

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA,

Plaintiff,

V.

Civil Action No. 1:25-cv-466

**STATE OF RHODE ISLAND,
RHODE ISLAND DEPARTMENT OF
EDUCATION,**

COMPLAINT

and

**PROVIDENCE, RHODE ISLAND,
PUBLIC SCHOOL DISTRICT,**

Defendants.

Defendants.

INTRODUCTION

The United States brings this action to stop the Rhode Island Department of Education (RIDE) and Providence Public School District (PPSD) from discriminating against teachers based on their race in violation of federal law. Through PPSP’s “Educators of Color Loan Forgiveness Program” (Program), new teachers can receive student-loan repayments up to \$25,000. The catch: white teachers are not eligible. By its own terms, the purpose of the Program is to aid PPSP’s efforts to recruit a more “diverse” faculty. But in doing so, RIDE and PPSP engage in blatant race discrimination, which federal law has long prohibited.

The Program is a joint effort between PPSD, RIDE, and the Rhode Island Foundation (RIF). In 2019, RIDE took over management of PPSD, including the administration of PPSD's faculty incentive programs. In 2021, RIDE and PPSD partnered with RIF, a publicly supported non-profit, to fund the Program to recruit more non-white teachers to the district. The Program

opened applications to all newly hired *non-white* PPSD teachers with at least \$5,000 in student debt.

This is race discrimination in public employment, pure and simple. The agreement with RIF requires PPSD to create the Program application, review application submissions, and approve teachers for participation in the Program. RIF merely writes the checks. Loan forgiveness available only to PPSD teachers is plainly a “privilege” and “opportunity” of employment within the district. And RIDE and PPSD are intimately involved with distributing this benefit to preferred employees based on their race.

Helping new teachers pay off their student loans may be a worthy endeavor for public school districts. But excluding white teachers is racist and unlawful. RIDE and PPSD’s exclusionary Program constitutes a pattern or practice of race discrimination in public employment, which violates Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* (Title VII). The United States brings this action to end the unlawful Program and ensure that RIDE and PPSD stop racially discriminating against public school teachers.

JURISDICTION AND VENUE

1. This court has subject matter jurisdiction over this action under 42 U.S.C. § 2000e-6(b) and 28 U.S.C. §§ 1331, 1343(a)(3), and 1345.
2. Venue is proper in the United States District Court for the District of Rhode Island pursuant to 28 U.S.C. § 1391(b) because a substantial part of the acts and omissions giving rise to this action occurred in this judicial District of Rhode Island.

PARTIES

3. Plaintiff United States is expressly authorized to bring this action by Section 707 of Title VII, 42 U.S.C. § 2000e-6.

4. Defendant Rhode Island Department of Education (RIDE) is a governmental entity created pursuant to the laws of the State of Rhode Island.

5. RIDE is a “person” within the meaning of 42 U.S.C. § 2000e(a) and an “employer” within the meaning of 42 U.S.C. §2000e(b).

6. Defendant Providence Public School District (PPSD) is a governmental agency created pursuant to the laws of the State of Rhode Island.

7. PPCD is a “person” within the meaning of 42 U.S.C. § 2000e(a) and an “employer” within the meaning of 42 U.S.C. § 2000e(b).

FACTS

8. In April 2019, Rhode Island Governor Gina Raimondo, Providence Mayor Jorge Elorza, and RIDE’s Commissioner of Education Angélica Infante-Green requested a review of PPCD’s performance of its educational functions.

9. In October 2019, RIDE issued an “Order of Control and Reconstitution” (Order) over PPCD pursuant R.I. Gen. Laws 16-7.1-5 due to a finding that PPCD was one of Rhode Island’s lowest-performing school districts. RIDE Order No. 19-089.

10. Under the Order, RIDE’s Commissioner took significant control of PPCD, including its budget, programming, and personnel.

11. RIDE exercises this control in collaboration with PPCD.

12. On April 15, 2021, PPCD, RIDE, and the Rhode Island Foundation (RIF), a private non-profit organization, entered into a memorandum of agreement establishing a student loan repayment program “dedicated to the recruitment and retention of teachers of color.” Ex. 1, Mem. of Agreement between the Providence Public School District, the Rhode Island

Department of Elementary and Secondary Education, and the Rhode Island Community Foundation, dated April 15, 2021 (MOA), at 1.

13. Defendants and RIF established the “Educator of Color Loan Forgiveness Program” (Program) pursuant to the MOA.¹

14. RIF pledged to raise at least \$3,175,00.00 over at least five years to fund the Program. MOA, at 1.

15. RIF agreed to make student loan payments on a yearly basis for eligible teachers. MOA, at 1.

16. The Program is an “incentive” to “encourage teachers of color” to teach at PPSD. MOA, § 2.a.

17. The MOA obligates PPSD to “recruit and retain up to 127 teachers of color over five years” MOA, § 2.c.ii.

18. The Program aims to increase the diversity of PPSD teachers.²

19. The MOA limits eligibility for student loan repayment to “new teachers of color” employed at PPSD.

20. “New teachers of color” include teachers “in their first year of full-time (non-substitute) teaching in the District who identify as Black, Hispanic, Asian, American Indian, and/or 2 or more races.” MOA, § 2.c.i.

21. The MOA permits Defendants to give a preference to PPSD teachers who identify as black. MOA, § 2.c.i.

¹ Educator of Color Loan Forgiveness Program, [Perma | www.providenceschools.org](https://www.providenceschools.org), (June 6, 2025).

² Building on Hope, Report on the Providence Public Schools’ Turnaround Action Program, at 8 (January 2025), [Perma | resources.finalsite.net](https://resources.finalsite.net) (Sept. 4, 2025).

22. PPSD created eligibility criteria for participation in the Program. *See* MOA, § 2.c.i.

23. PPSD made “new teachers of color” with a minimum of \$5,000 in student loans eligible Program applicants.

24. PPSD did not make teachers who identify as white eligible to participate in the Program.

25. Newly hired teachers of color accepted into the Program receive student loan repayment of up to \$25,000 in their first three years teaching in PPSD. MOA, § 2.c.ii.

26. Program participants receive up to \$6,000 in student loan payments after the completion of one year teaching in PPSD, up to \$8,500 after the completion of two years teaching in PPSD, and up to \$10,500 after the completion of three years teaching in PPSD. MOA, § 2.c.ii.

27. PPSD created an application to participate in the Program. *See* MOA, § 2.c.i.

28. The Program application requires applicants to provide their “Ethnicity,” with checkboxes to select from the following options: Black, Latinx, Asian/Pacific Islander, Indigenous American, Two or More, Other.

29. PPSD has received Program applications directly from applicants.

30. PPSD has reviewed Program applications and approved new teachers of color for the Program if they met the eligibility criteria: being a new PPSD teacher, being a teacher of color, and having a minimum of \$5,000 in student loans.

31. After approving candidates for the Program, PPSD has sent lists of approved applicants to RIF, which coordinates loan repayments to the Rhode Island Student Loan Authority for payment to the underlying loan providers.

32. PPSD began accepting applications for the Program in School Year 2021-2022.

33. PPSD accepted applications for the Program for at least four school years: School Year 2021-2022, 2022-2023, 2023-2024 and 2024-2025. On information and belief, the Program continues to operate on behalf of applicants accepted into the Program.

34. On information and belief, only applicants who identify as “teachers of color” have received student loan repayment funds through the Program.

35. On information and belief, during school years 2021-2022 to 2023-2024, PPSD hired 491 non-minority teachers, none of whom received student loan repayment funds through the Program.

CLAIM – SECTION 707 OF TITLE VII

36. The United States realleges and incorporates herein by reference the allegations set forth in all the above paragraphs numbered 1-35.

37. Since 2021, Defendants have engaged in a pattern and practice that discriminates against PPSD teachers who do not identify as “teachers of color” on the basis of race in violation of Section 703(a)(1) and (2) of Title VII, 42 U.S.C. § 2000e-2(a)(1) & (2) by offering and providing student loan repayment to “teachers of color” while excluding teachers who do not identify as “teachers of color” from the Program.

38. The United States, through the United States Department of Justice, has investigated the Defendants’ creation and use of the Program. The United States has notified Defendants of that investigation and the United States’ determination that the Defendants’ use of the Program described in paragraphs 12-35 is unlawful.

39. When the United States notified the Defendants of the investigation, the Defendants were actively engaged in discrimination in violation of Title VII through the Program, and they continue to engage in such discrimination.

40. Defendants' use of the Program described in paragraphs 12-35 is "a pattern or practice of resistance to the full enjoyment of" the right of PPSD teachers who do not identify as "teachers of color" to equal employment opportunities without discrimination based on race, in violation of Section 707 of Title VII, 42 U.S.C. § 2000e-6.

PRAYER FOR RELIEF

WHEREFORE, the United States prays that this Court enter judgment against RIDE and PPSD and grant the following relief:

- a. A declaratory judgment that Defendants' pattern and practice related to the Program discriminate on the basis of race in violation of Title VII;
- b. A permanent injunction prohibiting Defendants, and their officers, agents, employees, successors, and attorneys, and other persons who are in active concert or participation with Defendants, from further violating Title VII by implementing the Program, or any other similar program, on the basis of race;
- c. An award of equitable relief to non-minority new PPSD teachers who were not eligible for the Program on the basis of race;
- d. An award of any applicable costs and fees; and
- e. An award of all such other additional relief as the interests of justice may require.

Dated: September 16, 2025

Respectfully submitted:

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

ERIC SELL
Counsel
Civil Rights Division

JEFFREY MORRISON
Acting Chief
Employment Litigation Section
Civil Rights Division

/s/ Robert L. Galbreath
HILARY PINION
Acting Principal Deputy Chief
VA Bar Number 46872
ROBERT L. GALBREATH
Senior Trial Attorney
D.C. Bar Number 460389
Employment Litigation Section
Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street, N.E., Suite 9.1140
Washington, D.C. 20530
Phone: (202) 532-5157
Fax: (202) 514-1005
Email: Robert.Galbreath@usdoj.gov