



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

9<sup>TH</sup> FLOOR, 5 POST OFFICE SQUARE  
BOSTON, MA 02109-3921

REGION I

CONNECTICUT  
MAINE  
MASSACHUSETTS  
NEW HAMPSHIRE  
RHODE ISLAND  
VERMONT

January 6, 2025

Via e-mail only to: [REDACTED]

William A. Jacobson

Re: University of Rhode Island – OCR Case Number 01-25-2048

Dear William A. Jacobson:

On December 11, 2024, the U.S. Department of Education, Office for Civil Rights (OCR), received the complaint you filed against the University of Rhode Island (the University) alleging that the University discriminates on the basis of race, color, or national origin by offering the following 28 scholarships that are restricted to, or include preferences for, students of particular races, colors, or national origins:

1. [Alumni of Color Network Scholars Fund](#)
2. [Benson Scholarship Endowment](#)
3. [Dubee Family Endowment Scholarship](#)
4. [George Wiley Memorial Endowed Scholarship](#)
5. [Keeping the Promise Scholarship](#)
6. [Monica J. Garnes '94 Endowed Business Scholarship](#)
7. [Bank of America Scholarship](#)
8. [Beatrice & Tom Garrick, Sr. Endowed Scholarship](#)
9. [Citizens Bank Endowed Scholarship](#)
10. [Deborah Godfrey Brown Leadership Award](#)
11. [Dr. Robert L. Carothers Student Leadership Endowment](#)
12. [Mattoon-Kline Scholarship in GSLIS](#)
13. [Deborah Godfrey Brown Nursing Scholarship](#)
14. [Dr. Adolphus Hailstork III Music Scholarship for Minority Students](#)
15. [George & Lois Graboys Minority Student Endowment](#)
16. [GSLIS Prism Scholarship Endowment](#)
17. [Herschel I. & Suzanne Oringel Grossman Economics Scholarship](#)
18. [Higgins Family Endowed Scholarship](#)
19. [Howard & Mary Frank Scholarship Endowment](#)
20. [Hyman Fradin Scholarship Endowment](#)
21. [James '76 & Nancy '77 Sarra Forte Scholarship – Nursing](#)
22. [James '76 & Nancy '77 Sarra Forte Scholarship – Business](#)
23. [Minority Scholarship Endowment](#)
24. [Miya D. Brophy-Baermann Scholarship Fund](#)
25. [Mary Braga Scholarship](#)
26. [Douglas & Jennifer Cote Endowed Scholarship](#)
27. [Day Family Scholarship Endowment](#)
28. [URI Journalism Student Scholarship](#)

The complaint also alleges that the University discriminates on the basis of sex by offering the following 28 scholarships that are restricted to, or include preferences for, students of a particular sex:

29. [Miya D. Brophy-Baermann Scholarship Fund](#)
30. [Douglas & Jennifer Cote Endowed Scholarship](#)
31. [Day Family Scholarship Endowment](#)
32. [Marsha G. Meltcalf Scholarship Fund](#)
33. [Nikki Noya Fields Family Scholarship](#)
34. [Suita/Hamming Endowed Scholarship](#)
35. [Andrew J. Newman & John W. Chapman Scholarship](#)
36. [Mary Braga Scholarship](#)
37. [URI Journalism Student Scholarship](#)
38. [Amy Janes Bare Memorial Endowment](#)
39. [Dr. M. Beverly Swan Scholarship Endowment](#)
40. [Dr. Mary A. Silverman Ravin '44 Endowed Scholarship](#)
41. [Eleanor M. & Oscar M. Carlson Scholarship](#)
42. [Epi-Vax Polly Matzinger Biotechnology Scholarship](#)
43. [Gene Bucci Family Scholarship](#)
44. [Jean Louise Pimental '70 Memorial Scholarship](#)
45. [Jennifer Bolig & David Martirano Scholarship Women in Business](#)
46. [Lois Vars Scholarship](#)
47. [Madelyn Grady Geisser Endowed Scholarship](#)
48. [Mary L. Robinson Scholarship Fund](#)
49. [Rosario J. Lombardo, '43, '47 Scholarship in Engineering](#)
50. [Rox-Ellene Greenlaw Memorial English Scholarship](#)
51. [Theresa Laffey Newton Scholarship Fund](#)
52. [William J & Lindell Clark Northup Scholarship Fund for Health Sciences](#)
53. [The Women in Business Endowed Scholarship](#)
54. [Women in Engineering Scholarship founded by The Greichen Family](#)
55. [Women Transforming Women Endowed Scholarship Fund](#)
56. [Karen L. Adams Endowed Scholarship in Communications](#)

OCR enforces Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d et seq., and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination based on race, color, and 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 regulations 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. As a recipient of federal financial assistance from the Department of Education, the University is subject to these laws.

Pursuant to Federal court orders, the Department is currently enjoined from enforcing the 2024 Title IX [Final Rule](#) with respect to the University. Pending further court orders, the Department's Title IX regulations, as amended in 2020 ([2020 Title IX regulations](#)) remain in effect with respect to the University. Therefore, the 2020 Title IX regulations serve as the basis for OCR's determination in this matter.

OCR evaluated this complaint in accordance with OCR's [Case Processing Manual \(CPM\) \(July 18, 2022\)](#) and has decided to open Allegations 1–35 for investigation. However, OCR is dismissing Allegations 36–56 for the reasons set forth below.

### **Allegations Being Dismissed**

Section 110(j) of OCR's CPM states that OCR may close or dismiss an allegation if it has recently addressed or is currently addressing the same allegation involving the same recipient in a compliance review, directed investigation, or OCR complaint. OCR is currently addressing Allegations 36–52 in OCR Case Number 01-20-2030, Allegations 53–55 in OCR Case Number 01-23-2006, and Allegation 56 in OCR Case Number 01-19-2104. Accordingly, OCR is dismissing Allegations 36–56 as of the date of this letter.

### **Allegations Being Opened for Investigation**

OCR will investigate whether the University discriminates on the basis of race, color, or national origin by administering the scholarships referenced in Allegations 1–28, in violation of 34 C.F.R. § 100.3(a) and (b). OCR will also investigate whether the University discriminates on the basis of sex by administering the scholarships referenced in Allegations 29–35, in violation of 34 C.F.R. § 106.37.

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 CPM. Additional information is available at [Complaint Processing Procedures](#). Please note that you may have the right to file a private suit in federal court whether or not OCR finds a violation.

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.

With respect to the allegations OCR is dismissing, this letter sets forth OCR's determination in an individual OCR case. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public.

Recipients 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.

OCR will communicate with you periodically during its investigation. When contacting the office about your case, please refer to the case number at the top of this letter. If you have any

questions, please contact [REDACTED], who is assigned to investigate this complaint and can be reached by e-mail at [REDACTED].

Sincerely,

/s/

Paul Easton  
Supervisory General Attorney