



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

THE ACTING ASSISTANT SECRETARY

September 23, 2025

Tawana Grover, Ph.D.
Superintendent of Schools
Cedar Rapids Community School District
2500 Edgewood Road N.W.
Cedar Rapids, IA
52405

Dear Superintendent Grover:

This letter is to notify you that the U.S. Department of Education's (Department) Office for Civil Rights (OCR) has identified civil rights compliance issues with Cedar Rapids Community School District (the District). OCR is deeply concerned that the District may be discriminating based on race in violation of Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. Section 2000d *et seq.*, and its implementing regulation at 34 C.F.R. Part 100.

Specifically, OCR understands that the District is limiting participation in programming and educational opportunities based on race, and by disadvantaging staff who are not members of favored racial groups. Additionally, as discussed in several of the District's applications and annual performance reports for its two grants under the Magnet Schools Assistance Program (MSAP), the District is offering a \$3,000 signing bonus for "new hires who are people of color," which is a clear violation of Title VI.

By statute, MSAP provides discretionary grants to local educational agencies (LEAs) or consortia of LEAs to operate magnet schools that promote desegregation in order to "increase interaction among students of different social, economic, ethnic, and racial backgrounds."¹ Prior to grant disbursement, OCR's Assistant Secretary for Civil Rights must sign an assurance that the applicant will "not engage in discrimination based on race, religion, color, national origin, sex, or disability."²

¹ 20 U.S.C. § 7231d(b)(1)(A).

² 20 U.S.C. § 7231d(b)(2)(C), stating that an applicant "will not engage in discrimination based on race, religion, color, national origin, sex, or disability in--

(i) the hiring, promotion, or assignment of employees of the applicant or other personnel for whom the applicant

has any administrative responsibility;

As to OCR's concerns, we held a call with district staff on September 8, 2025, to learn more about these apparently discriminatory practices. The answers that district staff provided to questions asked during the call, and that the staff requested to provide in writing after the call, have done little to address or allay our concerns.

The District's Partnership with the Academy for Scholastic and Personal Success Discriminates by Excluding Students Based on Race.

First, the District is actively involved in a partnership with an outside organization that excludes students based on their race. As the District's [webpage states](#), the Academy for Scholastic and Personal Success (the Academy), through its Academy Expansion (grades 3 through 5), African American Awareness Program (grades 6 through 8), and 6-week summer program (grades 9 through 12) "serves Black, Brown, and biracial students in the Cedar Rapids area, and has partnered with Cedar Rapids Community School District (CRCSD) for nearly two decades," providing "Black, Brown, and biracial students the opportunity for a continuous ASPS experience from third to 12th grade." Nothing in the public-facing materials that OCR has reviewed suggests that the Academy's offerings are open to students of all races. As Dr. Ruth White, the founder and executive director of the Academy, declares in a [promotional video](#), the Academy "unapologetically recruits students of color," and the webpage referenced above states only that, "Students who are interested in joining an ASPS program should speak with their school counselor or teacher."

The District's teachers provide instruction during the school year to participants in the African American Awareness Program, and the Academy Expansion for elementary students "is housed" at Johnson STEAM Academy, one of the project schools funded by CRCDS's 2022 cohort MSAP grant. The District's use of federal funding from a program designed to decrease segregation *to segregate* students based on race is at once shamefully ironic and manifestly unlawful.

In *Students for Fair Admissions v. Harvard (SFFA)*, the Supreme Court held that, under the Fourteenth Amendment's Equal Protection Clause and Title VI, every university applicant "must be treated based on his or her experiences as an individual—not on the basis of race."³ In reaching its decision, the Court emphasized

(ii) the assignment of students to schools, or to courses of instruction within the schools, of such applicant, except
to carry out the approved plan; and
(iii) designing or operating extracurricular activities for students[.]”

³ 600 U.S. 181, 231 (2023).

that “universities have for too long done just the opposite,” that universities in doing so “have concluded, wrongly, that the touchstone of an individual’s identity is not challenges bested, skills built, or lessons learned, but the color of their skin,” and that “[o]ur constitutional history does not tolerate that choice.”⁴ Thus, the Court confirmed what common experience teaches: “Racial discrimination is invidious in all contexts.”⁵

At bottom, *SFFA* confirms what Title VI prohibits: “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.” The District’s partnership with the Academy, however, is designed for and exclusive to “Black, Brown and biracial students.” This is textbook discrimination on the basis of race, and no justification proffered by the District can overcome the patent illegality of its racially exclusionary plan.⁶ As Justice Clarence Thomas explained, “racial discrimination based on benign prejudice is just as noxious as discrimination inspired by malicious prejudice. In each instance, it is racial discrimination, plain and simple.”⁷

Second, the District’s racialized policies related to recruitment, hiring, and promotion appear to discriminate based on race. As the District stated in its recent annual performance reports for both grants:

In 2023, CRCSD implemented a signing bonus for candidates who can demonstrate evidence of successful experience with and in racially and/or ethnically diverse environments. This program was specifically aimed at attracting minority teachers by offering a \$3000 bonus for new hires who are people of color. This program helped attract a more diverse pool of applicants and fill 67 open positions in the summer and fall of 2023. CRCSD seeks to continue this practice within the proposed project schools.

The reports state that, “CRCSD has developed staff affinity groups to create community and social opportunities for diverse employees. Current groups include: LGBTQ+, Latinx, Black/African American.” They go on to note that, “In addition to the affinity groups, CRCSD has launched an Black/African-American employee resource group that will work to develop recommendations to build promotion and professional development opportunities for diverse employees.” A District staff official said during a recent call with OCR that these opportunities were spread through word of mouth. It

⁴ *Id.*

⁵ *Id.* at 214 (cleaned up).

⁶ See *SFFA*, 600 U.S. at 214 (“Racial discrimination is invidious in all contexts.”) (cleaned up); *id.* at 206 (“Eliminating racial discrimination means eliminating all of it.”).

⁷ *Adarand Constrs., Inc. v. Pena*, 515 U.S. 200, 241 (1995) (Thomas, J., concurring).

strains credulity to assume that such a comprehensive race-focused policy mandated by the school board and implemented by District officials is not resulting in discriminatory practices against job applicants, faculty, and staff.

The District's \$3,000 Signing Bonus for New Hires of Color is Illegal.

Third, the District's MSAP reports state, and the District's chief of human resources confirmed during the recent call with OCR, that the District offered a \$3,000 signing bonus for new hires of color. In so doing, the District is engaging in precisely the kind of discrimination that Title VI was enacted to remedy and prevent. The inexorable command of *SFFA* applies here: "Eliminating racial discrimination means eliminating all of it."⁸ Put differently, "[t]he way to stop discrimination on the basis of race is to stop discriminating on the basis of race."⁹ The District has failed to do so.

As a result of these findings, unless the District comes into compliance with Title VI, I will not certify its grant under 20 U.S.C. § 7231d(c).

The District Must Come into Compliance with Title VI.

To resolve these concerns, OCR requires that Cedar Rapids Community School District comply with Title VI and take the following steps:

1. Terminate its partnership with the Academy for Scholastic and Personal Success and all associated programming, and ensure that any programs, resources or educational benefits are provided to students based on race-neutral criteria.
2. Issue a public statement to parents, students, and staff notifying them that the district is ending its partnership with the Academy for Scholastic and Personal Success and all associated programming and that any programs, resources or educational benefits that are provided to students will be done so based on race-neutral criteria and in a manner that does not violate Title VI.
3. Rescind any guidance which violates Title VI, remove or revise any internal and public-facing statements or documents that are inconsistent with Title VI, and notify all parents, students, and staff of such rescissions and revisions.
4. Issue a public statement to all employees notifying them that any and all affinity groups and employee resource groups will be open to any eligible employee regardless of race.

⁸ 600 U.S. at 206.

⁹ *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007).

5. Develop and publicly post a human resource policy that makes clear that the District will no longer provide financial incentives or remuneration to employees or prospective employees based on race and distribute any future or available but as-yet-to-be-allocated funds to employees or prospective employees in a way that does not violate Title VI.
6. Issue a public statement to all district employees notifying them of the human resource policy and apologizing for discriminating based on race in the allocation of the \$3,000 signing bonus in violation of Title VI.

Please notify OCR within five (5) days of receipt of this letter whether the District will agree to take the remedial steps outlined here to ensure it is in compliance with Title VI.

Sincerely,



Craig W. Trainor
Acting Assistant Secretary for Civil Rights

CC: Jillian Schulte, Administrator to the Office of the Superintendent
Adam Zimmerman, Chief of Innovation & Research
Darius Ballard, Chief of Human Resources
Elizabeth Jacobi, Chief Compliance Officer