



March 18, 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,

YAF would like to offer further support for Allegation 1 in our March 3 complaint against Kansas State University.

1. Kansas State has issued guidance on its reaction to the Feb 14 Dear Colleague Letter. After acknowledging that “[e]xecutive orders have called for the elimination of federal diversity, equity, inclusion and accessibility (DEIA) programs and trainings,” Kansas State nonetheless recommits to “ensuring our language is compliant but does not stray from its intent of showcasing our mission of education and service for all.” In other words, Kansas State will change in name only. Because Kansas State, as outlined in YAF’s March 3 complaint, has for years promoted DEI, gender ideology, and racialism and retains DEI personnel, the school’s promise to continue promoting these same activities but in disguise 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.

YAF would also like to add two allegations to that complaint. If you will not accept these as an addition, please consider this a new complaint.

26. Kansas State boasts an “Indigenous Faculty and Staff Alliance.” This group’s mission “is to create decolonized spaces at the university and increase the presence, promotion, and support of Indigenous faculty, staff, and students at K-State” because, according to this group, “the land that serves as the foundation for this institution was, and still is, stolen



land.”¹ Kansas State’s clear message here is that all students who are not of indigenous descent are thieves and colonizers, and all students of indigenous descent are victims. Additionally, this leadership opportunity (the extent of their authority is unclear, but their land acknowledgment, detailed below, is displayed prominently on the school’s webpage) and at least some of the resources this group offers are on their terms available exclusively to people of indigenous descent.

Along these same lines, Kansas State uses a land acknowledgment, which states as follows:

Indigenous Land Acknowledgement



Indigenous Faculty Staff Alliance Land Acknowledgement

(January 15, 2020)

As the first land-grant institution established under the 1862 Morrill Act, we acknowledge that the state of Kansas is historically home to many Native nations, including the Kaw, Osage, and Pawnee, among others. Furthermore, Kansas is the current home to four federally recognized Native nations: The Prairie Band Potawatomie, the Kickapoo Tribe of Kansas, the Iowa Tribe of Kansas and Nebraska, and Sac and Fox Nation of Missouri in Kansas and Nebraska.

Many Native nations utilized the western plains of Kansas as their hunting grounds, and others – such as the Delaware – were moved through this region during Indian removal efforts to make way for White settlers. It’s important to acknowledge this, since the land that serves as the foundation for this institution was, and still is, stolen land.

We remember these truths because K-State’s status as a land-grant institution is a story that exists within ongoing settler-colonialism, and rests on the dispossession of Indigenous peoples and nations from their lands. These truths are often invisible to many. The recognition that K-State’s history begins and continues through Indigenous contexts is essential.

This land acknowledgment is a pinnacle of DEI and racialism. It presumes that people of Native American descent need some kind of apology from “white” institutions and America (to be sure, the authors of such statements see America as a colonialist villain unique among history). The statement divides students into race categories (good indigenous student vs. bad, colonizing nonindigenous student). The statement then farcically “apologizes” for land seizures that occurred decades ago and claims it is still

¹ <https://www.k-state.edu/indigenous-alliance/about.html>



engaging in theft but never offer to “return” the land to the Native American tribe that most recently possessed it. Such meaningless tripe is an expression of the authors’ opinion that they are superior to Native Americans and must apologize for that supposed fact. This intentional instillation of race-based victimization culture perpetuates hurtful, race-based stereotypes and wrongfully divides people.

Because this group and the Kansas State land acknowledgment divide and demean² people based on race and ethnicity, offer resources based on race or ethnicity, and promote DEI principles over equality, this violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

27. Kansas State’s Student Government Association (SGA) is engaging in the same subterfuge as the larger university by changing the name of their DEI initiative.

SGA just renamed its DEI department to “Community Engagement.” In doing so, SGA stated that “[t]he Diversity, Equity, Inclusion and Belonging Committee plays a vital role in student programming and educational initiatives” and admittedly changed the name not because SGA is abandoning DEI, but “to better communicate the purpose and intent of the Diversity Programming Fund.” In other words, to further their DEI efforts. In SGA’s own words, “[t]his change ensures that the committee *remains focused* on promoting events and initiatives that enhance student experiences and campus connections.” (emphasis added) SGA’s bill made zero changes to programming or purpose; changes were strictly nominal. Please see the attached March 13, 2025 SGA Agenda.

Because SGA, as outlined in the March 3 complaint, has for years promoted DEI, gender ideology, and racialism, SGA’s commitment to the continued promotion of these same activities but in disguise 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.

28. SGA also uses a land acknowledgment. Please see attached, *supra*. For the same reasons outlined in Allegation 26, this violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

² The Department of Education recently issued guidance clarifying that schools should follow the Supreme Court’s reaffirmance of our courts’ longstanding conception of the principle of equality: “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.” What student could feel “equal” when Kansas State immediately labels him a thief based solely on who his great, great, great, great grandparents may have been? Odious indeed. Read more: <https://www.ed.gov/media/document/frequently-asked-questions-about-racial-preferences-and-stereotypes-under-title-vi-of-civil-rights-act-109530.pdf>



Note for allegations 27 and 28: SGA is part of Kansas State, as outlined in YAF's March 3 complaint. Kansas State has permitted the SGA to use a ".edu" address and to use the school logo and colors. Kansas State has given the SGA a permanent physical office in the school's Student Union building. Kansas State has given the SGA the authority to control important student benefits including the authority to "Allocate \$14 million+ to students every year."³ 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." 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.

Thank you for your attention to these allegations. Please let me know if I can provide any further assistance in holding Kansas State University accountable for these violations.

Sincerely,

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³ <https://www.k-state.edu/sga/>