



September 30, 2025

U.S. Department of Education
Office of the General Counsel
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Deputy General Counsel and Department Leadership,

This is a federal Civil Rights complaint filed under the U.S. Department of Education's Office for Civil Rights ("OCR") Complaint Resolution Process against Colorado State University (CSU) located at 711 Oval Drive, Fort Collins, CO 80521.

[Fair For All](https://www.fairforall.org) (FAIR) is a nonpartisan, nonprofit organization dedicated to advancing civil rights and liberties, and promoting a common culture grounded in fairness, understanding, and humanity. FAIR alleges that Colorado State University, a public institution receiving federal financial assistance, violated Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972 by intentionally discriminating based on race and sex through its implementation of discriminatory pedagogical practices in social work courses.

Basis of the complaint

On July 2025, Dr. Quinn Hafen, PhD (University of Wyoming), and Ms. Marie Villescas (Colorado State University instructor) published the article "Exposing and Disarming Whitelash to Advance Anti-Racism: A Collaborative Autoethnography on Interracial Co-teaching" in the Journal of the Society for Social Work and Research.¹² The since withdrawn study documented their experiences co-teaching undergraduate social work courses at Colorado State University (CSU) in Spring 2023 (a 3rd-year BSW practice course) and Fall 2023 (a first-year general education seminar open to freshmen and transfers), where they applied "interracial teaching partnerships" and a "pedagogy of discomfort" to challenge white supremacy.

In these courses, the instructors deliberately induced emotional discomfort, shame, and guilt in white

¹Quinn Hafen & Marie Villescas, *Exposing and Disarming Whitelash to Advance Anti-Racism: A Collaborative Autoethnography on Interracial Co-teaching*, 19 J. Soc'y for Soc. Work & Rsch. (forthcoming 2025) (accepted June 30, 2025; withdrawn Aug. 22, 2025), <https://doi.org/10.1086/737471>. The paper is written in a narrative fashion in which only "Author 1" and "Author 2" are identified. The identity of the authors are as follows: Author 1 (Quinn Hafen) and Author 2 (Marie Villescas).

² Copy of the withdrawn study is attached.

students through lessons on "white fragility" and social work's role in perpetuating whiteness, refusing to alleviate it and interpreting student resistance as "whitelash" to restore white comfort. This approach created a hostile learning environment, with white students reporting feeling unsafe and judged, some of whom stopped participating, and course evaluations reflected emotional distress, including one stating, "I don't feel safe in this classroom. The judgement and rejection come from the teachers' reactions rather than students. This makes me shut down" (p. 23). The study analyzed 10 recorded processing sessions on student feedback, framing the emotional responses of White students (e.g., sadness, guilt, anger, shame) as racialized power dynamics that protect white supremacy, while prioritizing the experiences of Black Indigenous and Persons of Color (BIPOC).

On August 8, 2025, The College Fix reported on the article, noting critics' claims that the methods were abusive and targeted white and male students based on immutable identities.³ The study was removed from the journal's website on August 22, 2025.

Worst quotes from the study include: (**emphasis added in bold**)

- "When **white students** felt uncomfortable—i.e., sad, guilty, angry, ashamed—they lashed out in an effort to re-establish white comfort." (Abstract)
- "We reflected that students in 'both classes started to pushback when they're first starting to feel the shame' (Author 2)... In our processing sessions, we discussed how white students attempted to derail the class from content about racism and white supremacy, instead seeking to center the entire class's attention on ensuring their own white comfort. When we doubled down and set a firm boundary that **we would not defer to white emotional comfort**, we reflected that these students lashed out in an attempt to relieve negative emotions and ease feelings of shame and guilt." (p. 20).
- "In reflecting on the racially specific responses to discomfort, we reaffirmed that "[we] want the tension, **[we] want the discomfort among people who hold privilege**" (Author 2)." (p. 26)
- "We observed that students who lashed out behaved as if they were "a mini mob" (Author 2) engaged in "groupthink" (Author 1). In our experiences, one student engaging in whitelash "leads the way for the whole class" (Author 1). For example, reflecting on the interaction in Case Example 1, Author 1 noted that, "this student has been acting as a spokesperson for other folks that he says talk to him about their concerns... he's thinking that he's doing everyone a favor." But "he's at the center of the **whiteness and the maleness**" (Author 2)." (p. 24)
- It's really interesting how this very bright, very intuitive person of color had assumed those things about me and my approach. But yet the **white dudes** in the class were attributing oppression and all kinds of nastiness to me. [Laughs]. (p. 29).

An addendum attached below provides additional quotes from the paper which show discriminatory teaching methods.

While the study concluded at the end of the Spring 2023 term, Ms. Marie Villescas Zamzow continues

³ Daniel Nuccio, 'Whitelash': Professors Say White Students Get Angry, Frustrated by 'Anti-Racist Education', The College Fix (Aug. 8, 2025), <https://www.thecollegefix.com/whitelash-professors-say-white-students-get-angry-frustrated-by-anti-racist-education/>.

teaching at Colorado State University and is currently listed as Faculty and Staff.⁴

Statute of Limitations

The statute of limitations for filing a complaint with the Office for Civil Rights (OCR) is 180 days from the last act of discrimination, as outlined in the OCR Case Processing Manual (Section 106).⁵ However, Section 107 of the manual provides an exception where “The complainant could not reasonably be expected to know the act was discriminatory within the 180-day period, and the complaint allegation was filed within 60 days after the complainant could.”⁶

The withdrawn paper describes conduct which occurred in the Spring/Fall 2023 courses, which is outside of the 180-day window for filing a complaint. However, FAIR only learned of this case on August 8, 2025, when The College Fix reported on the publication. Before this date, FAIR could not have reasonably been expected to know that the discriminatory practices at Colorado State University were occurring because it was not publicly known. Accordingly, FAIR filed this complaint on September 30, which falls within the 60-day period.

Furthermore, even if the initial acts fall outside this period, Ms. Marie Villescas currently teaches at Colorado State University,⁷ and we have reason to believe she continues these discriminatory practices. Villescas’ discriminatory practices and methods were not just part of her study but teaching approaches she was proud enough to publish, suggesting no reason to assume she has abandoned such practices.

Relevant Law

Title VI of the Civil Rights Act prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance. Title VI provides:

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.
42 U.S.C. § 2000d

Meanwhile, Title IX of the Education Amendments of 1972 prohibits discrimination based on sex in any education program receiving federal financial assistance. Title IX provides:

⁴ Marie Villescas-Zamzow, *Faculty Profile*, Colo. State U. Coll. Health & Hum. Scis., <https://www.chhs.colostate.edu/bio-page/marie%20villescas-zamzow-2238/> (last visited Sept. 26, 2025).

⁵ U.S. Dep’t of Educ., Off. for C.R., *Case Processing Manual* (Feb. 19, 2025), <https://www.ed.gov/media/document/ocr-case-processing-manual-us-department-of-education-office-civil-rights-33891.pdf>.

⁶ *Ibid.*

⁷ *Colo. St. U. Online, Master of Social Work*, <https://www.online.colostate.edu/degrees/social-work/> (last visited Sept. 29, 2025).

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. (20 U.S.C. § 1681(a))

As a public institution receiving federal funding, Colorado State University is bound by Title VI and Title IX. *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181 (2023); see *Cannon v. Univ. of Chi.*, 441 U.S. 677 (1979).

Furthermore, the Supreme Court in *Davis v. Monroe County Bd. of Ed.*, 526 U.S. 629 (1999), established that a recipient of federal funds may be liable for a hostile learning environment under Title IX when it is deliberately indifferent to harassment that is “so severe, pervasive, and objectively offensive” that it deprives victims of access to educational opportunities or benefits. Federal courts, including the 10th Circuit, which covers Colorado, have applied this standard to Title VI claims. See *Bryant v. Independent School District No. 1-38*, 334 F.3d 928, 934 (10th Cir. 2003) (holding that a school’s deliberate indifference to severe and pervasive racial harassment, such as racial slurs and physical intimidation, violated Title VI).

Ms. Villescás and Dr. Hafen’s conduct constituted race-based discrimination under Title VI and sex-based discrimination under Title IX by targeting white and male students for emotional distress in Spring and Fall 2023 social work courses, as admitted in their article, which states, “we want the discomfort among people who hold privilege” (p. 26), labels white students’ resistance as “whitelash” (Abstract, p. 20), and critiques a student for “whiteness and maleness” (p. 24). Course evaluations confirm students felt “unsafe” and “judged” (p. 23).

Ms. Villescás and Dr. Hafen’s conduct was severe, pervasive, and objectively offensive under Title VI and Title IX. It was severe because the instructors intentionally induced “shame and guilt” in white and male students, targeting one for “whiteness and maleness” (p. 24), causing emotional distress so intense that students reported feeling “judged” (p. 23). It was pervasive because this shaming spanned Spring and Fall 2023 courses, with 10 recorded sessions showing consistent targeting (p. 23), conduct which we believe is continuing in Ms. Villescás’ current classes. Lastly, it was objectively offensive because shaming students for their race and sex creates an intimidating environment that unfairly subjects Americans to discrimination based on immutable characteristics.

The hostile environment created by Ms. Villescás and Dr. Hafen significantly deprived white and male students of educational opportunities at CSU, violating Title VI and Title IX, because it caused them to feel “unsafe” and “judged,” undermining their ability to learn. Course evaluations show students made statements such as, “I don’t feel safe in this classroom. The judgement and rejection come from the teachers’ reactions. This makes me shut down” (p. 23), after the instructors targeted for “whiteness and maleness” (p. 24) which deterred participation.

Deliberate indifference under Title VI and Title IX occurs when an institution with notice responds unreasonably, per *Davis*, 526 U.S. 629, 650 (1999). Unlike typical peer-harassment cases, Ms. Villescás and Dr. Hafen, as CSU agents, directly created a hostile environment by inducing “shame and guilt” in white and male students (p. 26) and targeting “whiteness and maleness” (p. 24). They willfully ignored

feedback, laughing at student distress (p. 29), while evaluations reported students felt “unsafe” (p. 23). CSU’s retention of Villescas after the article was published and withdrawn further shows institutional indifference as the practices in which Villescas engaged are likely occurring to this day since Ms. Villescas continues to teach.

In conclusion, Ms. Villescas and Dr. Hafen’s actions, as detailed in their withdrawn paper, demonstrate CSU’s violation of Title VI and Title IX by fostering a hostile learning environment through severe, pervasive, and offensive targeting of white and male students, compounded by institutional indifference.

Specific Allegations

1. Race- and Sex-Based Discrimination in Pedagogical Practices:

In Spring and Fall 2023, CSU instructors Ms. Marie Villescas and Quinn Hafen implemented a "pedagogy of discomfort" in social work courses, targeting white and male students with lessons on "white fragility" and "whitelash" to induce shame and guilt, as admitted in their July 2025 article (p. 20, 24, 26). This violated Title VI (race) and Title IX (sex) by creating a discriminatory learning environment.

2. Hostile Learning Environment:

The instructors’ actions were severe, pervasive, and objectively offensive per *Davis*, 526 U.S. 629 (1999); *Bryant*, 1-38, 334 F.3d 928, 934 (10th Cir. 2003). They intentionally shamed white and male students (p. 24, 26), causing distress so severe that students felt “unsafe” and “judged” (p. 23). This persisted across two semesters (p. 23) and was offensive by dismissing student feedback with laughter (p. 29), depriving students of educational opportunities.

3. Deliberate Indifference by CSU:

CSU was deliberately indifferent under *Davis*, 526 U.S. 629, 650 (1999), as instructors, acting as CSU agents, directly created the hostile environment and ignored student feedback (p. 23, 29). CSU’s retention of Villescas, who likely continues these practices, shows institutional failure to address the discrimination.

Harm Caused

In Spring and Fall 2023, CSU instructors Ms. Marie Villescas and Quinn Hafen’s “pedagogy of discomfort” targeted white and male students with shame-inducing lessons on “white fragility” and “whitelash” (p. 20, 24, 26), creating a hostile learning environment. Students reported feeling “unsafe” and judged,” with one stating, “I don’t feel safe in this classroom... This makes me shut down” (p. 23). This violated Title VI and Title IX by denying equal educational access. CSU’s indifference, shown by retaining Villescas and ignoring feedback (p. 29), worsened the harm.

Requested Remedies

To address the discriminatory practices and hostile learning environment created by CSU’s instructors and ensure compliance with Title VI and Title IX, FAIR respectfully requests the following from the U.S. Department of Education’s Office for Civil Rights:

1. **Policy Revision:** Direct CSU to revise its pedagogical policies to eliminate race- and sex-based practices, such as the "pedagogy of discomfort" that targets white and male students to ensure all teaching methods comply with federal anti-discrimination laws.
2. **Disciplinary Action:** Require CSU to investigate and take appropriate disciplinary action against Marie Villegas and any faculty continuing discriminatory teaching practices.
3. **Compliance Monitoring:** Mandate CSU to implement oversight mechanisms, including regular reports to the OCR, to ensure federally funded programs comply with Title VI and Title IX.
4. **Training Implementation:** Require any responsible CSU agent to undergo mandatory training on Title VI and Title IX to prevent future discriminatory practices in educational programs.

Conclusion

FAIR urges the U.S. Department of Education's Office for Civil Rights to promptly investigate Colorado State University's discriminatory pedagogical practices, as detailed in Ms. Marie Villegas' and Dr. Quinn Hafen's withdrawn paper. By targeting white and male students with a "pedagogy of discomfort" that induced shame and created a hostile learning environment, CSU violated Title VI and Title IX. The university's indifference, evidenced by retaining Villegas and their agent's willful disregard for student distress, demands immediate action. CSU must be held accountable to restore an equitable educational environment free from race- and sex-based discrimination.

Very truly yours,

Monica Harris

Monica Harris

Executive Director

Fair For All

Enclosures:

1. Whitelash Compilation
2. Exposing and Disarming Whitelash... - Withdrawn Paper