooms in the resident halls for transgender students."



In doing so, Kansas State recognizes sex-based distinctions that are not legitimate under law and allocates resources to certain students over others based on that illegitimate distinction.

Going further, Kansas State "subgroups" certain students into a "people of color" category and commits to "promote diversity at K-State through a systematic and well-planned approach."



This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

17. Kansas State's Diversity, Equity, Inclusion and Belonging Strategic Plan[36] is racialist and pushes DEI and gender ideology.
    a. Kansas State has committed to Hiring and Retaining More Faculty and Staff of Color. As part of the "11-Step Action Plan for a More Inclusive K-State," Kansas State has committed to "increase the hiring and retention efforts for faculty and staff of color."[37]
    b. Kansas State recruits students based on race, ethnicity, and sexual "identity."[38] In their own words:

> K-State is a top recruiter of students from historically underrepresented and underserved populations in the state of Kansas. Nationally, K-State is recognized as among the best universities in serving LGBTQ+ students. K-State is also a designated First-gen Forward

[36] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/
[37] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/action-plan/faculty-staff/hiring-retention/
[38] https://www.flipsnack.com/BCA7F5DD75E/our-lens-our-focus-our-k-state-deib-strategic-plan.html

Kansas State has committed to the following actions to reach these wrongful objectives:

ACTION ITEMS

1a.1 Expand outreach to students from historically underrepresented, underserved and international backgrounds to attend K-State and pursue undergraduate, graduate and professional programs.

1a.2 Ensure the implementation of culturally responsive recruitment and outreach initiatives to create a more diverse and mutually inclusive undergraduate and graduate student body (Action Plan Step 3: For a More Inclusive K-State).

1a.3 Employ successful students from historically underrepresented and underserved populations in institutional programs that can assist us with recruiting, retaining and graduating students.

1a.4 Reshape our institutional focus on how we identify and assess talented students at the graduate and undergraduate levels.

1a.5 Utilize feeder relationships to recruit diverse graduate, professional and postdoc students in all colleges and programs.

1a.6 Scale up programs that support recruitment, retention and graduation of students from historically underrepresented, underserved and international backgrounds (Action Plan Step 4: For a More Inclusive K-State).

1a.7 Develop and utilize an intersectional framework for programming and events that addresses the many forms of restorative justice.

All of these plans immorally categorize students based on things such as skin color. Note the last point, which promises "restorative justice" for students who supposedly, in Kansas State's worldview, rank low in the "intersectionality" hierarchy. Preferencing students in this manner is reparations, plain and simple.

c. Kansas State promises to pursue "equity," defining equity and "equity gaps" in explicitly evil terms that define human beings in racialist and other deadnaming ways[39]:

equity	fair and just practices and policies that ensure all campus community members can thrive; being equitable means acknowledging and addressing strucual inequalities - historic and current - that advantage some and disadvatage others
equity gaps	disparities in educational outcomes and student success metrics across race/ethnicity, socioeconomic status, gender, physical or mental abilities, and other demographic traits and intersectionalities

d. Kansas State identifies "deadnaming" as a problem, defining the term in this way:

dead naming	continuing to use the name that a transgender person was given at birth and no longer uses upon transitioning

This both pushes gender ideology and infringes on free speech.

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

18. Kansas State hosts a "Multicultural Student Center," which most students have dubbed as the "Black Student Union." This resource is separate from the main Student Union and is DEI-based.[40] This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

19. Kansas State hosts an Office of Institutional Equity.[41] This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

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[39] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/framework/glossary-of-terms/
[40] https://www.k-state.edu/2025/plan/goals/facilities.html, https://www.k-state.edu/inclusion/multicultural-center/, https://www.k-state.edu/inclusion/multicultural-center/about/
[41] https://www.k-state.edu/today/announcement/?id=90558

20. Kansas State has committed to ethnicity-based pay scaling for employees.[42] In their own words, Kansas State will "Assess and evaluate equitable salaries and pay compensation that considers cultural identities of populations that have been historically underrepresented and underserved (i.e., gender, race, ethnicity)." This violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

21. Kansas State's College of Business pushes DEI. In their own words[43]: "Through advancing institutional equity, practicing inclusion, and creating a culture of belonging, businesses can attract and retain diverse talent as well as harness the benefits of having a diverse workforce. This includes, but is not limited to, increased company and employee performance, improved employee commitment to the organization, reduced turnover, and improved understanding of and engagement with the diverse marketplace. Moreover, inequality and division have significant impact on our communities. Businesses that foster DEIB are one part of the solution in addressing systemic inequalities. This certificate contributes to the meaningful and critical work across campus to advance the Action Plan for a More Inclusive K-State and the Strategic Diversity Plan." This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

22. Kansas State pushes DEI in its athletic programs. In their own words, Kansas State is committed to social justice and racialism:

Who We Are

K-State Athletics continues to identify new activation steps as a way to grow its social justice programming and awareness for all student-athletes, coaches and staff. The department is in its fourth year of its STEP plan, which was created to foster an environment that embraces and celebrates excellence.

"We will not stand for social injustice," said Athletics Director Gene Taylor. "Now is the time for us to build upon the STEP program that we launched two years ago and make bigger strides in the areas of racial injustice and racism. I am so proud of our student-athletes, coaches and staff for working together on these steps."

[42] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/themes/climate-intergroup-relations/
[43] https://cba.k-state.edu/academics/undergraduate/certificates/deib-business/

Kansas State Athletics also boasts recent initiatives[44] including:

a. "PAALS (Positioning African American and Black Student-Athletes for Lifelong Success)
b. Athlete Ally ("dedicated to taking a stand against homophobia and transphobia in sports by bringing a message of respect, inclusion and equality to our athletic community."[45])
c. Student-Athlete Social Justice and Action Committee
d. Created a department-wide Diversity and Inclusion Staff Action Committee
e. Held a Black Lives Matter educational panel with Ahearn Fund donors

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

23. Kansas State's library "prioritize[s] inclusion, diversity, equity, accessibility and social justice initiatives and demonstrate our support in our daily actions."[46] This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

24. Kansas State's division of Multicultural Student Life pledges to "empower" student "identities" "by cultural affirmations." including by "Supporting marginalized and underrepresented students" and "Providing resources and support for multicultural student groups."[47] This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

25. Kansas State's Cultural Competency Workshop demeans "White people" by targeting the "White community" with "The Four A's on Anti-Racism":[48]

[44] https://www.kstatesports.com/sports/2017/8/23/diversity-inclusion
[45] https://www.kstatesports.com/sports/2017/9/28/diversity-inclusion-programs
[46] https://lib.k-state.edu/about/diversity-equity-inclusion-accessibility/
[47] https://www.k-state.edu/inclusion/multicultural-center/student-life/
[48] https://www.k-state.edu/access-opportunity/initiatives/deib-strategic-plan/action-plan/faculty-staff/cultural-competency/lorenza-lockett-letter.html

The suggestions

Awareness: Silent mindfulness that a phenomenon exist.

Take the time to notice what is happening around you without explaining it away to some other cause. We often will find what we are looking for, yet cannot see what we choose to remain blind to. Open your eyes; the world around you is full of multiple, blatant, manifestations of racial disparities toward Black Americans.

Acknowledgment: Public declaration (to the targeted population) of your awareness.

Say what you see. Take personal responsibility and courage to voice your disdain of such to first the African American community (as the opportunity presents itself) and to the general populous; especially to your own kind, White America. This step takes a lot of courage and you may incur some social/emotional cost from family, friends, and neighbors; perhaps even from some Blacks who are not in the mood to appreciate you. Say it.

Analysis: Now go deeper.

Read the inclusive history that goes beyond your learned and lived limited experiences. We live in bubbles; reach beyond your bubble and embrace the reality that exist on the other side; our Black world. Look at the data; the distortional statistical disparities in health, education, employment, life expectancy, etc. It's there. Embrace what you see. Allow yourself to rethink both the historical and present-day ramifications of the unfavorable sustaining world that we (Blacks) live in.

Action: Make it personal. The rest is up to you.

Commit to actions to alleviate or eradicate the impact of racism upon the population on which it is imposed -- in this case, African Americans. There are a host of mediums and actions you do this through: personal and public advocacy; support groups, policy making, political affiliations, grass root movements; public forums, deliberative dialogues; social media; formal education, etc.

Whatever you do, do it for the greater, inclusive good. Do it because people matter; so in this case let Black People Matter. Try it; I think WE will like it!

Dr. Lorenza Lockett
Assistant Professor in Social Work
Department of Sociology, Anthropology, and Social Work

This violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

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Based on the above, YAF urges you to open a formal investigation into Kansas State University and to apply appropriate remedial actions. To the extent that any of this information falls outside the OCR's subject-matter jurisdiction, we request that you refer that portion of the complaint to the Attorney General for further action.

Conclusion.

YAF looks forward to seeing American colleges truly become the "marketplace of ideas," where speech is free in both policy and fact, and the only identity that matters is each student's dignity as a human being. Please contact me if I can provide further assistance or information.

Sincerely,

Madison Hahn
Associate General Counsel
Young America's Foundation
11480 Commerce Park Dr., STE 600
Reston, VA 20191
800.USA.1776
mhahn@yaf.org

CC:
U.S. Department of Education
Office for Civil Rights
ocr@ed.gov