



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

July 21, 2025

Via e-mail only to: [REDACTED]

William A. Jacobson, Esq

Re: Western Michigan University – OCR Case Number 15-25-2259

Dear Mr. Jacobson:

On July 9, 2025, the United States Department of Education, Office for Civil Rights (OCR), received the complaint you filed against Western Michigan University (the University). The complaint alleged that the University discriminates on the basis of race, color, or national origin by offering, promoting or administering the following scholarships:

1. WMU Undocumented/DACA Scholarship
2. Doctors Paul Brown & Bassett Brown and the V. Delores Brown Scholarship
3. Dr. William F. Pickard Endowed Scholarship
4. Elissa Gatlin Endowed Scholarship
5. Dulcet Scholarship

The complaint further alleges that the University discriminates based on sex by offering, promoting, or administering the following scholarships that are unrelated to athletics:

6. Dr. Susan Burns Scholarship
7. Lilian Meyer Scholarship
8. Edythe Mange Distinguished Scholarship

OCR enforces Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d - 2000d-7, and its implementing regulation at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, or national origin by recipients of federal financial assistance. OCR also enforces Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §§ 1681 *et seq.*, and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex in any education program or activity operated by a recipient of federal financial assistance from the Department. Because the University receives federal financial assistance from the Department, OCR has jurisdiction over the University under Title VI and Title IX.

OCR will investigate whether the University violates Title VI or Title IX by offering, promoting, or administering the above-listed scholarships.

Please note that opening an investigation does not mean that OCR has made a final determination with regard to the merits. During the investigation, OCR is neutral; OCR will collect and analyze the evidence it needs in order to make a decision about the complaint. OCR

will ensure that its investigation is legally sufficient in accordance with OCR's [Case Processing Manual \(CPM\) \(February 19, 2025\)](#) and OCR's [Complaint Processing Procedures](#). The complainant may have the right to file a private suit in federal court whether or not OCR finds a violation.

OCR may close this complaint prior to making formal findings of compliance or non-compliance, provided that the circumstances or information gathered establish an administrative or other basis for resolution in accordance with the CPM. For example, Section 110 of OCR's CPM provides that OCR may use an expedited case processing approach to resolve complaints called the Rapid Resolution Process (RRP). The outcomes in all RRP cases must meet OCR's standards for legal sufficiency and be consistent with applicable statutory and regulatory authority. Any resolution agreement reached through RRP must be aligned with the allegations in the complaint deemed appropriate for resolution pursuant to RRP.

If OCR determines during the course of the investigation that a complaint could be appropriate for mediation, OCR will contact the parties and offer this resolution option.

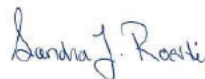
Please be advised that the University must not harass, coerce, intimidate, discriminate, or otherwise retaliate against an individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a retaliation complaint with OCR.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. If OCR receives such a request, it will seek to protect, to the extent provided by law, personally identifiable information, that, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

When contacting OCR about this complaint, please include in the subject line of any e-mail correspondence and in any other communication, a reference to the case number at the top of this letter.

If you have any questions, please contact [REDACTED], who is the attorney assigned to investigate this complaint and can be reached by telephone at [REDACTED] or by e-mail at [REDACTED].

Sincerely,

A handwritten signature in cursive script that reads "Sandra J. Roesti".

Sandra J. Roesti
Team Leader