



Testimony of FPWA

**Presented to:
Committee on Civil and Human Rights
Preliminary Budget Hearing – Civil and Human Rights
Hon. Chair Nantasha Williams
March 7, 2025**

**Jennifer Jones Austin
Executive Director/CEO**

**Prepared By:
Funmi Akinnawonu, Senior Policy Analyst**

40 Broad Street, 5th Floor
New York, New York 10004
Phone: (212) 777-4800
Fax: (212) 414-1328

We are grateful to Chair Nantasha Williams and the New York City Council Committee on Civil and Human Rights for holding this hearing concerning the Preliminary Budget for the New York City Commission on Human Rights (CCHR), and for the opportunity to provide written comments on behalf of FPWA (Federation of Protestant Welfare Agencies).

FPWA is an anti-poverty policy and advocacy organization committed to advancing economic opportunity, justice, and upward mobility for New Yorkers with low incomes. Since 1922, FPWA has driven groundbreaking policy reforms to better serve those in need. We work to dismantle the systemic barriers that impede economic security and well-being, and strengthen the capacity of human services agencies and faith organizations so New Yorkers with lower incomes can thrive and live with dignity.

In addition to our capacity as advocates for economic opportunity and security, we are here today as members of the Human Rights Law Working Group, a coalition of legal service providers and advocacy organizations who advocate in support of a well-funded and sufficiently staffed CCHR. The New York City Human Rights Law (NYCHRL), administered by CCHR, prohibits discrimination in employment, housing, and public accommodations, and protects against discriminatory lending practices, retaliation, discriminatory harassment, and bias-based profiling by law enforcement. It is one of the most comprehensive civil rights laws in the country and applies to a long list of protected classes beyond those recognized by the federal and New York State governments.¹ We commend City Council for its expansive view of civil and human rights, amending the NYCHRL over 40 times since 2013 to add additional protections for New Yorkers.² However, we must express our alarm at the chronic underfunding of CCHR, which prevents New Yorkers from receiving justice when faced with discrimination.

Creating a More Responsive and Better Resourced CCHR

We ask that City Council allocate **at least \$21 million** to bring CCHR funding back above pre-pandemic levels and give CCHR the resources necessary to work through its caseload to decide cases on the merits, including through a robust mediation process, prepare for the possibility of an influx of cases due to the changes at the federal level, and put resources towards educating the public about their rights and the work of CCHR.

Last year CCHR received approximately \$11.5 million in actual expenditures and transfers.³ In the years immediately prior to the pandemic, CCHR's budget peaked at \$14 million, which adjusted for inflation is approximately \$16.2 million today. This funding was clearly not sufficient before the pandemic, and City government has failed to allocate this level of funding since. With that amount of funding CCHR was administratively closing 51% of the cases it closed in FY20, 60% in FY19, 68% in FY18, 65% in FY17, and 62% in FY16.⁴ CCHR should also be staffed to address at least 10% of its cases through mediation to reduce the waiting times for complainants with viable claims. We believe the increase in both funding and mediation capacity is necessary to protect the civil rights of New Yorkers.

¹ <https://www.nyc.gov/site/cchr/law/the-law.page>

²

<https://www.nyc.gov/site/cchr/law/amendments.page#:~:text=A%20Local%20Law%20to%20amend,%2C%20housing%2C%20and%20public%20accommodations>

³ <https://comptroller.nyc.gov/wp-content/uploads/documents/ACFR-2024.pdf>

⁴ <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2020/cchr.pdf>

We also need greater transparency in reporting, so that we may better understand how many cases are being rolled over from year to year, the types of inquiries CCHR is getting that don't result in an open case, and why. This type of information will help both City government and advocates keep CCHR accountable to New Yorkers.

Given not only the importance of CCHR's work, but the urgency created by the changed federal landscape, we also ask that CCHR be exempt from the Program to Eliminate the Gaps (PEGs). Alternatively, we ask that as a public safety agency, that CCHR be exempt from PEGs that exempt other public safety agencies such as NYPD. In an effort to increase staffing levels and address its mandate, we ask that CCHR be exempt from the allotment process (sometimes referred to as 2 for 1), which hampers the agency's ability to efficiently hire.

In addition to funding for Personal Services (PS), we believe it is also crucial that CCHR increase its Other Than Personal Services (OTPS) spending to fund expenditures such as public information campaigns and administrative costs, and support CCHR staff's efforts to implement the laws under their purview. However, given their current limited budget it is impossible for them to do so effectively and thus will require new funding to fulfill this crucial mission.

In recognition of the need to protect the civil rights of New Yorkers, City Council has enacted several laws in recent years which require additional expenditure based on their fiscal impact statements. For example, implementation of the Fair Chance for Housing Act, including the hiring of ten new staff and related costs for a public education campaign at CCHR required \$700,000 in FY25, \$1.4 million for full implementation in FY26, and a total on-going annual cost of \$1.4 million.⁵

For these reasons, we think it is essential the City Council increase funding for CCHR to \$21 million.

The Administration of Anti-Discrimination Employment Laws is Necessary to Protect Economic Security

Discrimination leads to low wages. The less power employees have in the workplace, the less they can push back against inadequate wages, including by leaving for other jobs. Unfortunately, New Yorkers face discrimination based on race, gender, age, disability, sexual orientation and the many other protected classes that are recognized by the NYCHRL.⁶ Discrimination in the workforce, which prevents qualified New Yorkers from getting jobs or promotions, receiving a fair wage, and enjoying a safe work environment that both meets safety standards and is free of harassment, is an economic security issue. Employment discrimination is costly⁷ to workers. It undermines career trajectories due to lack of promotions, loss of wages, job turnover, and the adverse physical and mental health outcomes associated with employment discrimination. It leads workers, particularly minorities and women, to be crowded into, and therefore disproportionately represented in, low-wage jobs creating and perpetuating the harmful effects of

⁵ <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5755059&GUID=1081D9A0-5626-4DE4-BB6A-142AB373A4AF&Options=ID%7CText%7C&Search=Int+632>

⁶ <https://www.nyc.gov/site/cchr/law/the-law.page>

⁷ <https://equitablegrowth.org/the-importance-of-anti-discrimination-enforcement-for-a-fair-and-equitable-u-s-labor-market-and-broadly-shared-economic-growth/#:~:text=The%20effective%20enforcement%20of%20anti%2Ddiscrimination%20laws%20is%20essential%20to,affects%20workers'%20labor%20market%20outcomes.>

occupational segregation.⁸ Within labor sectors it creates and perpetuates wage gaps, as seen by the disparity in average wages for similarly employed individuals based on race or gender, and the stagnation of wages often experienced by women after motherhood, while men often receive a “fatherhood wage premium” or increase in pay.⁹ Discrimination at work has been linked to poor physical¹⁰ and mental health¹¹ outcomes such as depression and high blood pressure. The combination of these harms also prevents workers from building the wealth necessary to be financially secure today, save for the future, and address an unexpected crisis due to the impact on wages and physical and mental health. Addressing discrimination is also burdensome, particularly on low-wealth households due to the time-consuming process of addressing these issues legally or searching for a new job, and the expense of switching jobs including potential moving costs and loss of healthcare coverage both for employees and the dependents in their households.

Currently, FPWA is engaged in on-going research and advocacy concerning the impacts of discriminatory workplace behaviors on the lives of New Yorkers, including occupational segregation (overrepresentation and underrepresentation of specific demographics in labor sectors), wage deprivation (intersecting wage-related harms such as wage suppression, wage theft, and the perpetuation of wage gaps), and job quality (including access to benefits, scheduling, and workplace safety, among other features of employment). From this work, we see that structural inequities in our labor market, spurred by discrimination, ultimately prevent economic mobility, and prevent families from building enough household wealth to not only address their basic immediate needs, but also address their future needs like retirement.

Ultimately, structural inequalities fortify wealth disparities so rigidly that low-wealth workers (including both low- and middle-income workers) have become the majority around the country and in New York State. Without the ability to build wealth, families will continue to struggle. The National True Cost of Living Coalition, co-chaired by FPWA, released a report measuring the True Cost of Economic Security, which indicated that 52% of Americans report not having the resources to cover more than their basic needs. In New York State the figure is 54%, and 62% in New York City.¹² Addressing discrimination in the workforce mitigates this wealth disparity and drives economic security for New Yorkers. We are thankful that CCHR provides redress for those experiencing discrimination in employment, but the understaffing and underfunding of CCHR hampers its impact on economic insecurity.

Underfunding CCHR Undermines City Government Priorities and Services

Effective enforcement of the NYCHRL is key to advancing many of the City’s priorities including housing affordability, and workforce development; however, this requires a well-funded CCHR that has the capacity to take on these cases.

⁸ <https://www.americanprogress.org/article/playbook-for-the-advancement-of-women-in-the-economy/ending-discrimination-and-harassment-at-work/>

⁹ <https://www.pewresearch.org/social-trends/2023/03/01/the-enduring-grip-of-the-gender-pay-gap/>

¹⁰ <https://www.health.harvard.edu/blog/discrimination-at-work-is-linked-to-high-blood-pressure-202305302939>

¹¹

[https://pmc.ncbi.nlm.nih.gov/articles/PMC6864381/#:~:text=Discrimination%20was%20significantly%20associated%20with,13\).](https://pmc.ncbi.nlm.nih.gov/articles/PMC6864381/#:~:text=Discrimination%20was%20significantly%20associated%20with,13).)

¹²

<https://static1.squarespace.com/static/66325d16fd47e929f648f037/t/673c6aed5ba1961190dbe659/1732012781586/Measuring-the-True-Cost-of-Economic-Security.pdf>

New York City's housing affordability and capacity crises¹³ are made worse by source-of-income discrimination¹⁴, when lenders and brokers refuse to rent to low-income New Yorkers because they are using housing subsidies to pay rent. The prevalence of this discriminatory practice is not only an injustice against the individuals and families who struggle to find permanent housing due to source-of-income discrimination, but also an administrative issue for New York City, through the undermining of the housing voucher and subsidy programs, and the follow-on effect of exacerbating homelessness and putting additional strain on the shelter system.¹⁵ Further, CCHR is responsible for enforcing many laws barring discrimination in renting and housing, including the Fair Chance for Housing Act prohibiting discrimination against renters and buyers with criminal histories. It's estimated that 750,000 New York City residents have criminal convictions and could be impacted by the passage of this law, which took effect on January 1st of 2025.¹⁶ Housing discrimination can undermine both the budgetary investment that New York City government has made to increase affordable housing, as well as the administration of the City's services for low-income New Yorkers to drive housing security. Housing security is an economic security issue. Stable housing is a foundational requirement for individuals and families to thrive. Housing security is tied to economic security because housing costs account for a significant amount of household spending. In 2021, over 1 million households (53 percent) in the City were rent burdened, spending over 30 percent of income on rent. Approximately 60 percent of this group was considered severely rent burdened, meaning they spent over 50 percent of their income on rent.¹⁷ This forces households to make trade-offs with other essentials, like food and health care, or leads to living in crowded, poorly maintained or even hazardous conditions and having a negative impact on economic security and health outcomes.¹⁸ CCHR has the infrastructure to protect New Yorkers from housing discrimination, but without sufficient funding and staffing, those tools cannot be put to proper use. New York City's workforce development programs¹⁹ and initiatives are undermined by the pervasiveness of employment discrimination. Right now, job seekers across the country are struggling to find permanent positions, with 20% of job seekers who were looking for employment in 2024, still looking as of 2025, and many reporting that they are applying for more jobs than ever and hearing back less.²⁰ This puts workers facing discrimination in a more vulnerable position, because they may be more afraid to speak out due to fears that if they are retaliated against and fired, that they will not be able to find a new job. Among its many protections NYCHRL protects workers against discriminatory practices such as sexual harassment, retaliation, lack of disability accommodations, or not providing a place and time for lactating employees to pump breast milk. Female employees, workers of color, and LGBTQIA employees, are some of the groups most vulnerable to these insidious and illegal practices. They are also groups with lower labor force

¹³ <https://www.nytimes.com/2024/11/12/nyregion/housing-crunch-affordable-housing.html>

¹⁴ <https://www.nyc.gov/site/cchr/media/source-of-income.page>

¹⁵ <https://www.nytimes.com/2022/05/25/nyregion/ny-vouchers-homeless-discrimination.html>

¹⁶ <https://www.nytimes.com/2022/08/09/nyregion/criminal-background-checks-nyc-housing.html>

¹⁷ <https://www.osc.ny.gov/files/reports/osdc/pdf/report-17-2024.pdf>

¹⁸ <https://www.osc.ny.gov/reports/new-yorkers-need-housing-insecurity-crisis>

¹⁹ <https://www.nyc.gov/site/wkdev/recent-initiatives/recent-initiatives.page>

²⁰ <https://www.newsweek.com/americans-are-struggling-find-new-jobs-market-changes-2021742>

participation²¹ and therefore most likely to be targeted by the City's workforce development programs. Providing training and education may prove to ultimately be meaningless if these workers are not hired, promoted, or unfairly disciplined because of illegal discrimination.

City Council recently introduced anti-discrimination bills, that if passed will require additional funding to CCHR based on the fiscal impact statements prepared by the New York City Mayor's Office of Management and Budget (OMB). For example, Intro 1064-2024 requires transparency concerning promotional opportunities, which would require employers to make reasonable efforts to notify their current employees of job opportunities prior to selecting a candidate for the role thus reducing the opportunity to ignore qualified long-term employees, which often exacerbates racial and gender divides. If passed CCHR would require \$431,348 during FY26 and \$281,348 for successive years to carry out and enforce the provisions of this legislation.²² Intro 0808-2024, concerning information required in job listings, was designed by Council to make hiring in the City fairer and more transparent and to ensure that all candidates were offered the best possible salary and options when interviewing for a position irrespective of any protected classes. Based on the fiscal impact statement for this bill, CCHR would require \$556,348 to implement year one and \$406,348 for successive years.²³ Intro 0984-2024 aims to study pay and employment equity for private employees. While the Office of Data Analytics (MODA), would lead this work they would require the coordination of CCHR and the Department of Consumer and Worker Protection (DCWP). Based on the fiscal impact statement for this bill, CCHR would require Personal Services funding of \$310,000 to hire staff that work to ensure pay and workplace equity year after year.²⁴ These bills contain important protections for workers, and we urge City Council to pass them during this session. However, City Council must also increase CCHR's funding to support the implementation of these laws.

New York City job seekers and employees, including those participating in priority training and workforce readiness programs, rely on CCHR's "Know Your Rights" outreach to educate them. However, more critically they should be able to rely on CCHR to address their discrimination claims in a timely manner. Unfortunately, CCHR adjudications are not timely, and during FY24, CCHR had an "average age of complaint closed" of 593 days, up from 515 days in FY20 and a 5-year low of 427 days in FY21.²⁵ New Yorkers cannot afford to wait over a year for justice when their housing, employment, wages, or ability to participate freely in society, are at stake. By not effectively staffing and resourcing CCHR, the City does a disservice to all employees, but those who are already most vulnerable will bear the brunt of the agency's lackluster performance due to its lack of resources.

²¹ <https://www.osc.ny.gov/reports/osdc/new-york-citys-uneven-recovery-mothers-workforce#:~:text=Child%20care%20issues%20may%20have,raises%20for%20women%20of%20color.&text=While%20self%20employment%20can%20provide,benefits%20such%20as%20health%20insurance.;>
<https://nysdolreports.com/2023-tgncnb/>

²² <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6874684&GUID=4A2C4F0E-AA05-4867-90B6-7B4168CCA348&Options=&Search=>

²³ <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6639655&GUID=F37F7F06-33EE-4DC9-AA50-86B6D4DD220A&Options=&Search=>

²⁴ <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6788474&GUID=4100A3E1-33A0-4CC7-B431-E27984179902&Options=&Search=>

²⁵ <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf>

The City should be lauded for prioritizing addressing New York's ongoing housing crisis and compounding employment inequities. However, by not fully resourcing a critical tool in its arsenal, it countermands its own initiatives. The NYCHRL is not simply a pledge for the City to be more equitable; it is a law that should be enforced with the full weight of the government behind it. Leaving workers and tenants exposed to the whims of discriminatory actors in the housing and employment space will not only impede the City's goals of equity but undermine the resources it invests in these crucial areas.

CCHR's Enforcement Capacity is Limited by Its Underfunding and Understaffing

CCHR has a law enforcement function in a civil context, that parallels that of the district attorney's office in a criminal context serving both a prosecutorial and punitive role through initiating matters and handing down punishment. However, it has a fraction of the funding of the DA, which limits the agency staff's capacity. At its best, law enforcement should create a sense of safety within communities. CCHR has the infrastructure necessary to grant that safety in housing, employment, and general life to New Yorkers, but that is meaningless if it's not backed by sufficient resources to power its enforcement capacity.

CCHR has the power to investigate complaints, settle cases, and refer cases to the New York City Office of Administrative Trial and Hearing (OATH) for resolution. It also has the authority to assess fines, obtain monetary damages, and negotiate additional remedies including rehiring, policy change, training, and modifications for accessibility.²⁶ CCHR plays an important role in mediating reasonable accommodation requests. Under the NYCHRL employers are required to engage in "cooperative dialogue" with employees who make reasonable accommodation requests, and CCHR can mediate these matters in the settlement process.²⁷ However, the capacity issues within CCHR are leaving New Yorkers with potentially viable discrimination claims without a forum to address them, due to the backlog in cases. In FY24 CCHR administratively closed 40% of the 447 cases that it closed that year or approximately 179 cases. While this percentage is down from a 5-year high of 56% in FY22, the high rate of administrative closures means that CCHR staff initiated some cases, because they determined there may be a viable claim, but failed to decide if the cases should be dismissed or referred, or CCHR staff were unable to settle those cases.²⁸ Consequently, these 179 cases were shelved without being decided on the merits. If New Yorkers must wait for years to have their discrimination cases reviewed, only to have them administratively closed, they don't have adequate protection from discrimination.²⁹ When it comes to discrimination CCHR is the administrator of justice, but City government has not funded or staffed this agency sufficiently to meet that mandate. Consequently, New Yorkers are living in an acute state of lawlessness concerning discrimination, because their enforcement agency is under-resourced.

CCHR's settlement capacity is also limited by the agency only employing one mediator. Mediation often speeds up settlement, but the limited capacity of CCHR due to having a single mediator, and limitation that *pro se* litigants, those who are unrepresented, do not have access to CCHR's mediation, contributes to CCHR's backlog of cases. These problems undermine the deterrent effect of having a watchdog agency with the power to enforce penalties against those who violate the NYCHRL, because failing to sufficiently fund CCHR cuts the teeth of the agency. It also wastes the efforts of City Council to continuously amend the NYCHRL and expand civil rights to New Yorkers, because CCHR's responsibilities continue to expand

²⁶ <https://www.nyc.gov/site/cchr/enforcement/2024-settlements.page>

²⁷ <https://www.nyc.gov/site/cchr/law/chapter-1.page>

²⁸ <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf>

²⁹ <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf>

without sufficient staff and funding to carry out the work. In FY24 CCHR administratively closed approximately 6X more cases (179) than it mediated (31).³⁰ The need for a sufficiently staffed and funded CCHR is also about creating proactive enforcement, to keep the caseload and backlog down through both deterrence and timely enforcement of the NYCHRL. Without sufficient funding and staffing CCHR does not have the capacity to enforce these laws, leaving New Yorkers without essential protection.

While it is clear that CCHR is underfunded and understaffed, it can be difficult to gauge the extent of the problem due to gaps in reporting. In FY24, CCHR received 13,360 inquiries up from 10,015 in FY20 and a 5-year low of 9,055 in FY21, and it initiated 868 matters, down from 1,307 in FY20. CCHR also reported having 1,206 open matters in FY24, down from 2,398 in FY20 and a 5-year high of 2,411 in FY21.³¹ While there could be several reasons why the number of matters initiated by CCHR has plummeted, including an attempt to address the backlog of open matters, the reporting from the agency is insufficient to draw a clear picture. There is a need for greater transparency in reporting, because it is not clear how many of CCHR's cases are held over from year to year. A worker experiencing discrimination at their job does not have years to wait for relief.

CCHR also needs funding to dedicate staff to publicizing its work and offering policy positions within its guidance. This policy guidance would clarify how the NYCHRL will be applied by CCHR and create a deterrent effect for those looking to discriminate against New Yorkers, while also educating New Yorkers about their rights.

CCHR's Limited Capacity Leaves New Yorkers without Justice

We are in the middle of a crisis, and New York City government must act with the urgency of the last line of defense against discrimination in a context where federal anti-discrimination law and policy can no longer be relied upon.

The work of CCHR is even more vital during the second Trump administration and the changes to the U.S. Equal Employment Opportunity Commission (EEOC), which is tasked at the federal level with protecting workers against discrimination. During the first Trump Administration, the Department of Justice (DOJ) took opposing stances from EEOC on several workplace discrimination issues, pushing back on a shift towards underenforcement of anti-discrimination law, including a federal case concerning whether gender identity is covered under Title VII of the 1964 Civil Rights Act, and DOJ indicating it would not enforce EEOC's guidance concerning discrimination on the basis of criminal history.³² This time the DOJ and EEOC are in lockstep, rolling back LGBTQIA+ protections, and DEI initiatives.³³

CCHR likely will have to take up additional cases because of the Trump administration's gutting of the enforcement of civil rights law through the U.S. Department of Education (DOE) Office for Civil Rights (OCR). OCR is responsible for enforcing federal civil rights laws in schools and other recipients of DOE

³⁰ <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf>

³¹ <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf>

³² <https://news.bloomberglaw.com/daily-labor-report/biden-era-workplace-bias-policies-under-threat-with-trump-doj>

³³ <https://news.bloomberglaw.com/daily-labor-report/trumps-return-upends-eeocs-enforcement-agenda-at-record-speed>; <https://www.nbcnews.com/politics/justice-department/trump-reversing-justice-departments-civil-rights-policies-rcna189657>

funding throughout the nation.³⁴ They are responsible for enforcing several federal laws in a school context including discrimination on the basis of race, color, and national origin under Title VI of the Civil Rights Act of 1964, sex discrimination under Title IX of the Education Amendments of 1972, discrimination on the basis of disability under Section 504 of the Rehabilitation Act of 1973, and age discrimination under the Age Discrimination Act of 1975.³⁵

The Trump administration has expressed a desire to abolish the DOE³⁶, and OCR appears to be lessening its caseload. In the first three and a half weeks of the Trump administration, OCR opened 20 new investigations, compared to the 110 new investigations opened in the first three weeks of the Biden administration, and the more than 250 new cases opened during the same period last year. OCR has also shifted to “directed investigation” initiated by the Trump administration, instead of complaints filed by students and their families. It has also been reported that OCR staff have been instructed not to communicate with the students, families and schools involved in cases launched in previous administrations and to cancel scheduled meetings and mediations.³⁷ The NYCHRL applies to students³⁸ attending schools and universities in New York City. Without OCR as a resource, CCHR must be sufficiently funded to protect New York City’s students from discrimination.

To be clear, the work of CCHR has always been urgent, not only because anti-discrimination work is essential for all the reasons mentioned in this testimony, but also because there are protections that New York City residents enjoy that don’t exist on the State or federal level. However, the urgency has obviously increased under a federal administration that is dismantling decades of anti-discrimination law.³⁹ New Yorkers cannot afford a budget issue to stand between them and possibly their only forum for asserting many of their civil rights. City government must be accountable to its constituents. In this moment, recognizing a potential increased need for the services of CCHR, City government must act to increase funding.

Thank you for the opportunity to submit testimony to this hearing. At FFWA we are invested in advancing justice for those who face discrimination in New York City. CCHR serves an important role in the protection of civil rights of New Yorkers. We look forward to continuing to work with the City Council to champion increased funding and staffing for this vital agency.

³⁴ <https://www.ed.gov/about/ed-offices/ocr>

³⁵ <https://www.ed.gov/about/ed-offices/ocr/about-ocr#:~:text=The%20Office%20for%20Civil%20Rights%20enforces%20several,financial%20assistance%20from%20the%20Department%20of%20Education.&text=A%20complaint%20of%20discrimination%20can%20be%20filed,olor%2C%20national%20origin%2C%20sex%2C%20disability%2C%20or%20age.>

³⁶ <https://www.nbcnews.com/politics/trump-administration/states-brace-trump-plan-dismantle-education-department-rcna192953>

³⁷ <https://www.propublica.org/article/departement-of-education-civil-rights-office-investigations>

³⁸ https://www.nyc.gov/assets/cchr/downloads/pdf/materials/NYCStudents_KYR2024.pdf

³⁹ <https://www.axios.com/2025/01/22/trump-dei-lbj-rollback>