

Furthermore:

In addition to the social and cultural messages about race that are transcribed and socialized throughout generations, these issues remain prevalent because of the conflicting message our country has given institutions about race and discrimination in the U.S., as seen by Supreme Court cases like *Milliken v. Bradley* (Khalifa, Douglas, and Chambers, 2016). In 1974, the Supreme Court ruled in *Milliken v. Bradley* on the distinction between de facto segregation and de jure segregation. They upheld that so long as segregation was not explicitly written as a school policy (de jure), and that no clear deliberate action was being taken to segregate schools, then the district was not responsible for desegregating. This ruling virtually nullified the effect of *Brown v. Board* by removing the responsibility of desegregation from the districts and shifting responsibility exactly nowhere. While these changes were meant to address public education at the K-12 level, it set the precedent within higher education that racial segregation was inherently unjust, but it was not the responsibility of any one institution to desegregate. Additionally, these rulings left arguably the most complex battle unanswered and unaddressed, who bore the responsibility to integrate universities. Integration means not just allowing Black students to attend the university but to incorporate students of color into the student body and the culture of the university.

Also in 1965, President Johnson signed an executive action requiring that all government contractors take “affirmative action” to expand job opportunities for minorities, this order is now known simply as “Affirmative Action.” In this same executive order, President Johnson also created the Office of Federal Contract Compliance within the Department of Labor. This office would be responsible for overseeing the execution of the Affirmative Action order. Affirmative Action requirements and regulations have seen significant reform and development since 1965, but the precedent it