



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS  
ADMINISTRATIVE COMPLAINT

March 10, 2025

United States Department of Education  
Office for Civil Rights  
Lyndon Baines Johnson Department of Education Building  
400 Maryland Avenue, SW  
Washington, DC 20202-1100  
Via Email: OCR@ed.gov

To Whom It May Concern:

This is a federal civil rights complaint pursuant to the U.S. Department of Education's (Department) Office for Civil Rights' (OCR) discrimination complaint resolution procedures.

Awake Illinois brings this complaint against the Illinois State Board of Education (ISBE) for discrimination on the basis of race in programs or activities that receive federal financial assistance in violation of both Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d *et seq.*, and the Equal Protection Clause of the 14th Amendment to the U.S. Constitution.

Awake Illinois makes this complaint as an interested social welfare nonprofit organization with members who are parents of school children in Illinois and members who are educators in the state of Illinois. Awake Illinois and its members oppose discrimination on the basis of race in any state programming.

The Illinois State Board of Education consistently promotes and funds an initiative via Teach Plus that leads affinity group programming "for educators who identify as people of Color" and "facilitators will receive training and leadership coaching, plus a \$2,500 stipend" (Ex. A at 1). Exhibit A shows the program launched in 2022 and explains "ISBE announces \$2 million effort to support and retain teachers of color". (Ex. A at 2). The affinity groups "will inform local district leaders on ways to improve working conditions and experiences for teachers of color" (Ex. A at 2). The 2024 IL General Assembly budget granted \$1 million to ISBE for the Teach Plus Affinity Group program (Ex. A at 3).

The Google form linked at ISBE for interested parties clearly states Affinity Groups "are open to educators of color" and notes "**some groups are only open to educators of color**" and states "affinity groups are focused on racial identity plus other intersectionality markers". (Ex. A at 4). According to TeachPlus, one affinity group seeks to "create a safe and brave space for all district educators who identify as Black, Indigenous, or People of Color (BIPOC) to begin or continue their journey of healing from the invisible tax that so many experience while working in the field of education". (Ex. A at 5).



Attached to this complaint is evidence in the form of website snapshots and Google submission forms (Exhibit A).

As the Department of Education is no doubt aware, discrimination on the basis of race raises concerns that the IL State Board of Education has received federal funds in violation of Title VI of the Civil Rights Act of 1964, which declares 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.” The equal protection guarantee of the Constitution’s Fourteenth Amendment protects individuals from government discrimination due to arbitrary classifications like race.

Excluding teachers from state-funded “affinity groups” because of their race blatantly violates the Equal Protection Clause. If ISBE wants to fund educator initiatives, it can do so. What it can’t do is use race to favor certain educators at the expense of equal opportunity for others. Given the \$2.25 billion of federal funding that has been requested from ISBE, fiscal stewardship would demand no funds be appropriated to unconstitutional programming. To do so puts those federal funds in jeopardy.

Accordingly, we ask that the Department promptly investigate the allegations in this complaint, act swiftly to remedy unlawful policies and practices, and order appropriate relief. Thank you for your prompt assistance with this request for investigation and resolution. Please contact me for further information.

Sincerely,

Shannon M. Adcock

Founder and President, Awake Illinois



# EXHIBIT A



## + Teach Plus Illinois Affinity Groups



The Illinois Affinity Group Network seeks to cultivate authentic, inclusive, intersectional spaces, shaped by and for educators of color. These affirming and supportive spaces, rooted in an asset-based understanding of diversity, will support educators in navigating and improving their school environments and will be connected to a larger network to build alliances and address systemic issues.



### + Find Your County

Select County



<https://teachplus.org/illinois-affinity-groups/>

**Illinois State Board of Education**  
@ISBNews

...

The FY2025 state budget includes funding to continue the Illinois Affinity Group Network!

@TeachPlusIL is now accepting applications for facilitators. Facilitators will receive training and leadership coaching, plus a \$2,500 stipend. Email [ncortes@teachplus.org](mailto:ncortes@teachplus.org) to apply.

## Illinois Affinity Group Network Continues to Grow



10:55 AM · Jun 24, 2024 · 485 Views

Ex. A at 1

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For Immediate Release  
Monday, February 28, 2022

## ISBE ANNOUNCES \$2 MILLION EFFORT TO SUPPORT AND RETAIN TEACHERS OF COLOR

### *AFFINITY GROUPS WILL BRING TEACHERS OF COLOR TOGETHER TO EXAMINE LOCAL ISSUES AND MAKE RECOMMENDATIONS TO DISTRICT LEADERS*

SPRINGFIELD - The Illinois State Board of Education (ISBE) today announced a \$2 million effort to support and retain teachers of color. ISBE will establish a statewide system of affinity groups in partnership with Sangamon-Menard Regional Office of Education 51 (ROE 51) and Teach Plus. The groups will bring teachers of color together to examine issues facing them, including the causes of attrition, and to develop policy recommendations. The recommendations will inform local district leaders on ways to improve working conditions and experiences for teachers of color.

"Establishing affinity groups will bolster ISBE's efforts to create an equitable education system for both students and staff," said State Superintendent of Education Dr. Carmen I. Ayala. "All students benefit when they have teachers who are diverse, experienced, and supported while educators of color benefit by the additional supports of affinity groups. These factors are critical since Illinois' learning renewal and recovery strategies depend on an effective, sustained educator workforce."

ISBE began reporting the three-year teacher retention rate disaggregated by race/ethnicity for the first time in 2021. The data show that Illinois schools retain Black teachers at the lowest rate of all teacher groups - 80.6 percent. That compares to an 87.6 percent rate for White teachers.

Retaining a higher rate of current teachers of color will help Illinois meet its overall high demand for teachers. Research from the [Learning Policy Institute](#) also shows that teachers of color boost the academic performance of students of color, including better reading and math test scores, higher graduation rates, and increased aspirations to attend college. Studies show that students taught by teachers of the same race/ethnicity are less likely to be chronically absent and less likely to experience exclusionary discipline.

The program will run for two and half years and be funded with federal Elementary and Secondary School Emergency Relief II funds. ROE 51 will administer the program in partnership with Teach Plus, a national nonprofit organization that develops and empowers teacher leaders. Teach Plus has facilitated projects focused on [retaining teachers of color in Illinois](#) and has implemented an affinity group structure in other states.

"The Sangamon-Menard Regional Office of Education is proud to partner on this initiative that addresses the retention of teachers of color," said Regional Superintendent Shannon Fehrholz of ROE 51. "The program will bring together groups of teachers of color from districts across the state to identify and address local issues contributing to the lower retention rates of teachers of color by developing partnerships that will provide access to coaching, mentoring, and teacher leadership opportunities."

"I'm thrilled to embark on this work in partnership with ISBE," said Teach Plus Illinois Executive Director Josh Kaufmann. "Teach Plus is focused on ways to retain talented teachers of color in the classroom. Affinity groups, where educators of color can gather safely to examine key issues, are a critical strategy in helping us create an equitable education system for teachers and students in our state. Teach Plus and Teach Plus teacher leaders look forward to helping build a system where educators of color will be able to work within the affinity groups to support each other and to identify barriers to retention and propose solutions to their school districts."

Justin Johnson, the 2021 Illinois Teacher of the Year, is a Teach Plus Policy Fellowship alumnus. He has focused his state-funded sabbatical this school year on speaking engagements, equity-focused professional development, and career guidance with a specific focus on increasing the recruitment and retention of diverse teachers.

"When we gather in places where there is a shared identity, it allows for authentic conversations about issues related to lived experiences," said Johnson, who is the band instructor in Niles Township High Schools District 219 in Skokie. "This creates space to discuss how improvement can be made to improve the climate and culture within the systems of education. If we want to truly improve the diversity within the teacher pipeline and the retention of those educators, it must begin with creating a safe space for those voices and valuing those voices when they speak."

The project will begin with a planning period in which ROE 51, in partnership with Teach Plus, will develop a comprehensive implementation plan and conduct outreach to educators of color in the state.

Educators interested in learning more about or participating in this initiative can contact Kaufmann at [jkaufmann@teachplus.org](mailto:jkaufmann@teachplus.org).

Share!

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<https://www.isbe.net/Lists/News/NewsDisplay.aspx?ID=1394>

Ex. A at 2



 \$589 103RD GENERAL ASSEMBLY

836 / 3389 | — 100% + |  

Section 120. The amount of \$1,000,000, or so much thereof as may be necessary, is appropriated from the General Revenue Fund to the Illinois State Board of Education for a grant to Teach Plus Illinois for the Affinity Groups program.

<https://www.ilga.gov/legislation/publicacts/103/PDF/103-0589.pdf> (Page 836)

*Ex. A at 3*



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Learning Renewal

Affinity Groups

LEARNING RENEWAL

AFFINITY GROUPS

RESOURCES

- 2022-2023 IL Affinity Group Network Report

The Illinois State Board of Education is establishing affinity groups for educators of color through a partnership with Sangamon-Rensselaer Regional Office of Education 91 and Teach Plus Illinois. The affinity groups will bring educators of color together to build a supportive community, examine current issues they face, and make recommendations that address those issues.

[Submit the Interest Form to Join an Affinity Group](#)

BACKGROUND INFORMATION

The affinity groups are part of ISBE's three-year Strategic Plan to support educator retention by leveraging partnerships that will provide access to coaching, mentoring, and teacher leadership opportunities. ISBE began reporting the three-year teacher retention rate disaggregated by race/ethnicity for the first time in 2021. The data show that Illinois schools retain Black teachers at the lowest rate of all teacher groups - 80.9 percent, compared to an 87.8 percent rate for White teachers. Research from the Learning Policy Institute also shows that teachers of color boost the academic performance of students of color, including better reading and math test scores, higher graduation rates, and increased aspirations to attend college. Studies show that students taught by teachers of the same race/ethnicity are less likely to be chronically absent and less likely to experience exclusionary discipline.

ILLINOIS AFFINITY GROUP FACILITATORS NETWORK

The Illinois Affinity Group Facilitators Network is led by and for teachers of color. The network is home to 46 facilitators who were selected to bring together groups of teachers of color to identify and address local issues that contribute to the lower retention rates of teachers of color. The facilitators will work in various regions across the state to bring together educators to develop recommendations to retain teachers of color. The affinity groups have access to implementation funds to support group activities, including stipends for participants serving on advisory action teams.

To view a list of affinity groups, visit the Teach Plus Illinois website.

Educators interested in joining an affinity group or learning more can fill out an interest form.

CONTACT INFORMATION

<https://www.isbe.net/Pages/LR-Affinity-Groups.aspx>

Illinois Affinity Group Network Interest Form

Thank you for your interest in the Illinois Affinity Group Network! Affinity Groups that are part of this network will launch in September for the 2023-24 school year. If you are interested in finding out more about an affinity group(s), please leave your contact information and complete the questions below.

Please Note: Affinity Groups within this network are part of the Illinois State Board of Education (ISBE), Illinois Affinity Group Network (IAAGN) Initiative for Educators of Color. You can find out more about this ISBE initiative through these links:

- [ISBE Press Release](#)
- [ISBE Learning Renewal Information](#)
- [Teach Plus About Affinity Group Facilitators](#)

Switch account

\* Indicates required question

Email \*

Your email

Name (First & Last) \*

Your answer

District/School Email Address \*

Your answer

Phone Number \*

Your answer

Share with us why you are seeking out an affinity group, and any other information that will help us connect you with a group in our network.

Your answer

Current District \*

Your answer

Affinity Groups within this Network are open to educators of color across the state of Illinois. Please note that some groups listed within this network are only open to educators of color within the listed group's district; other groups are open to educators of color within the group's district as well as to educators of color from nearby and neighboring districts.

To better match you with an affinity group, we have some additional questions below. Affinity groups are focused on racial identity plus other intersectional identity markers. The information you provide below will help us connect you with groups for more information.

Race, Ethnicity, and Other Identity Markers \*

☐ Asian-American Pacific Islander (AAPI)  
☐ Afro-Latinx  
☐ Black/African American  
☐ Black, Indigenous, and People of Color (BIPOC) including BI/Multi Racial  
☐ Latino/a/x, Hispanic  
☐ Middle Eastern, North African, Asian (MENA)  
☐ Native American/Indigenous  
☐ LGBTQ+  
☐ Man-Male Identifying  
☐ Nonbinary Identifying  
☐ Woman-Female Identifying  
☐ Other:

Current Role \*

☐ Teacher  
☐ Paraprofessional  
☐ Other professional staff (for example: counselor, speech pathologist, nurse, etc.)  
☐ School operational staff (for example clerk, custodian, bus drivers, etc.)  
☐ Administrator  
☐

[https://docs.google.com/forms/d/e/1FAIpQLSe4yBe\\_yY4A3WA53\\_ktrZI\\_OUIgC9gNESWmJra9uPcgEbJtkg/viewform](https://docs.google.com/forms/d/e/1FAIpQLSe4yBe_yY4A3WA53_ktrZI_OUIgC9gNESWmJra9uPcgEbJtkg/viewform)

Ex. A at 4



## Rock Island

### East Moline School District 37

- **Open to district employees only**
- **Racial & Other Identify Markers Focus:** Black, Indigenous, and People of Color (BIPOC)
- The East Moline School District 37 Affinity Group seeks to create a safe and brave space for all district educators who identify as Black, Indigenous, or People of Color (BIPOC). The space is designed to honor the individuals of the group by providing a place to gather, collaborate, connect and encourage one another. The group will embrace and work towards the vision of creating a sustainable inclusive atmosphere for all BIPOC throughout the EMSD37. In addition, the Affinity Group will serve as place for Educators of Color to begin or continue their journey of healing from the invisible tax that so many experience while working in the field of education.

*<https://teachplus.org/illinois-affinity-groups/>*