

August 6, 2025

The Honorable Harmeet K. Dhillon Assistant Attorney General Civil Rights Division U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, D.C. 20530

Re: Letter in Support of DOJ's Ongoing Investigation Into Harvard's Admissions Practices and Request for Enforcement Action Against Harvard Medical School's Illegal DEI Practices

Dear Assistant Attorney General Dhillon:

America First Legal Foundation ("AFL") is a national, nonprofit organization committed to upholding the rule of law and advancing equal protection of the law for all Americans.

We write in support of the Department of Justice's ("DOJ") ongoing investigation¹ into Harvard University ("Harvard") for potential violations of the Supreme Court's decision in *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College* ("SFFA"),² and to request an immediate investigation and enforcement action against Harvard Medical School for its unlawful rebranding and continuation of discrimination on the basis of race, sex, national origin, ethnicity, and other impermissible, immutable characteristics under the pretext of "diversity, equity, and inclusion" ("DEI") in open defiance of federal civil rights laws, controlling Supreme Court precedent, and Executive Orders issued by President Donald J. Trump.

Once considered the gold standard of American higher education, Harvard today is better known for defying the Constitution than upholding it. Rather than dismantle

¹ Michael C. Bender & Michael S. Schmidt, *Trump Administration Escalates Harvard Feud with New Justice Dept. Investigation*, N.Y. TIMES (May 15, 2025), https://perma.cc/9S3P-MELD.

² 600 U.S. 181 (2023) (hereinafter, "SFFA").

its "discrimination, exclusion, and intolerance" practices as required, Harvard has chosen instead to rename, repackage, and redeploy the same unlawful practices under new euphemisms.⁴ It has chosen defiance over compliance.

Even more concerning is the university's calculated effort to evade the Supreme Court's ruling in *SFFA*⁵—a case where Harvard was named a Defendant. It appears Harvard has adopted the language of compliance while preserving the substance of discrimination within its medical school. Its public commitment to promoting diversity⁶ remains the cornerstone of its "holistic" admissions strategy.⁷ In place of explicit racial classifications, the school now deploys race proxies embedded within holistic review criteria and ideologically driven DEI frameworks—all designed to produce predetermined demographic outcomes. This is not a lawful adaptation. It is covert circumvention to achieve the very racial balancing the Supreme Court struck down as "patently unconstitutional."

The use of DEI-based discrimination in medical education isn't just illegal, it's unethical. No sector demands greater adherence to merit and objectivity than medicine, where decisions made by physicians can mean the difference between life and death. Patients place their lives in the hands of physicians, and the public must be able to rely on a healthcare system where those entrusted with medical care are selected based on objective qualifications such as academic excellence and clinical competence, not identity metrics masquerading as merit. Any healthcare admissions practice that elevates race, sex, or other protected traits over merit undermines the integrity of the profession, the quality of the U.S. physician workforce, and endangers public trust in the medical system itself. The integrity of American medicine cannot be sacrificed to appease ideological orthodoxy.

Accordingly, AFL urges DOJ to expand its investigation into Harvard University to include Harvard Medical School and initiate a formal enforcement action under Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972. We further ask DOJ to coordinate with the Department of Education's Office for Civil

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³ Harmeet K. Dhillon (@AAGDhillon), "Discrimination, Exclusion, and Intolerance," X (July 7, 2025, at 6:00 PM), https://perma.cc/9FWX-4ZZL.

⁴ William C. Mao et al., *Harvard Grad Schools Rebrand Diversity Offices as University Wipes DEI Messaging*, HARV. CRIMSON (July 13, 2025), https://perma.cc/FH89-N5LM.

⁵ Supra note 2.

⁶ Commitment to Diversity, HARV. MED. SCH., https://perma.cc/7KWH-DHV6.

⁷ Selection Factors, HARV. MED. SCH., https://perma.cc/4XDG-99ZA.

⁸ 600 U.S. at 223.

Rights and the Department of Health and Human Services' Office for Civil Rights to enforce all applicable provisions of federal civil rights law, including Section 1557 of the Affordable Care Act.

I. Federal Law Requires the Elimination of Discrimination Based on Race, Sex, Ethnicity, and Other Impermissible Characteristics

As a recipient of federal financial assistance, Harvard is bound by Title VI of the Civil Rights Act of 1964, which unequivocally prohibits discrimination on the basis of "race, color, or national origin" in any program or activity receiving federal funds. Similarly, Title IX of the Education Amendments of 1972 bars discrimination "on the basis of sex" in "any education program or activity" receiving federal funds. Section 1557 of the Affordable Care Act incorporates these protections and applies them squarely to health education institutions, including medical schools. 11

President Trump's recent Executive Orders reaffirm and extend these statutory protections. On January 21, 2025, President Trump signed Executive Order No. 14151, titled "Ending Racial and Wasteful Government DEI Programs and Preferencing," which categorically prohibits the use of any structures, policies, or practices that rely on race, skin color, ethnicity, national origin, or other impermissible, immutable characteristics to guide institutional decision-making. 12

President Trump subsequently issued Executive Order No. 14173, titled "Ending Illegal Discrimination and Restoring Merit-Based Opportunity," rescinding the Biden administration's DEI directives and requiring federal agencies to enforce long-standing civil rights laws uniformly, combat illegal DEI preferences, policies, and programs, and condition federal grants and contracts on certification that recipients, including public institutions like Harvard, do not engage in such discriminatory practices.¹³

These Executive Orders make clear that publicly funded institutions have no lawful basis for maintaining DEI programs. They assign federal agencies the affirmative obligation to withhold funds and pursue enforcement against any institution that engages in unlawful discrimination by conditioning benefits, penalties, or access to

⁹ 42 U.S.C. § 2000d et seq.

¹⁰ 20 U.S.C. § 1681(a).

¹¹ 45 C.F.R. § 92.4.

¹² Exec. Order No. 14151, 90 Fed. Reg. 8339 (Jan. 29, 2025), https://perma.cc/4XZP-KB4S.

 $^{^{13}}$ Exec. Order No. 14173, 90 Fed. Reg. 8633 (Jan. 31, 2025), https://perma.cc/8ASH-GVED.

programs on protected characteristics. That prohibition applies regardless of the terminology used. Whether labeled "DEI" or rebranded under euphemisms such as "inclusive excellence," "institutional equity," "health equity," "cultural humility," or "community engagement," any creative terminology intended to evade or conceal noncompliance with these Executive Orders is patently unlawful. Changing the name does not change the illegality: "this wolf comes as a wolf." ¹⁴

A. Department of Education Has Oversight of Medical School Accreditation

On February 14, 2025, the U.S. Department of Education's OCR issued a Dear Colleague Letter clarifying the nondiscrimination obligations of institutions receiving federal funds under the Equal Protection Clause of the Fourteenth Amendment, Title VI of the Civil Rights Act of 1964, and other applicable federal civil rights laws. ¹⁵ This letter reaffirmed that institutions receiving federal funds may not engage in racial classifications, stereotyping, or preferences in any aspect of their operations. ¹⁶ Accompanying the letter was a Frequently Asked Questions ("FAQ") document explaining how OCR interprets the Supreme Court's decision in *SFFA*¹⁷ in the context of race-based classifications, preferences, and stereotypes prohibited under Title VI. ¹⁸

While several federal courts have issued preliminary injunctions temporarily prohibiting the Department of Education's OCR from enforcing the Dear Colleague Letter and accompanying FAQ,¹⁹ the principles articulated therein are not novel. They rest squarely on controlling Supreme Court precedent and long-standing federal civil rights law. Accordingly, nothing prohibits the Department of Education from taking immediate action consistent with those legal authorities.

The Department of Education plays a significant role in regulating medical schools through oversight of accrediting agencies and federal funding. For example, the Department of Education grants recognition to the Liaison Committee on Medical Education ("LCME"), which oversees the "accreditation of programs of medical

¹⁴ Morrison v. Olson, 487 U.S. 654, 699 (1988) (Scalia, J., dissenting).

Dear Colleague Letter: Students for Fair Admissions v. Harvard and University of North Carolina,
 U.S. DEP'T OF EDUC. (Feb. 14, 2025), https://perma.cc/T4YA-TYFP.
 Id.

¹⁷ Supra note 2.

¹⁸ Frequently Asked Questions About the Prohibition of Racial Preferences and Stereotypes Under Title VI of the Civil Rights Act of 1964, U.S. DEP'T OF EDUC., https://perma.cc/P8C4-QTF3.

¹⁹ Dear Colleague Letter, *supra* note 15.

education leading to the M.D. degree in the United States in institutions that are themselves accredited by regional accrediting organizations."²⁰

The LCME is jointly sponsored by the American Medical Association and the Association of American Medical Colleges ("AAMC").²¹ These entities actively promote DEI-based discrimination in medicine, including the recruitment of underrepresented students, residents, fellows, faculty, and staff.²² The AAMC, in particular, encourages institutions like Harvard to adopt these discriminatory practices.²³ LCME accreditation is a critical prerequisite for medical schools to access federal benefits, including Title VII funding and participation in the United States Medical Licensing Examination.²⁴ This gives the Department of Education not only oversight but significant leverage. Notably, LCME's recognition by the Department is subject to renewal and expires in 2028.²⁵ That recognition and its privileges should accompany a corresponding duty to comply with federal law.

B. HHS Warns Medical Schools That Race-Based Admissions, Even When Disguised, Violate Federal Law

On May 6, 2025, HHS issued its own Dear Colleague Letter directed at medical schools that receive federal financial assistance, warning that racial classifications, stereotyping, or preferences in admissions and training, whether explicit or obscured by DEI euphemisms, violate Title VI of the Civil Rights Act of 1964, Section 1557 of the Affordable Care Act, and the Equal Protection Clause.²⁶ The letter emphasized that discrimination against any racial group, including White, Jewish, and Asian students, is unlawful regardless of the terminology used.²⁷

²⁰ About the LCME, LIAISON COMM. ON MED. EDUC., https://perma.cc/SBR4-2FVM.

 $^{^{21}}$ Id

²² American Medical Association Resident and Fellow Section, AM. MED. ASS'N, https://perma.cc/44V5-F2NT; see also Activism Over Meritocracy: How the Association of American Medical Colleges is Corrupting Medical Education with Endless DEI Ideology, Do No HARM, https://perma.cc/HV3Y-24PN.

 $^{^{23}}$ *Id*.

²⁴ About the LCME, *supra* note 20.

²⁵ Recognition of the LCME by the U.S. Department of Education and the World Federation for Medical Education (WFME), LIAISON COMM. ON MED. EDUC., https://perma.cc/SV6J-HTV8.

Nondiscrimination Requirements for Medical Schools on the Basis of Race, Color, and National Origin pursuant to Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll., 600 U.S. 181 (2023), U.S. DEP'T OF HEALTH & HUM. SERVS., https://perma.cc/856S-GGCD.
 Id.

HHS warned that seemingly neutral programs may, upon closer inspection, function as vehicles for race-based decision-making in violation of federal law. For example, medical schools may not rely on application materials, such as "personal statements, writing samples, or extracurricular activities," to deduce an applicant's race and then apply differential treatment.²⁸ Nor may DEI programs grant advantages or impose burdens based on assumptions tied to racial identity rather than individual merit. Such practices not only contravene civil rights laws but also foster a racially hostile environment that deprives students of equal participation in academic life.²⁹

HHS further advised all medical schools "to: (1) ensure that all policies, procedures, and practices are fully consistent with applicable federal civil rights laws; (2) discontinue the use of any criteria, tools, or processes that serve as substitutes for race or are intended to advance race-based decision-making; and (3) cease reliance on third-party contractors, clearinghouses, or data aggregators that engage in prohibited uses of race." Medical schools that do not comply with federal law are subject to investigation and "measures to secure compliance," that could affect their continued eligibility for federal funding. 31

C. DOJ Issues Guidance for Federal Funding Recipients Regarding Unlawful Discrimination

On July 29, 2025, Attorney General Pam Bondi issued a formal memorandum on behalf of DOJ to all federal agencies, providing guidance to recipients of federal funding regarding unlawful discrimination.³² The memorandum opens by reaffirming one of the Nation's "bedrock principles:" that "all Americans must be treated equally," and it declares that the federal government "will not stand by while recipients of federal funds engage in unlawful discrimination."³³ The guidance emphasizes that discrimination based on race, color, national origin, sex, religion, or other protected characteristics is "illegal under federal law" and "dangerous, demeaning, and immoral," regardless of whether it is cloaked in facially neutral proxies, advanced under benign labels, or promoted under the pretext of virtuous objectives.³⁴

²⁸ Id.; see also 600 U.S. at 230 ("[U]niversities may not simply establish through application essays or other means the regime we hold unlawful today.").

²⁹ *Id*.

 $^{^{30}}$ *Id*.

 $^{^{31}}$ *Id*.

³² Memorandum for All Federal Agencies, U.S. DEP'T OF JUST., https://perma.cc/658Q-6URQ.

 $^{^{33}}$ *Id*.

 $^{^{34}}$ *Id*.

According to the memorandum, "preferential treatment occurs when a federally funded entity provides opportunities, benefits, or advantages to individuals or groups based on protected characteristics in a way that disadvantages other qualified persons" or groups absent "very narrow exceptions." This includes scholarships reserved exclusively for specific racial groups that "exclude[] otherwise qualified applicants of other races even if they meet academic or financial need criteria," any race-exclusive opportunities, such as "internships, mentorship programs, or leadership initiatives that reserve spots for specific racial groups" to "promote diversity," and preferential hiring practices. The memorandum also makes clear that federally funded entities may not implement recruitment strategies that target geographic areas or institutions chosen primarily because of their racial or ethnic composition, or require applicants to submit "diversity statements" or describe "obstacles they have overcome" in a way that functions as a proxy for discerning protected characteristics. 36

As one of the largest recipients of federal funding, this guidance squarely applies to Harvard Medical School. By continuing to operate a comprehensive DEI framework that conditions access to admissions, scholarships, clerkships, Harvard-affiliated residency programs, and research initiatives on race, sex, and other protected traits, Harvard engages in the very conduct DOJ has warned will trigger enforcement.

Federal law is unambiguous: unlawful discrimination occurs when individuals are treated differently or denied access to participation, benefits, advancement, or other opportunities because of their race, color, or national origin.³⁷ Accordingly, Harvard Medical School has defied the legal requirements of Title VI and the Equal Protection Clause by continuing to operate a discriminatory regime that conditions access to admissions, scholarships, residencies, and other opportunities on protected characteristics.

³⁵ *Id*.

³⁶ *Id*.

³⁷ 34 C.F.R. § 100.3(b).

II. DEI at Harvard Medical School

A. Harvard Is Circumventing Compliance by Rebranding DEI Programs

Harvard has not merely preserved its discriminatory DEI framework—it is working to "redouble its emphasis" to "build a culture of belonging," preserving its race and identity-based preferences within medical school admissions, scholarships, faculty recruitment, outreach initiatives, academic curriculum, and governance. As part of this effort, Harvard is executing a calculated strategy—changing names, titles, and department structures while preserving the substance of its discriminatory DEI practices.

New euphemisms such as "Culture and Community Engagement," "Constructive Engagement," "Community and Campus Life," "Inclusive Excellence," and "Diversity, Inclusion, and Belonging" have replaced overt DEI policies, practices, and programs serving as rhetorical camouflage to shield noncompliance from legal scrutiny.

Harvard's official website makes this intent clear in describing the mission of its newly rebranded "Office for Community and Campus Life."⁴⁴ This office is the successor to Harvard's Office for Equity, Diversity, Inclusion, and Strategic Belonging, which was renamed in April 2025 as part of a realignment strategy to continue the same DEI efforts under a new banner, with no change in mission or personnel.⁴⁵

Sherri Ann Charleston, appointed Harvard's Chief Diversity Officer in August 2020,⁴⁶ now leads the rebranded office under the new title of Chief Community and Campus Life Officer.⁴⁷ In a university-wide announcement, Charleston stated the office would

³⁸ Our Commitment to Community, HARV. UNIV., https://perma.cc/9U6Z-CDMN.

³⁹ Selection Factors, *supra* note 7.

⁴⁰ Faculty Recruitment, HARV. MED. SCH., https://perma.cc/ZD2M-CETD.

⁴¹ Societal Themes, HARV. MED. SCH., https://perma.cc/5QKS-E742.

⁴² Community and Campus Life, *infra* note 48.

⁴³ Diversity, Inclusion, and Belonging, HARV. MED. SCH., https://perma.cc/L226-28T2.

⁴⁴ Id.

⁴⁵ Nina Pasquini, *Harvard Renames Diversity Office*, HARV. MAG. (Apr. 29, 2025), https://perma.cc/A3BT-MRYK.

⁴⁶ Nate Herpich, Sherri Ann Charlston Named Chief Diversity and Inclusion Officer, HARV. GAZETTE (June 22, 2022), https://perma.cc/Q2QJ-CNLQ.

⁴⁷ Pasquini, *supra* note 45.

"redouble its emphasis" on building a "culture of belonging," "expanding and supporting programs" that give Harvard community members "greater opportunities to engage across difference," and enhance support for first-generation and low-income students. These covert descriptors are proxies, enabling Harvard to preserve its race-conscious and discriminatory infrastructure under a different name. In practice, Harvard has offered no explanation of how this "focus" differs substantively from its prior DEI regime.

Charleston pointed to Harvard's 2024 Pulse Survey, administered under the direction of the renamed Office for Community and Campus Life—the very office that replaced Harvard's original DEI command center, as justification for these efforts. ⁴⁹ However, the Pulse Survey itself is a DEI tool designed to entrench the very practices Harvard is required by law to dismantle. ⁵⁰

The initial 2019 Pulse Survey⁵¹ was administered by the "Office of Diversity, Inclusion, and Belonging at the request of the Presidential Task Force on Inclusion and Belonging"⁵² and was "designed as a first step to help inform priorities, practices, and policies" aligned with Harvard's stated goal of building "inclusive excellence"⁵³—a model created by the American Association of Colleges and Universities to embed DEI principles into university governance.⁵⁴

B. Harvard Medical School Has Adopted the Same DEI Rebranding Scheme

Harvard Medical School's operations reflect the same deliberate rebranding pattern as the university. In June 2025, Dean George Q. Daley announced that the name of the "Office for Diversity, Inclusion, and Community Partnership" had been changed to the "Office for Cultural and Community Engagement." The long-standing Office of Recruitment and Multicultural Affairs—which explicitly focused on recruiting students from underrepresented groups—was folded into the Office of Student

⁴⁸ Community and Campus Life, HARV. MED. SCH., https://perma.cc/N7RH-NDDP.

⁴⁹ *Id*.

⁵⁰ The Pulse Survey, HARV. UNIV., https://perma.cc/DS3M-4D77.

⁵¹ Pulse Survey on Inclusion & Belonging: 2019 Results, HARV. UNIV., https://perma.cc/9YPM-G43X.

⁵² The Pulse Survey, *supra* note 50.

⁵³ *Id*.

⁵⁴ Making Excellence Inclusive: A Framework for Embedding Diversity and Inclusion into Institutional Practices and Policies, Ass'n of Am. Colls. & Univs. (2005), https://perma.cc/4G6X-G3TC.

Affairs.⁵⁵ However, Daley confirmed in the same announcement that this discriminatory recruiting program would "continue in a fully integrated way" within the Office of Student Affairs.⁵⁶

Harvard Medical School's DEI Office, now rebranded, was established in 2002 to "promote the increased recruitment, retention, and advancement of diverse faculty," particularly from racial groups considered "underrepresented in medicine," and to oversee "all diversity activities" at the medical school.⁵⁷ Within this office, the Minority Faculty Development Program operates a race-conscious pipeline to "address crucial pipeline issues" and increase the "pool of minority and disadvantaged students" in medicine through initiatives beginning as early as middle school and continuing through postgraduate education.⁵⁸

Daley stated the office would remain under the leadership of Dr. Joan Reede, the "Dean of Diversity and Community Partnership," ⁵⁹ and would "continue to focus" on two main areas, including "providing opportunity and access to help individuals thrive." ⁶⁰ This euphemistic language reflects preferential recruitment and confirms that Harvard's rebranding is not a true departure from discriminatory policies but the continuation of a decades-long system of race- and identity-based favoritism.

Harvard's "Better Together Plan" is another clear example. Originally published under the Office for Diversity, Inclusion, and Community Partnership, the plan describes a "long-term ambitious plan" to make the medical school the "destination for diverse individuals" with "across-the-board increased representation of underrepresented and historically marginalized individuals," such as those underrepresented in medicine ("URM"), women, and those who "identify as LGBTQ."61

⁵⁵ George Q. Daley, Our Continued Commitment to Culture and Diversity, HARV. MED. SCH.: MESSAGES FROM THE DEAN (June 4, 2025), https://perma.cc/C945-FXUB.

⁵⁶ *Id*.

⁵⁷ Diversity at Harvard Medical Schools and HMS Affiliated Hospitals, HARV. MED. SCH., https://perma.cc/6AY2-ZTXW.

⁵⁸ *Id*.

⁵⁹ Joan Y. Reede, MD, MS, MPH, MBA, HARV. MED. SCH., Biography, https://perma.cc/VFF5-Q33X.

⁶⁰ Our Continued Commitment to Culture and Diversity, *supra* note 55 (emphasis added).

⁶¹ Better Together Plan, HARV. MED. SCH., https://perma.cc/7V33-NBKC.

In July 2025, this plan had also been rebranded.⁶² However, this rebranding does not represent compliance; it reflects a conscious effort to obscure the continuation of the same race- and identity-based policies under new terminology. Harvard's deliberate use of euphemisms and bureaucratic reshuffling reflects a conscious effort to conceal ongoing civil rights violations under the veneer of reform, when in substance, it has not abandoned discriminatory preferences at all.

C. Harvard Medical School Has Integrated DEI "Societal Themes" Throughout its Curriculum

Harvard Medical School has embedded into its curriculum a framework known as "Societal Themes," which includes DEI topics designed for "longitudinal curricular integration" across all coursework and clinical rotations.⁶³ These themes are not peripheral or optional. They are designed to shape every aspect of medical education and professional formation. In doing so, Harvard is codifying identity-based ideological instruction under the guise of health care training—violating federal civil rights law and recent Executive Orders.

Among the most concerning themes are "Health Equity" and "Sexual and Gender Minority Health."⁶⁴ Each one reflects Harvard's use of race, sex, sexual orientation, and gender identity as central organizing categories in curriculum, assessment, and professional development. These themes are not facially neutral; they are explicitly ideological and function as policy vehicles to embed race-conscious and sex-based viewpoints into medical training.

The Health Equity theme rests on the premise that inequities in health outcomes are rooted in systemic injustice and that future physicians have a "moral imperative" to achieve justice through medicine.⁶⁵ According to Harvard, the goal of the Health Equity theme is to "ensure that each course and clerkship addresses health equity issues," "provides social context" for how "inequities manifest in patient populations," and to teach students how to build "more equitable health systems."

⁶² Office for Culture and Community Engagement: Better Together, HARV. MED. SCH., https://perma.cc/ZTQ9-QDZJ.

⁶³ Societal Themes, *supra* note 41.

⁶⁴ *Id*.

⁶⁵ *Id*.

⁶⁶ *Id*.

The goal is not clinical excellence. It is a system transformation that "transforms how medicine is conceptualized and practiced." This is achieved through mandatory instruction on social determinants, racial and class-based disparities, and reengineering care delivery systems to equalize outcomes. The competencies outlined by the Health Equity theme are not medically neutral. They explicitly align students toward a political mission of "achieving justice in health for all," which redefines the physician's role from healer to social activist.

The Sexual and Gender Minority ("SGM") Health theme similarly embeds an unlawful agenda. Harvard proudly declares that 15 to 20 percent of incoming medical students identify as LGBTQIA+ (lesbian, gay, bisexual, transgender, queer, intersex, asexual, and all sexual and gender minorities)⁶⁹ with a "strong passion and expectation for SGM health engagement." Rather than training students to provide individualized, evidence-based care to all patients, regardless of identity, Harvard elevates this category of patients above others and tailors its core instruction accordingly. This includes redefining sex and gender in clinical contexts, mandating intersectional approaches that center "racial equity," and cultivating "affirming" environments based on gender ideology.⁷¹

The program's objectives are not limited to medical content. Harvard openly states it seeks to reform the student body's values, attitudes, and behavior, and that it tracks success not only through curriculum content but through increases in LGBTQIA+student matriculants and changes to student life and culture.⁷²

Together, these themes violate federal civil rights laws and Executive Order 14173.⁷³ That order categorically prohibits the use of race, ethnicity, sex, sexual orientation, or gender identity in any policy or practice of a federally funded institution. It requires recipients of federal funds to certify that they do not engage in unlawful discrimination or maintain any program that conditions access to benefits or opportunities on protected characteristics and further directs federal agencies to withhold funding and initiate enforcement actions against institutions that promote or conceal discriminatory programs, regardless of how they are labeled.

⁶⁷ Societal Themes, *supra* note 41.

⁶⁸ *Id*.

⁶⁹ *Id*.

⁷⁰ *Id*.

¹a.

⁷¹ *Id*.

 $^{^{72}}$ *Id*.

⁷³ Executive Order 14173, *supra* note 13.

Harvard's use of "Societal Themes" to compel adherence to race- and identity-based discrimination is a textbook example of mechanisms of indoctrination designed to prioritize group identity over individual merit and to reorient medical training away from scientific standards and toward political activism. Branding these programs as "health equity" or "community engagement" does not cure their illegality. As the Executive Order makes clear, euphemistic terminology does not shield an institution from liability. The substance controls, and in substance, these programs are discriminatory. These societal themes should not exist in any academic institution, let alone one receiving federal funds.

III. Harvard Continues to Violate SFFA

Harvard Medical School's admissions process circumvents the Supreme Court's ruling in *SFFA*⁷⁴ by continuing to employ a "holistic admissions review" designed to "build a diverse student body."⁷⁵ While its website does not expressly state that it considers race, its application process utilizes diversity-based essay prompts structured to elicit racial and identity-based information about an applicant in ways that allow admissions officers to discern race and other protected characteristics.⁷⁶

In SFFA, the Court ruled that the race-based admissions policies at Harvard and the University of North Carolina ("UNC") violated the Equal Protection Clause of the Fourteenth Amendment and made clear that "eliminating racial discrimination means eliminating all of it."⁷⁷ In its opinion, the Court rejected "amorphous" goals such as "diversity" and "equity" as insufficient to justify racial classifications, emphasizing that any use of race must satisfy strict scrutiny and have a "logical end point."⁷⁸ It made clear that race-based preferences or penalties are unconstitutional, even if adopted to remedy past disparities, and that policies rooted in racial stereotypes cannot stand.⁷⁹ Moreover, it made clear that Title VI of the Civil Rights Act, which prohibits discrimination in federally funded programs, imposes the same legal obligation on private institutions like Harvard as the Equal Protection Clause

⁷⁴ SFFA, supra note 2.

⁷⁵ Selection Factors, *supra* note 7.

⁷⁶ Shemmassian Academic Consulting, Watch Me Analyze Every Harvard Medical Essay Prompt, (YOUTUBE, May 2, 2025), https://perma.cc/RYP2-E7Q4.

⁷⁷ SFFA at 206.

⁷⁸ *Id.* at 210–14.

⁷⁹ *Id.* at 226–27.

does on public universities. Thus, the Court's ruling binds Harvard today as firmly as it did at the time of the judgment.⁸⁰

A. Harvard Medical School Continues to Embrace the Very Rationale for Race-Based Admissions the Supreme Court Rejected

Despite the Supreme Court's ruling in *SFFA*, Harvard still embraces the very justifications for race-based admissions the Court rejected. In April 2025, Harvard still adhered to its commitment to a "long-term ambitious plan" to make its medical school the "destination for diverse individuals."⁸¹

Harvard's "Better Together Plan" launched by its Task Force on Diversity and Inclusion, seeks to address issues of "health disparity and social justice" and sets a "vision for success" that includes "across-the-board increased representation of underrepresented, historically marginalized individuals such as URM [underrepresented in medicine], women, and those who identify as LGBTG" at every level of the medical school. Most notably, it consistently tracks, monitors, and publishes outcomes for its diversity, inclusion, and belonging efforts to hold itself accountable for "improving representation and climate." 83

Harvard adheres to the AAMC's definition of "underrepresented in medicine," which refers to racial and ethnic populations historically marginalized and underrepresented in the medical profession relative to their numbers in the general population.⁸⁴ This includes individuals identifying as "American Indian or Alaska Native; Black or African American; Hispanic, Latino, or of Spanish Origin; or Native Hawaiian or Other Pacific Islander."⁸⁵

Harvard Medical School's 2024 Dean's Report states that the university "needs to do more to recruit the most talented [URM] students." By defining underrepresentation exclusively in racial and ethnic terms, and by expanding this framework to include sex and sexual orientation, Harvard Medical School categorically penalizes White, male, heterosexual, and Asian applicants from these

⁸⁰ Id. at 289–90 (Gorsuch, J., concurring).

⁸¹ Better Together Plan, HARV. MED. SCH., https://perma.cc/7V33-NBKC.

⁸² *Id*.

⁸³ *Id*.

⁸⁴ Facts Glossary, ASS'N OF AM. MED. COLLS., https://perma.cc/R8XW-WXHE

 $^{^{85}}$ Id.

⁸⁶ Dean's Report: The Magnetic Pull of Harvard Medical School, Harv. Med. Sch. (2024) https://perma.cc/5Q4D-2UMA.

recruitment and advancement priorities. This is neither race-neutral nor constitutionally permissible.

Harvard's use of URM status parallels the "underrepresented minority" preferences at issue in *SFFA*, where Harvard's holistic admissions process considered race as a factor in assigning numerical scores, and UNC provided a "plus" based on race, both of which were deemed unconstitutional for treating applicants as members of racial groups rather than individuals. As the Court stated, "[a] tip for one race necessarily works as a penalty against other races."87

The Court also condemned admissions practices grounded in racial stereotypes, including the assumption that applicants of certain races inherently possess distinct minority viewpoints.⁸⁸ Harvard's use of URM status does precisely that. It presumes that members of racially favored groups offer superior perspectives based solely on their race.

B. Harvard's "Holistic Admissions" Process Fails the Logical End Point Test Required Under Strict Scrutiny

In *SFFA*, the Supreme Court made clear that private institutions receiving federal funding, like Harvard, are bound by equal protection principles. Any use of race must satisfy strict scrutiny, requiring the policy to be narrowly tailored to serve a compelling public interest.

The Court adopted a "logical end point" test to evaluate whether institutions had a plan to end race-based admissions. Harvard's "holistic" admissions process failed the test under strict scrutiny then, and it fails the test today.⁸⁹

Harvard claims it is "committed to a diverse student body," but the Court in *SFFA* concluded that such goals still amounted to racial balancing because the schools monitored racial composition year over year and adjusted admissions to achieve preferred racial outcomes. Harvard still follows this same impermissible model. 92

⁸⁷ SFFA at 293–94.

⁸⁸ Id. at 219 (quoting Grutter v. Bollinger, 539 U.S. 306, 333 (2003)).

⁸⁹ *Id.* at 221 (quoting *Grutter*, 539 U.S. at 342).

⁹⁰ Commitment to Diversity, *supra* note 6.

⁹¹ SFFA at 221.

⁹² Class of 2028 Facts and Figures, HARV. MED. SCH., https://perma.cc/8S5U-SXY8.

It prioritizes applicants from groups "underrepresented in medicine," and actively seeks to recruit and increase the enrollment of URM students based on comparisons to their proportion in the general population—a rationale the Court flatly rejected as "patently unconstitutional."⁹³

Evidence from Harvard's institutional reporting confirms that its race-based admissions practices are neither incidental nor limited to the School of Medicine—they are part of a comprehensive, university-wide regime of racial engineering. Each year, Harvard publishes class profile reports that disaggregate and monitor the racial, ethnic, and gender makeup of its incoming students.⁹⁴ Prior to the investigations initiated by federal agencies, Harvard Medical School publicly advertised a wide range of programs aimed at recruiting, retaining, and advancing faculty and students from URM groups. Now its webpages have been scrubbed or rebranded.

Harvard offers no measurable justification or temporal endpoint for its race-conscious practices. Instead, it has attempted to obscure them through rebranding and euphemisms, institutionalizing the very preferences the Supreme Court deemed unlawful. Its justification that the "diversity of the student body" enhances the "education of the physician" reflects the same rationale that the Supreme Court in *SFFA* held to be too vague and amorphous to support the continued use of race-based admissions. 96

Harvard's deliberate and systematic tracking of student demographics to achieve preferred racial outcomes suggests it has employed the very model of race-based sorting that the Court condemned in the strongest possible terms. As the Court in *SFFA* explained, this kind of open-ended, race-focused admissions structure "effectively assure[s] that race will always be relevant ... and that the ultimate goal of eliminating race as a criterion will never be achieved." By embedding race into its so-called "holistic admissions process," disguising racial discrimination as "diversity," and tracking admissions by URM categories, Harvard does precisely what it did in *SFFA*. These practices violate federal law⁹⁹ and undermine the merit-

⁹³ SFFA at 223.

⁹⁴ Admission Statistics: A Brief Profile of the Class of 2028, HARV. UNIV., https://perma.cc/D392-T6YH.

⁹⁵ Selection Factors, *supra* note 7.

⁹⁶ SFFA at 210–14.

⁹⁷ Id. at 224 (quoting City of Richmond v. J.A. Croson Co., 488 U.S. 469, 495 (1989)).

⁹⁸ Class of 2028 Facts and Figures, *supra* note 92.

⁹⁹ U.S. CONST. amend. XIV, § 1 (Equal Protection Clause); see also 42 U.S.C. § 2000d, et seq.

based standards essential to medical education, where competence is not symbolic but a matter of life and death.

C. Harvard Medical School Uses a Parallel Pipeline for Racially Preferred Applications

These policies do not exist in isolation. Harvard has constructed a parallel, race-conscious pipeline to identify, recruit, and advance individuals from its preferred demographic categories at every medical education and training stage. The sprawling advantage system encompasses high school and undergraduate initiatives, medical school pipeline initiatives, clerkships, residencies, and postdoctoral fellowships—all coordinated through Harvard's DEI infrastructure to favor those who are "underrepresented in medicine."

According to Harvard's own materials, these pipeline programs begin "as early as the middle school level" and extend "through the postgraduate level," offering curriculum development, teacher training, student research enhancement, and "career development opportunities." Oversight of these programs is centralized within the Office for Diversity, Inclusion, and Community Partnership, which explicitly frames its mission as "link[ing] HMS faculty, trainees, and students with local, regional, and national community-related activities" aimed at increasing representation of URM students in medicine. On the students in medicine.

These programs function as identity-restricted academic pipelines that provide participants exclusive access to research opportunities, clinical exposure, mentorship, and leadership development while effectively excluding applicants from specific racial groups. As the Supreme Court made clear in *SFFA*, such preferences violate federal law by allocating benefits based on race and disadvantaging others in the process.

D. Harvard Medical School Transparently Violates the Supreme Court's SFFA Decision

The SFFA decision could not be clearer: public and private institutions alike are forbidden from making admissions decisions based on race, even under the guise of "diversity" or proxies, euphemisms, or so-called mission-based language that repackage racial preferences. Yet this is precisely what Harvard is doing under the

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 $^{^{100}}$ Harvard Medical Schools and HMS Affiliated Hospitals, supra note 58.

¹⁰¹ *Id*.

pretext of diversity. It engineers every aspect of its admissions, training, and hiring pipelines to sort, reward, and penalize individuals based on identity rather than merit. These policies violate Supreme Court precedent, Title VI of the Civil Rights Act, the President's Executive Orders, and the U.S. Constitution.

IV. Harvard Medical School's Pipelines, Scholarships, Clerkships, and Affiliated Residency Programs Reinforce Unlawful Discrimination

Harvard Medical School has embedded race- and identity-based preferences into its scholarship, clerkship, and fellowship programs, reinforcing a broader admissions and training framework that prioritizes protected characteristics over merit, skill, and competency. Many of these opportunities are explicitly restricted to, or primarily target, students who are underrepresented in medicine, a designation limited to specific racial groups. ¹⁰² By conditioning access to financial aid, clinical clerkships, networking opportunities, and fellowships on race, sex, or other protected traits, Harvard perpetuates the same discriminatory outcomes condemned in *SFFA*. Examples of Harvard's discriminatory programs include:

- Catalyst Visiting Research Internship Program ("VRIP"): An eight-week summer research and mentorship program for first- and second-year U.S. medical students that explicitly favors "underrepresented minorities and/or disadvantaged individuals." VRIP participants receive research training, mentorship, and networking opportunities designed to serve direct pipelines into Harvard-affiliated residency and fellowship positions.
- The Visiting Clerkship Program ("VCP"): Harvard Medical School reserves this program to provide support exclusively for minority students explicitly defined as "African-American, American Indian, and Hispanic American[s]." VCP facilitates participation in the HMS Exchange Clerkship Program, designed to "increase medical student awareness of opportunities in academic medicine, to increase their consideration of an academic training program for internship and residency, and, especially, to increase the number of minority students applying to HMS-affiliated hospital training programs." 104
- Harvard Affiliated Resident Program Showcase: Marketed as an "expansion" of VRIP, these programs limit participation to URM medical students in their

¹⁰² Facts Glossary, *supra* note 85.

¹⁰³ Harvard Medical School DICP Sheet, HARV. MED. SCH., https://perma.cc/XF3D-REQC.

 $^{^{104}}$ Id.

final two years of medical school. Harvard promises participants exclusive opportunities to "meet and network with Harvard-affiliated residency program training directors, attending physicians, fellows, and residents." ¹⁰⁵

- Dean's Postdoctoral Residency Program: Offers postdoctoral research fellowships, professional development, and mentorship to fellows at Harvard Medical School, particularly individuals from backgrounds underrepresented in science, who will further contribute to diversity."
- Joseph L. Henry Oral Health Fellowship in Minority Health Policy: An academic degree-granting program at Harvard Medical School designed to develop "minority oral health leaders" in health policy, public health, and academia.¹⁰⁷

A. Harvard-Affiliated Residency Programs

Harvard Medical School does not operate its own residency programs. Instead, medical graduates train at Harvard-affiliated teaching hospitals, including Boston Children's Hospital, Beth Israel Deaconess Medical Center, Brigham and Women's Hospital, Cambridge Health Alliance, Dana-Farber Cancer Institute, Massachusetts General Hospital, and McLean Hospital. Each institution publicly emphasizes diversity, equity, and inclusion in residency recruitment and training: 109

• The Harvard Affiliated Emergency Medicine Residency ("HAEMR") at Mass General Brigham has a "HAEMR ROOTS" initiative to increase representation and support for individuals based on race, ethnicity, sexual orientation, gender identity, socioeconomic background, and national origin. 110 The program explicitly works to recruit and advance individuals considered URM, proactively contacts URM applicants "early in the application process in order to increase and maintain diversity within our resident body," and integrates DEI principles into visiting clerkship programs, faculty development, and residency programs. 111

 $^{^{105}}$ *Id*.

 $^{^{106}}$ *Id*.

¹⁰⁷ *Id*.

¹⁰⁸ Harvard Medical Schools and HMS Affiliated Hospitals, *supra* note 58.

¹⁰⁹ TA

 $^{^{110}\,}Harvard\,Affiliated\,Emergency\,Medicine\,Residency,\,\text{HARV.\,MED.\,SCH.,\,https://perma.cc/257F-UTQX.}$

¹¹¹ Id.

- The Harvard Combined Orthopaedic Residency Program comprises four Harvard-affiliated teaching hospitals, embeds "inclusion and diversity" as "foundational elements" of the program, and offers research and development mentorship to "underrepresented minorities in medicine." ¹¹²
- Beth Israel Deaconess Medical Center, a Harvard Medical School teaching hospital, operates a formal Social Justice Pathway within its Internal Medicine Residency Program explicitly focused on training residents to become social justice advocates and activists.¹¹³ This track demonstrates how Harvard-affiliated residency programs integrate activist priorities directly into the professional training and advancement of physicians.

These Harvard-affiliated residency programs exemplify a systemic approach that embeds DEI-driven discrimination into graduate medical education where it simply does not belong. Through its partnership with a vast network of teaching hospitals and research institutes, residency programs routinely structure recruitment, selection, and advancement around race, sex, ethnicity, sexual orientation, and gender identity, rather than merit. These programs receive federal funding yet implement preferential clerkships, mentorships, and pipeline initiatives that explicitly favor, or disfavor applicants based on race or other immutable traits.

By embedding identity-based criteria into the gateway to medical licensure and professional advancement, these Harvard-affiliated programs transform residency training into a vehicle for social-justice activism and demographic engineering. Such practices raise serious concerns under Title VI of the Civil Rights Act, Section 1557 of the Affordable Care Act, and President Trump's Executive Orders. Federal funds are being used to advance ideological and demographic goals rather than a fair, merit-based system for developing the Nation's physicians.

V. Harvard is Advancing Discrimination with Federal Funds Through Medical Research

Harvard trains thousands of medical students annually and employs faculty and staff who oversee clinical care, research, and public health initiatives across the country.

¹¹² The Harvard Combined Orthopaedic Residency Program: A Continued Commitment to Excellence, MASS. GEN. HOSP., https://perma.cc/JD6D-KP6D.

¹¹³ Internal Medicine Social Justice Pathway: Fostering Leaders in Advocacy Work, BETH ISRAEL DEACONESS MED. CTR., https://perma.cc/SEA7-MZQG.

As a federally funded standard-bearer for medical education, biomedical research, and healthcare workforce development, Harvard should set a national example of equal treatment under the law. Instead, it is doing the opposite—advancing discriminatory policies that favor certain groups based on their race, color, national origin, ethnicity, or sex, while unlawfully excluding others.

Since 2021, Harvard has received approximately \$5.7 billion in federal funding, including over \$344 million from the National Institutes of Health ("NIH"). Many of these taxpayer-funded grants support race-based and DEI-driving programs that raise serious concerns under federal laws. Representative examples of grants related to DEI include:

- HHS Grant UM1TR004408 awarded \$21.9 million to Harvard Medical School for its Clinical and Translational Science Center, which coordinates research across 17 Harvard institutions, including Harvard Medical School. The grant embeds DEI as a central focus, pledging to "train and diversify" the "clinical and translational science workforce," prioritize "underrepresented in medicine" investigators, expand participation of "diverse populations" in studies, and pursue community partnerships aimed at reducing so-called "health inequities." 114
- Harvard is seeking to reinstate HHS Project Grant T32DC000038, which obligates \$13.3 million to Harvard Medical School for the interdisciplinary Speech and Hearing Bioscience and Technology doctoral program. While framed as scientific training, the program now prioritizes recruiting underrepresented minorities, revising admissions for "greater equity," and adding a faculty Director of Diversity, Equity, and Inclusion to advance race-conscious goals in admissions procedures aimed at increasing "recruiting activities" in a speech and hearing research pipeline. 116
- HHS Training Grant T32GM144273 awards \$8.9 million to Harvard Medical School to operate MD-PhD programs in partnership with the Massachusetts Institute of Technology. This grant embeds diversity, equity, and inclusion as a core priority, explicitly committing to recruit "diverse young talent," build an "inclusive and dynamic training community," and dedicate leadership to

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¹¹⁴ Project Grant (FAIN: UM1TR00408), USASPENDING, https://perma.cc/V78N-88AP (HHS award).

¹¹⁵ Project Grant (FAIN: T32DC000038), USASPENDING, https://perma.cc/DNC8-M9EU (HHS award).

¹¹⁶ Training for Speech and Hearing Sciences, REPORT, https://perma.cc/75UW-QL8R.

underrepresented minority student and faculty recruitment. It also funds tailored academic, social, and career development programming to advance these DEI objectives. 117

- HHS Grant U19CA291431 awarded \$2 million to Harvard for the Massachusetts Partnership for Community-Engaged Cancer Control Equity. The project frames cancer screening and tobacco treatment within a healthequity and social-determinants framework. 118
- HHS Project Grant R01ES035106 awards \$1.7 million to Harvard to study "climate factors, racial/ethnic disparities, and menstrual cycle health." The project embeds a focus on racial and ethnic disparities, framing menstrual irregularities and reproductive health through climate exposure and equity research targeted at minority women. 119
- HHS Grant P20TW013028 awards \$1.3 million to Harvard for the "Center for Climate: Equitable and Accessible Research-Based Testing for Health." This project frames climate change as a health equity crisis and pledges to develop "culturally sensitive" interventions for "climate justice," targeting "marginalized and at-risk communities" from Boston to Madagascar and South Africa to advance environmental justice and health equity goals. 120

Because Harvard receives federal financial assistance, it is bound by the antidiscrimination provisions of Title VI of the Civil Rights Act of 1964, Section 1557 of the Affordable Care Act, Title IX of the Education Amendments of 1972, 121 and the U.S. Constitution. 122 It is also subject to Executive Orders that prohibit the use of race,- sex-, and identity-based preferences in federally funded programs. These obligations apply across all operations, including admissions, faculty hiring, research, clinical services, and outreach programs.

Executive Order 14151 explicitly directs the heads of federal agencies to review and take action against grantees of federal funds who have used that funding to "provide

¹¹⁷ Project Grant (FAIN: T32GM144273), USASPENDING, https://perma.cc/9Z78-FKFD (HHS Award).

¹¹⁸ Proiect Grant (FAIN: U19CA291431), USASPENDING, https://perma.cc/9GPP-2Z6R (HHS award).

¹¹⁹ Project Grant (FAIN: R01ES035106), USASPENDING, https://perma.cc/8BW4-CH2C (HHS award).

¹²⁰ Project Grant (FAIN: P20TW013028), USASPENDING, https://perma.cc/A6SG-8DS7 (HHS award).

¹²¹ 42 U.S.C. § 2000d, et seq.; 20 U.S.C. §§ 1681–1688.

¹²² U.S. CONST. art. I, § 8, cl. 1; U.S. CONST. art. II, § 1, cl. 1; see also South Dakota v. Dole, 483 U.S. 203, 206-08 (1987).

or advance DEI, DEIA, or 'environmental justice' programs, services, or activities since January 20, 2021."¹²³ Harvard Medical School has received significant federal awards since 2021 and has used those funds to embed DEI ideology into its internal operations, in violation of this directive and other civil rights laws.

Federal grants awarded to Harvard contain nondiscrimination clauses and conditions that prohibit using federal funds for preferential treatment based on race, sex, or other protected traits. For example, NIH grants incorporate the Civil Rights Restoration Act of 1987, which applies Title VI obligations across the entire institution, not just the specific department or program receiving funding. Despite these obligations, Harvard Medical School continues to operate programs, initiatives, and institutional frameworks that prioritize individuals based on race, sex, ethnicity, and similar classifications. These practices are not incidental. Harvard embeds these practices into its grant-funded activities and institutional governance.

VI. Requested Investigatory and Enforcement Actions

Harvard is knowingly using federal funds to operate a system of discrimination that violates the bedrock principles of federal civil rights law, the Constitution, and our Nation's fundamental values of fairness and equality. Through its admissions criteria, faculty, student recruiting pipelines, and academic curriculum, Harvard has institutionalized a framework that favors or disfavors individuals based on traits they're born with and cannot change.

This is not merely a violation of the law. It is a collapse of professional ethics and a betrayal of the medical profession's fundamental obligations. Harvard is conditioning future physicians to look through a lens of discrimination when making judgments, not a lens of merit, character, or competence. This ideological indoctrination undermines the excellence demanded of those who practice medicine and hold the lives of patients in their hands.

Harvard is not above the law. Its prestige does not immunize it from accountability. To ensure full and verifiable compliance with federal civil rights laws, Supreme Court

¹²³ Exec. Order No. 14151, § 2(ii)(3), *supra* note 12.

¹²⁴ See 20 U.S.C. § 1687 (2025) (interpreting Title VI and other nondiscrimination provisions under the Civil Rights Restoration Act of 1987); 45 C.F.R. § 83.3 (2025); NAT'L INSTS. OF HEALTH, NIH Grants Policy Statement § 4.1.2 (2020), https://perma.cc/HS33-W78F. Nondiscrimination clauses in NIH grants to Harvard prohibit preferential treatment based on protected traits, extending federal nondiscrimination requirements to all operations of an entity receiving federal financial assistance, not just the specific program or activity funded.

precedent, and Executive Orders 14151 and 14173, we respectfully request that the Department of Justice:

- 1. Initiate a formal investigation into Harvard Medical School's admissions, scholarships, clerkships, residency pipelines, affiliated residency programs, faculty hiring, and research practices. This investigation should specifically evaluate Harvard's use of "holistic" admissions review, diversity-based essay prompts, and URM classifications to determine whether the school is employing discrimination based on race, sex, or other protected characteristics—directly, or through the use of proxies such as socioeconomic or first-generation status—to influence outcomes in violation of *SFFA*, federal civil rights laws, and President Trump's Executive Orders.
- 2. Investigate Harvard's DEI rebranding scheme to determine whether the university's renaming of its diversity offices and programs constitutes a deliberate effort to evade federal law while maintaining the substance of race-and other identity-based preferences.
- 3. Require Harvard to suspend all classifications, preferences, scoring systems, scholarships, admissions pipelines, and outreach initiatives that grant or deny opportunities based on race, color, sex, national origin, or other protected characteristics.
- 4. Require Harvard to dismantle all DEI infrastructure that perpetuates discrimination, including rebranded offices, committees, advisory boards, and pipeline programs that allocate opportunities based on protected traits rather than individual merit.
- 5. Mandate a public, written certification from Harvard's President attesting to full compliance with federal civil rights laws and Executive Orders 14151 and 14173. This certification should include a detailed inventory of all dismantled DEI-related programs, positions, and initiatives.
- 6. Conduct a comprehensive audit of all federal funding received by Harvard University and its medical school from FY 2021 to present, including all NIH, HHS, or other federal awards supporting DEI-related initiatives. Determine whether these funds have been used to sustain racially or sexually preferential systems. Where violations are found, the DOJ should take immediate steps to

suspend, terminate, or condition future funding in accordance with applicable law and federal enforcement authority.

- 7. Direct Harvard to adopt and publicly implement, prior to the start of the next academic year, a formal institutional policy prohibiting all departments, clinical programs, and affiliated entities from granting preferential treatment on the basis of race, sex, or other identity-based characteristics in any academic, clinical, research, or administrative context, including all affiliated hospitals and residency programs.
- 8. Examine all early pipeline and recruitment initiatives, including middle school, high school, college, and post-baccalaureate programs, to ensure they are not serving as illegal workarounds to race-neutral admissions and do not confer advantages based on protected characteristics.
- 9. Refer findings to HHS, the Centers for Medicare and Medicaid Services, and the Department of Education for enforcement of Title VI, Section 1557, and Title IX, and to suspend federal funding streams currently supporting discriminatory practices.

Harvard must understand that prestige does not place it above the law. When a patient is facing a procedure that carries a risk of death, they do not care what their physician looks like. They want to know whether they have the most competent, highly skilled medical physician available—and whether that physician can help them get better or keep them alive.

No institution, regardless of rank or reputation, is entitled to operate a system of federally funded discrimination. Civil rights statutes, Executive Orders, and the United States Constitution apply with equal force to Harvard as they do to any other institution.

So long as Harvard admits students to fulfill racial quotas, awards residencies based on race, sex, national origin, or ethnicity rather than ability, uses socioeconomic status as a proxy for race, and substitutes ideological conformity for clinical competence, they're polluting research and clinical care with bias and prioritizing "equity" over excellence.

Medicine cannot function when ideology is substituted for merit. The consequences are real, and they are measured in lives. We trust this submission will support the

DOJ's oversight and lead to immediate investigation and enforcement action. As the Supreme Court in *SFFA* made clear, "The Constitution deals with substance, not shadows." ¹²⁵ If discrimination persists, so does the violation.

Thank you for your time and attention to this matter.

Sincerely,
/s/ Megan Redshaw
America First Legal Foundation

Cc: The Honorable Pamela J. Bondi, Attorney General, U.S. Department of Justice The Honorable Robert F. Kennedy Jr., Secretary, U.S. Department of Health and Human Services

Paula M. Stannard, Director, Office for Civil Rights, U.S. Department of Health and Human Services

Gregory W. Brown, Deputy Assistant Attorney General, Civil Rights Division, U.S. Department of Justice

The Honorable Linda McMahon, U.S. Department of Education Craig Trainor, Acting Assistant Secretary for Civil Rights, U.S. Department of Education

The Honorable Andrea R. Lucas, Acting Chair, U.S. Equal Employment Opportunity Commission

Jennifer O'Connor, General Counsel, Harvard University

George Q. Daley, Dean of Medical School, Harvard University

Alan Garber, President, Harvard University

Andrea Joy Campbell, Attorney General, Massachusetts

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¹²⁵ SFFA at 230 (quoting Cummings v. Missouri, 71 U.S. 277, 325 (1867)).

APPENDIX

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ABOUT **ADMISSIONS** FINANCIAL AID MD PROGRAM STUDENT LIFE STUDENT SERVICES EDUCATOR RESOURCES MD PROGRAM HOME / MD PROGRAM / CURRICULUM / ▼ Curriculum **Societal Themes** Pathways • Health Sciences & The societal themes are identified as topic areas for longitudinal curricular integration across the preclerkship, PCE, and post-Technology PCE phases, for all students in the MD program at HMS: Societal Themes • Aging and End-of-Life Course Catalog • Climate Change, Environment and Health **Combined Degrees** • Interprofessional Collaborative Care Student Research • Sexual and Gender Minority Health • Substance Use and Pain • Trauma-Informed Care **Global Experiences** $Addressed\ through\ specific\ topic\ sessions\ and\ inclusion\ in\ course\ and\ clerkship\ learning\ objectives,\ the\ societal\ themes\ aim\ to$ ensure that the curriculum includes instruction in the diagnosis, prevention, appropriate reporting, and treatment of the medical **Academic Calendars** consequences of common societal problems. Student Handbook Registrar SOCIETAL THEMES

→ AGING & END-OF-LIFE CARE
 → CLIMATE CHANGE, ENVIRONMENT & HEALTH
 → HEALTH EQUITY
 → INTERPROFESSIONAL COLLABORATIVE CARE
 → SEXUAL & GENDER MINORITY HEALTH
 → SUBSTANCE USE & PAIN
 → TRAUMA-INFORMED CARE

SOCIETAL THEMES

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AGING & END-OF-LIFE CARE



CLIMATE CHANGE, ENVIRONMENT & HEALTH



HEALTH EQUITY

Theme Description

Medical educators face a moral imperative to ensure that future physicians possess the knowledge, skills, attitudes, and behaviors to provide equitable care for all patients. Yet, parts of medicine are still anchored in unequal systems that continue to this day.

Over twenty years ago, Unequal Treatment, a landmark publication from the National Academy of Medicine, outlined the prevalence and impact of health disparities in medicine. Even today, documentation of health inequities is pervasive throughout the medical literature, and no specialty or field is immune.

These inequities in health and health care are driven by many factors, including underlying societal problems that shape the social determinants of health and lead to increased disease burden, higher costs of care, poorer quality-of-life, and ultimately shorter lifespans for some patient populations.

The goal of the Health Equity theme is to ensure that each course and clerkship addresses health equity issues, provides social context to the ways in which inequities manifest in patient populations, and teaches students how to build more equitable health systems for all.

Health Equity competencies and learning objectives will ensure that students continue to grow in their journey toward advancing health equity in clinical care. With faculty, student, and community experts, this theme aims to develop an innovative health equity curriculum that transforms how medicine is conceptualized and practiced as a means for achieving justice in health for all.

Faculty Directors:

Rose L. Molina, MD, MPH

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SEXUAL & GENDER MINORITY HEALTH

Theme Description

The field of sexual and gender minority (SGM) health continues to experience explosive growth, from basic sciences to clinical innovation to systems- and policy-level implementation. HMS students can and want to be change agents to ensure equitable access to culturally-responsive care for all.

At HMS, instruction in SGM health clinical skills is in high demand. Each year, 15–20% of incoming HMS medical students are LGBTQIA+, with a strong passion and expectation for SGM health engagement. On a national level, SGM health rights are under grave and direct threat, with bans on access to basic health care for LGBTQIA+ (lesbian, gay, bisexual, transgender, queer, intersex, asexual, and all sexual and gender minorities) communities in motion across dozens of US states and countries.

The Sexual and Gender Minority Health Equity Initiative integrates SGM health content throughout the core curriculum and cultivates an educational climate conducive for engaging students and faculty in SGM health education.

The initiative employs innovative strategies to:

- Comprehensively review existing SGM health curricular content and climate
- Integrate content across courses and clerkships
- · Lead with LGBTQIA+ community engagement
- Adopt an intersectional approach that centers racial equity
- · Cultivate safe, affirming educational environments for LGBTQIA+ and non-LGBTQIA+ students, faculty, and staff
- Better prepare all graduating students to care for SGM patients;
- Enhance faculty knowledge, skills, attitudes, and confidence teaching SGM health
- Evaluate effectiveness and impact of SGM health curricular innovations
- · Prioritize sustainability of curricular innovations
- Publicly share and disseminate SGM health curricular products and tools

Key outcomes of the initiative have focused on five key areas:

- 1. Development of nine SGM health competencies
- 2. Stakeholder engagement (HMS students and faculty, national SGM health experts, and LGBTQIA+ community members
- 3. Student life and educational climate (increased LGBTQIA+ student matriculants, enhanced mentorship and support)
- 4. Curriculum development and refinement (authentic LGBTQIA+ standardized patient experiences, clerkship toolkit design, ad hoc consultation for faculty)
- 5. Faculty development (multimedia curriculum on content and process to teach SGM health)

The SGM curriculum will better equip HMS students and faculty to provide culturally responsive care to LGBTQIA+ patients. Through the sustainable integration of knowledge, skills, and attitudes related to sexual orientation, gender identity, and sex development, the Sexual and Gender Minority Initiative aims to optimize the health and wellbeing of all.

Faculty Directors:

Alex Keuroghlian, MD, MPH Jennifer Potter, MD

ABOUT ADMISSIONS FINANCIAL AID MD PROGRAM STUDENT LIFE STUDENT SERVICES

ADMISSIONS

No We Are
Before You Apply
When to Apply
Selection Factors
Eligibility Requirements
Policies
FAQ
How to Apply

HOME / ADMISSIONS / BEFORE YOU APPLY /

Selection Factors

Admission to Harvard Medical School is very selective. We seek students of integrity and maturity who have concern for others, leadership potential, and an aptitude for working with people.

The Committee on Admissions evaluates applications based on several factors, including the following:

- · Academic records
- · Applicant essay(s)
- MCAT scores
- · Letters of evaluation
- · Extracurricular activities
- Summer occupations
- · Life experiences
- · Experience in the health field, including research or community work

The education of a physician is enhanced by the diversity of the student body.

The Committee on Admissions takes a holistic approach to application review.

We do not pre-screen applications. All applicants who submit an AMCAS application and designate Harvard Medical School will receive our secondary application.

Harvard Medical School does not have a rolling admissions policy. The timing of the submission or completion of an application will not affect the applicant's chances of receiving an interview invitation. As long as all application materials are received prior to our final deadline, applicants will receive full consideration. Please see When to Apply for more information.

HELPFUL LINKS Selection Factors Eligibility Requirements Eligibility Restrictions Prerequisite Courses MCAT Letters of Evaluation Technical Standards Recommendations When to Apply

EDUCATOR RESOURCES

Admissions at a Glance
Financial Aid at a Glance

▼ Who We Are Admissions at a Glance Curriculum Commitment to Diversity Campus Tours ▶ Before You Apply How to Apply

Admissions at a Glance

CLASS OF 2028

FACTS & FIGURES

6856 APPLICATIONS, 757 INTERVIEWS

CLASS SIZE



PATHWAYS 135 **HST 30** MD-PHD 14

72% RECEIVE FINANCIAL AID

AVERAGE ANNUAL SCHOLARSHIP \$60,403

SCHOLARSHIP RANGE \$2,487 - \$102,425 **AVERAGE MCAT**

BBFL 130.31 CARS 128.84 CPBS 130.41

Total 520.42

PSBB 130.86





AGES 21 TO 34





AVERAGE GPA 3.9



57 COLLEGES 35 STATES 7 COUNTRIES



73% SCIENCE MAJORS

Harvard Medical School Office of the Committee on Admissions Gordon Hall 25 Shattuck Street Boston, MA 02115

Phone: 617-432-1550 HMS MD Admissions Email: admissions_office@h ms.harvard.edu meded.hms.harvard.edu/ad missions

Hours: 8:00 am - 5:00 pm Monday - Friday In-person Office Hours: By Appointment Only

QUICK LINKS

Cost of Attendance

Admissions Timeline

Virtual Campus Tour

Student Life

Student Groups

Academic Societies

Curriculum

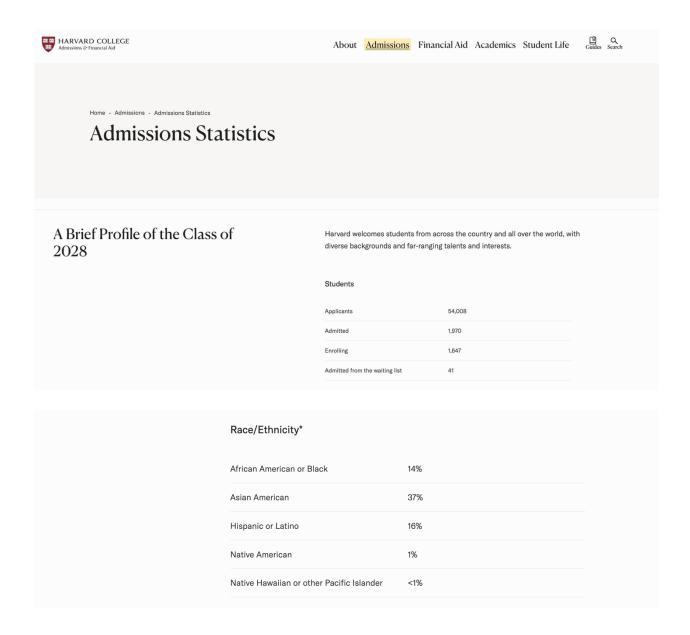
Commitment to Diversity

HMS Match Results

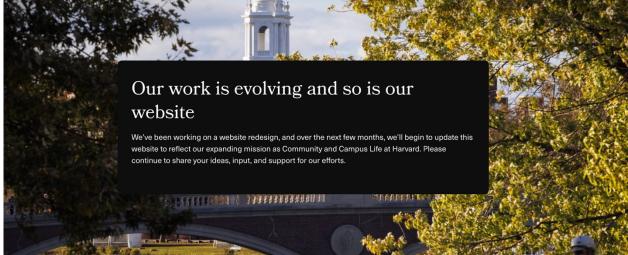
FREQUENTLY ASKED **QUESTIONS**

Eligibility Questions

- · Are international students eligible to apply to HMS?
- Are DACA students eligible to apply to HMS?
- · How many times can I apply to HMS?
- What are the required prerequisite courses for admission to HMS?
- Must I have all prerequisite







What does this tell us? Here at Harvard, we have built a community of excellence composed of individuals from all walks of life. Our challenge today is to help all within that community to realize the benefits of learning, working, and living alongside others who come from various backgrounds, have had different experiences, and hold diverse viewpoints. To be sure, a vital element of the work ahead will be, as ever, to ensure that each individual in our community is free from discrimination and harassment and that all are guaranteed equal access to educational opportunities. But to build a culture of mutual respect, we must also do more. We must sharpen our focus on fostering connections across difference, creating spaces for dialogue, and cultivating a culture of belonging—not as an abstract ideal, but as a lived experience for all.

To capture this emphasis and this mission, our office will become Community and Campus Life, effective immediately. Going forward, our new Office will redouble its emphasis on

- Providing a forum for schools to come together to share best practices on how to build a culture of belonging for all members of the Harvard Community.
- Expanding and supporting programs that give members of our community greater opportunities to engage across difference.
- Enhancing support for first-generation and low-income students.

In the weeks and months ahead, we will take steps to make this change concrete and to work with all of Harvard's schools and units to implement these vital objectives, including shared efforts to reexamine and reshape the missions and programs of offices across the university. Much of that work is already under way in our schools. I look forward to continuing this essential work in partnership with you. Together, we can shape a Harvard anchored in excellence, animated by difference, and strengthened by shared purpose.

In community,

Sherri Ann Charleston

Chief Community and Campus Life Officer

 $\hbox{P.S. You can learn more about the Pulse survey findings and changes to our office in the $\underline{\textit{Harvard Gazette}}$}$

RADIATION AND CANCER | MEDITERRANEAN DIET | RESEARCH AT RISK | HARVARD READS | 🛱 EVENTS

CAMPUS & COMMUNITY

Sherri Ann Charleston named chief diversity and inclusion officer

Diversity and higher ed expert joins Harvard from UW-Madison

Nate Herpich | Harvard Correspondent

June 22, 2020 • 5 min read



Sherri Ann Charleston has been named Harvard's chief diversity and inclusion officer.

Sherri Ann Charleston, one of the nation's leading experts in diversity and higher education, has been named Harvard's chief diversity and inclusion officer (CDIO), President Larry Bacow announced today. Her appointment is effective Aug. 1.









Menu Q













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HE UNIVERSITY announced Monday that it will rename its Office of Equity, Diversity, Inclusion, and Belonging the "Office for Community and Campus Life." Hours later, the new office informed affinity groups via email that it would not host or fund affinity group Commencement celebrations this year, The Crimson reported. The changes come amid mounting pressure from the federal government to dismantle diversity, equity, and inclusion (DEI) initiatives in higher education.

Harvard made headlines in recent weeks for rejecting demands from the federal government related to Harvard's internal affairs, including a call to eliminate DEI practices. After the Trump administration subsequently froze at least \$2.2 billion in federal research funds, the University filed a lawsuit arguing that the freeze violates the First Amendment and established procedures for addressing campus civil rights violations, including antisemitism.



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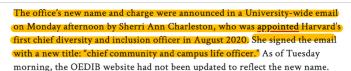
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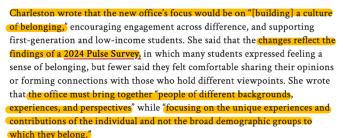




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Charleston added that her office would "take steps to make this change concrete," though she offered no details on what that work would entail. Harvard joins a number of universities across the country in either dismantling or reconfiguring their DEI offices.

Kidney problems, including kidney failure Your healthcare provider should do blood and urine tests to check your kidneys. If you develop new or worse kidney problems, they

YOU MIGHT **ALSO LIKE**



Harvard Retains Winthrop Name

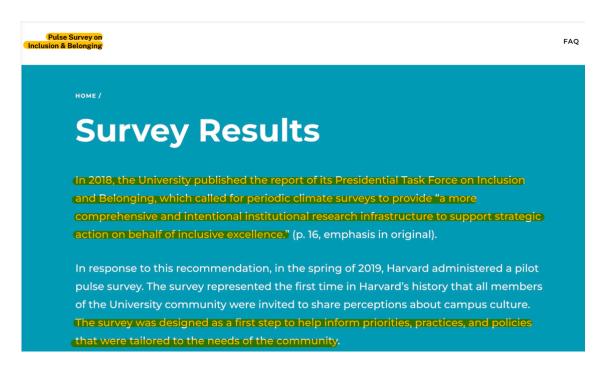
Committee undecided on whether owning slaves merits denaming

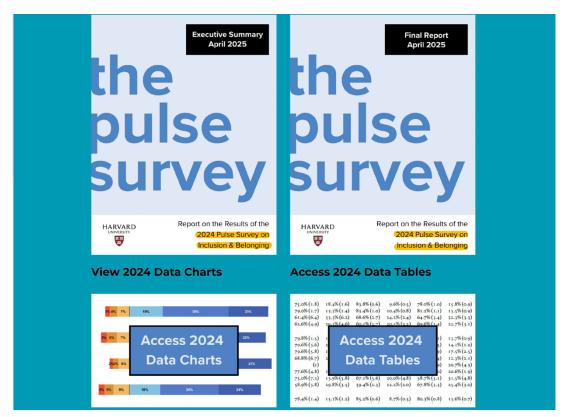


The Harvard Gazette	Findings Campus & Community Health Science & Tech Nation & World Arts & Culture
	Survey results released by Harvard Monday find a strong sense of belonging
	among community members, but lower levels of comfort sharing opinions and
	forming relationships across differences. The new data was released as part
	of a report of the Pulse Survey on Inclusion & Belonging.
	First piloted in 2019 following a recommendation of the Task Force on
	Inclusion & Belonging, the survey seeks to take the "pulse" of the community
	and gauge the climate around inclusion and belonging of the entire campus
	community. Administered for the second time in September 2024, the survey
	asked every member of Harvard — students, faculty, researchers, and staff —
	to share their personal experience as an individual interacting with peers, and
	with the institution as a whole. The results will be integrated with other survey
	data and used to make improvements to programming related to culture and
	community.
	"The Pulse Survey is a valuable tool for assessing how members of our
	community experience the University and understand their place in it," said
	President Alan M. Garber. "The insights it provides will help guide us as we
	work toward creating a culture in which each of us feels included, respected,
	and valued."
	To understand the results of the survey, including areas of strength and areas
	for improvement, the Gazette sat down with Sherri Charleston, chief
	community and campus life officer, and Drew Allen, associate provost for

institutional research and analytics. They shared key findings and next steps

for improving campus culture related to inclusion and belonging.





2019 Results

2019 Survey Results

In the spring of 2019, for the first time in its history, Harvard asked everyone in its community to share perceptions about inclusion and belonging at Harvard in order to count the individual experiences of every single Harvard community member.

Although no survey can illuminate all there is to remedy, nor prescribe all that could be done, the pilot pulse survey was an important first step toward understanding more about inclusion and belonging. The University responded to the survey findings with a number of new investments and programs including: the hiring of Harvard's first Chief Diversity and Inclusion Officer; the establishment of the Office for Equity, Diversity, Inclusion and Belonging; launching the annual EDIB Forum; hosting community dialogues; support for an enhanced set of annual Affinity Celebrations, and more.

Read the 2019 Executive Summary

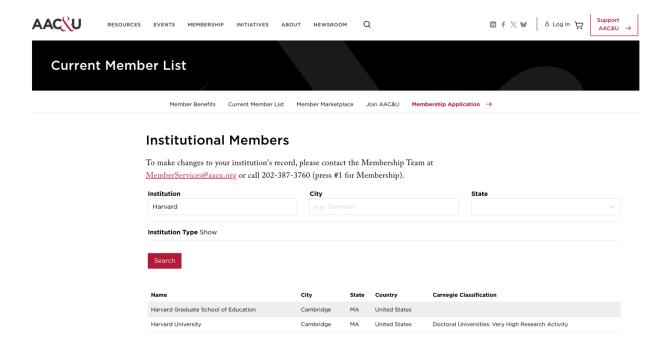


View the 2019 Data Charts

Read the 2019 Final Report



View the 2019 Data Tables





Education & Admissions

Research

News & Events

About HMS

Culture and Community



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Community Values

Harvard Medical School is a community dedicated to excellence and leadership in medicine through education, research and clinical care.

We aspire to excellence through a commitment to our community values.

Collaboration & Service

- We work together to serve our HMS, neighboring, national and global communities.
- We acknowledge that our behavior affects the experiences of others and act in ways that are kind and respectful
 to all.

Diversity & Respect

- · We value and respect all individuals for their unique perspectives, experiences and potential to contribute.
- We foster a culture of inclusion and engagement and communicate respectfully.
- We seek diversity and promote equity and social justice.

O Search



Education & Admissions Research News & Events About HMS



About HMS

Campus and Culture

Mission and Community

Our Core Commitments

Culture and Community

HMS Cares

Statement of Mutual Respect and Public Discourse at HMS

HMS-HSDM Campus Use Rules Supplement

Artwork and Cultural Representations

Emergency Management

The Harvard Medical School community is dedicated to excellence and leadership in medicine, education, research and clinical care. To achieve our highest sepirations, and to ensure the success of all members of our community, we value and promote common ideals that center on collaboration and service, diversity, respect, integrity and accountability, lifelong learning, and wellness and balance. To be a citizen of this community means embracing a collegial sprint that fosters inclusion and promotes achievement. Read about our HMS mission and

collegial spirit that fosters inclusion and promotes achievement. Read about our HMS mission and community values.

For generations, HMS has fostered a culture that has excelled in medical education, clinical care, and biomedical research by adhering to core commitments. Ours is an institution dedicated to innovation in education, to scientific discovery and integrity, to professional development, and to service to humanity.

Since 1906, the HMS campus has formed the nucleus of the Longwood Medical Area, located in the historic Mission Hill neighborhood of Boston. Surrounded by several of its world-renowned affiliated hospitals and research institutions, the iconic HMS Quadrangle is home to the School and its 10 basic and social science departments. A center of teaching, research and learning for nearly 12,000 faculty and more than 11,000 students, residents and postdoctoral fellows, HMS is located on a campus separate from the main Harvard University complex across the Charles River in Cambridge.



Biomedical Science Careers Program (BSCP)

Biomedical Science Careers Student Conference is designed for students from high school to postdoctoral level and addresses the need for student mentoring, guidance, support and career development.

New England Science Symposium: is a forum for postdocs (research and clinical); medical, dental and graduate students; post-baccalaureates; college and community college students selected to present their research projects through oral or poster presentations.

Skills Workshops for College and High School Students provide students and parents/caregivers with information and guidance in areas such as application process for college and medical/graduate/professional schools, interviewing skills, financial planning resume writing and internship opportunities.

CONTACT: Hollie DeSilva, Executive Director, Biomedical Science Careers Program Hollie_DeSilva@hms.harvard.edu - 617.432.0552

Educational Outreach Programs

Advanced Placement Biology Hinton Scholars Program is an after-school enrichment program designed to enhance students' understanding of AP Biology concepts, offer testing preparation for the AP Biology exam, provide laboratory exposure and increase knowledge about careers in science throughout the academic year.

Bridge to AP Biology exposes students from four select high schools in Boston to AP Biology concepts and along with their AP Biology teacher, participate in hands-on lab experiments, and attend academic field trips in preparation for taking AP Biology in September.

Project Success: Opening The Door to Biomedical Careers places high school students (and returning college students) residing in Boston or Cambridge, Massachusetts, particularly students from underrepresented groups and disadvantaged backgrounds, in Harvard research sites where they complete hands-on, paid, mentored summer research projects under the supervision of Harvard faculty.

Reflection in Action: Building Healthy CommunitiesTM (RIA) is a one day event where students in grades six, seven and eight from select schools in Boston and Cambridge come to Harvard Medical School with their classmates and teacher to practice their critical thinking skills in a nurturing environment.

CONTACT: Robert Simpson, Science Educational Programs and Curriculum Specialist Robert_Simpson@hms.harvard.edu - 617.432.1557

Harvard Catalyst Visiting Research Internship Program (VRIP)

The Harvard Catalyst Visiting Research Internship Program is an 8-week mentored summer research program open to firstand second-year US medical school students, particularly underrepresented minorities and/or disadvantaged individuals from accredited US medical schools.

CONTACT: Jessica St. Louis, Program Manager, Harvard Catalyst: Program for Faculty Development and Diversity Inclusion Jessica_St.Louis@hms.harvard.edu-617.432.6928

Visiting Clerkship Program (VCP)

The Visiting Clerkship Program provides support for fourth-year and last quarter third-year minority (African-American, American Indian, and Hispanic American) medical students to participate in the HMS Exchange Clerkship Program. VCP is designed to increase medical student awareness of opportunities in academic medicine, to increase their consideration of an academic training program for internship and residency, and, especially, to increase the number of minority students applying to HMS-affiliated hospital training programs.

CONTACT: Lyn Fulton-John, Program Manager, Office of Diversity Inclusion and Community Partnership Lyn Fulton-John@hms.harvard.edu

Harvard Affiliated Residency Programs Showcase

Harvard Affiliated Residency Programs is an expansion of the HMS Visiting Clerkship Program, this event provides URIM medical students in their 3rd or 4th year from the New England region as well as other states with an opportunity to meet and network with Harvard affiliated residency program training directors, attending physicians, fellows and residents.

CONTACT: Lyn Fulton-John, Program Manager, Office of Diversity Inclusion and Community Partnership Lyn_Fulton-John@hms.harvard.edu

Commonwealth Fund Mongan Fellowship in Minority Health Policy

The Commonwealth Fund Mongan Fellowship in Minority Health Policy is a one-year, full-time, academic degree-granting program designed to prepare physicians for leadership roles in transforming health care delivery systems and promoting health policies and practices that improve access to high performance health care for racial and ethnic minorities, economically disadvantaged groups, and other vulnerable populations.

CONTACT: Ying Wang, Associate Director for Minority Faculty Development Program Ying_Wang@hms.harvard.edu - 617.432.2313

Dean's Postdoctoral Fellowship Program

The Dean's Postdoctoral Fellowship Program offers a range of opportunities including postdoctoral research fellowships, professional development and mentorship to postdoctoral research fellows at Harvard Medical School, particularly individuals from backgrounds underrepresented in science, who will further contribute to diversity through their academic and research scholarship.

CONTACT: Ying Wang, Associate Director for Minority Faculty Development Program Ying_Wang@hms.harvard.edu - 617.432.2313

Joseph L. Henry Oral Health Fellowship in Minority Health Policy

The Oral Health Program is an academic degree-granting program, designed to create oral health leaders, particularly minority oral health leaders, who will pursue careers in health policy, public health practice and academia. The program is intended to incorporate the critical skills taught in schools of public health, government, business, and dental medicine with supervised practicum, leadership forums and seminar series conducted by leading scholars and nationally recognized leaders in minority health and public policy

CONTACT: Ying Wang, Associate Director for Minority Faculty Development Program Ying_Wang@hms.harvard.edu - 617.432.2313

Harvard Catalyst Program for Faculty Development and Diversity Inclusion Faculty Fellowship

A two-year, non-degree Faculty Fellowship Program for Harvard junior faculty designed to address faculty need for additional support to conduct clinical and/or translational research and to free junior faculty from clinical and teaching demands at a key point in their career development.

CONTACT: Jessica St. Louis, Program Manager, Harvard Catalyst: Program for Faculty Development and Diversity Inclusion Jessica_St.Louis@hms.harvard.edu- 617.432.6928

Exhibit 16

HARVARD AFFILIATED RESIDENCY PROGRAMS



d Medical School (HMS).

pansion of the HMS Visiting Clerkship Proovides URiM n purpose is that the participating students would learn more about the residency programs that are offered here at HMS affiliated hospitals through this interactive and informal setting.

The Residency Showcase program begins with brief welcome remarks by Harvard Medical School Office for Diversity Inclusion and Community Partnership and Harvard affiliated hospitals, followed by two panel discussions: 1) Resident Panel Discussion; 2) Residency Program Directors Panel Discussion. Participating students also have an opportunity to interact with representatives at the hospital exhibit tables.

https://mfdp.med.harvard.edu/medicalgraduate/residency_showcase

HMS AFFILIATE DIVERSITY AND FACULTY DEVELOPMENT OFFICES

Office for Diversity, Inclusion and Career Adv 617-667-9120 | diversity@bidmc.harvard.edu https://www.bidmc.org/medical-education/office-for-diversity

617-667-9120 | acfd@bidmc.harvard.edu https://www.bidmc.org/medical-education/academic-careers and-faculty-development

Center for Diversity and Inclusion 617-525-8973 | bwhcdi@partners.org

http://cdi.brighamandwomens.org

Office of Health For

617-919-6511 | healthequity@childrens.harvard.edu http://www.childrenshospital.org/research/office-of-faculty-development/cultural-competency-and-diversity

Office of Faculty Development 617-355-2923 | ofd@childrens.harvard.edu http://www.childrenshospital.org/research/office-of-faculty-

Cambridge Health Alliance Div https://www.challiance.org/about/cha-diversity-council

Center for Professional and Academic Development 617-665-3152 | epd@challiance.org https://chacpad.org

617-632-4385 | ildemaro_gonzalez@dfci.harvard.edu

Office for Faculty Development

https://www.dana-farber.org/for-physicians/education-and-training/

office-for-faculty-developm McLean Hospital

Office of the Chief Academic Officer

617-855-3259 | officeofcao@mclean.harvard.edu

https://www.mcleanhospital.org/training

SETTS GENERAL HOSPITAL Center for Diversity and Inclusion

617-724-3832 | cdi@mgh.harvard.edu

Center for Faculty Development

617-724-0818 | cfd@partners.org http://facultydevelopment.massgeneral.org

DICP-RESIDENCY PROGRAM DIRECTORY





https://dicp.hms.harvard.edu/sites/default/files/files/ResidencyTrainingDirectory.pdf

THE DEAN'S POSTDOCTORAL FELLOWSHIP PROGRAM

hed by the Office for Diversity Inclusion and Com-unity Partnership at Harvard Medical School to develences. The Program includes Dean's Postdoctoral Fellowship and the Scholars in Translational and Academic Research (STARs).

https://mfdp.med.harvard.edu/deanspostdoo

THE COMMONWEALTH FUND FELLOWSHIP IN MINORITY HEALTH POLICY AT HARVARD UNIVERSITY

Health Policy at Harvard University edicine, to become leaders who improve the health of disadvantaged and vulnerable populations through transforming health care delivery systems and promoting innovation in policies, practices and programs that address health equity and the social determinants of health. Up to six one-year, degree-granting fellowships will be awarded per year.

https://mfdp.med.harvard.edu/cff

TRAINING AT A HARVARD HOSPITAL Video





https://vimeo.com/304440313

"At the hospital level, there is a space there, the Center for Diversity and Inclusion, that serves URMs, so if issues come up you have this office that works with your program director."

-- George Molina, MD, MPH, linical Fellow, Surgical Oncology, Brigham and Women's Hospital, Dana Farber Cancer Institute, Massachusetts General Hospital

"A lot of individuals within the Harvard system were not only available, but they were more than willing to meet with me personally and it really broke down some of my own misconceptions and some of my own presumptions as far as what it would mean to apply and to be in a culture where it was, you know, very prestigious and sort of what I would consider at that time to be out of my league."

-- Daniel Gonzalez, MD, Clinical Fellow, Adult Psychiatry , Commonwealth Fund Fellow, Cambridge Health Alliance

Commonwoalth Fund Fellow, Cambridge Health Alliance
"There's such a wide diversity of faculty that the residents
can learn from, that can be role models, and that can really
inspire them."

- Valerie E. Stone, MD, MPH, Chair, Department of Medicine, Mt. Auburn Hospital

"We even have a diversity chief. We have two this year and that's been in place for the past three years and they are really focused on diversity, inclusion, and bettering the

-- Cynthia Akaghosu, MD, Resident, Pediatrics, Boston Combined Residency Program, B<mark>oston Children's Hospital</mark>

"I think this is the place that offers a promising, bright person the broadest array of ways to be the best they can be." — George S.M. Dyer, MD, Program Director, Harvard Combined Orhospeaclic Residen-Massachusetts General Hospital/Brigham and Women's Hospital

ABOUT THE HARVARD MEDICAL SCHOOL OFFICE FOR DIVERSITY INCLUSION AND COMMUNITY PARTNERSHIP

The Office for Diversity Inclusion and Community Partnership (DICP) was established in 2002 to promote the increased recruitment, retention and advancement of diverse faculty, particularly individuals from groups underrepresented in medicine (URIM), at HMS and to oversee all diversity activities involving Harvard Medical School (HMS) faculty, trainees, students and

The Minority Faculty Development Program (MFDP) in the Office for Diversity Inclusion and Community Partnership was created by the Harvard Medical School Faculty Council in 1990 to support the career development of junior faculty and to address the following crucial pipeline issues:

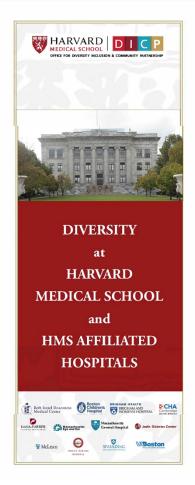
- Increasing the pool of minority and disadvantaged students interested in careers in science and medicine
- Promoting medical students, graduate students, and fellows to develop the needed skills for success in the academic arena
- Advancing the career development of junior faculty

Our pipeline programs begin as early as the middle school level and carry on through the postgraduate level and involve curriculum development, teacher training, enhancing student research, and career development. DICP/MFDP's work addresses HMS' relationship with the community (internal and external) through the provision of programs that link HMS faculty, trainees and students with local, regional and national



Harvard Medical School Office for Diversity Inclusion and Community Partnership 164 Longwood Avenue, 2nd Floor Boston, MA 02115

> www.hms.harvard.edu/dcp 617-432-2413 dcp_mfdp@hms.harvard.edu











Harvard Affiliated Emergency Medicine Residency at Mass General Brigham

Q SEARCH



- HAEMR Gives
- FLIP
- Institutional Support
- Visiting Clerkship Program

Practicing emergency medicine at HAEMR means caring for all members of society and striving for equitable health care. We are on the front lines of public health and violence that disproportionately affect different members of our community. We commit to advancing awareness of disparities in care and creating a clinical and educational environment that highlights inequities and promotes programming and pathways to mitigate these.

Our program offers exemplary clinical training, extensive 1-on-1 mentorship, institutional resources and academic opportunities that allow us to dream big. As a program, we believe and embrace the idea that training resident physicians from all backgrounds drives excellence, inclusion is imperative and a sense of belonging allows residents to bring their authentic selves to our program and hospitals. A fully representative resident body allows trainees to learn from each other's lived experiences and cultivates an inclusive environment for our program, patients and colleagues. Diversity comes in many forms including race, ethnicity, language spoken, sexual orientation, gender identity, disability, religion, country of origin and educational background. We are committed to providing a training experience that embraces inclusion and to increasing representation of residents from varied backgrounds reflective of the patients we serve. We believe that this will help mitigate disparities in healthcare and allow the development of deeper empathy, understanding and respect for the communities we serve around our hospitals.

HAEMR ROOTS

HAEMR ROOTS is a resident-driven initiative that strives to create an academic and cultural environment where everyone can thrive. From race and ethnicity to sexual identity and socioeconomic background, diversity comes in many shapes and sizes. We are committed to highlighting and embracing the life experiences that make each of our residents unique and creating a safe space for everyone in our residency to speak up against instances of discrimination.

Here are some examples of the initiatives we have undertaken to support this mission:

- Created the annual HAEMR ROOTS Biosheet, highlighting the vast diversity of our residents, with future plans to include fellows/faculty
- Proactively contacted URiM applicants early in the application process in order to increase and maintain diversity within our resident body.
- 3. Elicited feedback on how to improve our diversity, equity, and inclusion via an end-of-cycle interviewee survey.

Don't hesitate to reach out to the HAEMR Roots Chairs, Sean Brown (sbrown100@mgb.org), PGY3, and Patricia Hernandez (phernandez9@mgb.org), PGY3.





ADVANCES IN MOTION

Education & Training Clinical Trials Refer a Patient

Specialties

Increasing Program Strength Through Diversity

 $Or thopedic \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, in \, sex \, and \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgical \, special ties \, historically \, lagged \, compared \, to \, other \, surgery \, has \, historically \, lagged \, compared \, to \, other \, surgery \, has \, historically \, lagged \, compared \, historical \, historic$ $racial/ethnic\ diversity, with\ similar\ findings\ prevalent\ across\ residency\ and\ fellowship\ programs.\ The\ most$ recent American Academy of Orthopaedic Surgeons Census reported percentages of 84.7% white, 6.7% Asian, 2.2% Hispanic/Latino, 1.9% African American, 0.4% Native American, and 7.6% women.

Inclusion and diversity represent foundational elements of HCORP. Dr. Bono attributes the focus on these aspects of the program to his predecessor George Dyer, MD, associate professor of Orthopaedic Surgery at Harvard Medical School. Among the lessons learned were how subtle exclusionary practices can be and the necessity to recognize bias intentionally.

Home > Medical Education > Medical Education by Department > Medicine > Internal Medicine Residency Program > Social Justice Pathway

Internal Medicine Social Justice Pathway

Internal Medicine Residency Program Why BIDMC About the Program Who We Are Application Process Primary Care Track Physician-Educator Track Physician-Scientist Track Clinician-Educator Track Physician-Scientist Track Social Justice Pathway Research Opportunities Katherine Swan Ginsburg Humanism in Medicine Program Alumni

Fostering Leaders in Advocacy Work

The mission of the Social Justice Pathway is to equip trainees to be change agents in our healthcare system and society. Profound social and systemic barriers create health inequities that are a feature of our healthcare system. Healthcare professionals have a unique vantage point to speak to the social, economic, and political factors that influence the care our patients receive. Through our social justice didactic curriculum, community outreach, and mentorship, we believe that residents will better understand the injustices in our healthcare system



nd society and be better positioned to find their role in providing solutions.

The Social Justice Pathway is designed for residents who aim to be leaders in advocacy work. Beginning in their PGY2 year, residents will participate in a three-pronged curriculum:

- An immersive didactic course in their PGY2 year
- Local community outreach and advocacy work
- A longitudinal research or innovations project

Through community outreach, residents will be exposed to grassroots efforts to confront social injustices that range from health disparities and food insecurity, to prison, immigrant, and LGBTQ health.

Through didactic presentations and skill-training experiences, residents will deepen their understanding of the complex systems that influence healthcare and appreciate how advocacy interventions at various levels can have longstanding effects at the population level. Residents will be encouraged to develop their own identity as physician advocates in ways that fit their unique interests and personal values.

Research and innovation can become an extension of a resident's identity as an advocate when the work promotes equity, access, and participation for diverse populations. Residents will learn about the needs of the community and will develop practical solutions to respond to those needs. Residents will be paired with a mentor who will provide support and guidance to help with individual or group projects that address local regional, or national social justice issues.



HOME PROGRAMS FACULTY CURRICULUM CLINICAL HOW TO APPLY CURRENT FELLOWS ALUMNI

DIVERSITY & INCLUSION

The program is particularly interested in applications from individuals from underrepresented minority groups. Many research projects participating sites are equal opportunity employers.

RESOURCES AT HARVARD MEDICAL SCHOOL

Office for Diversity Inclusion and Community Partnership

In May of 1990, the Harvard Medical School (HMS) Faculty Council unanimously approved the creation of the Minority Faculty Development Program (MFDP). MFDP is designed to support the career development of junior faculty and to address crucial pipeline

- Increasing the pool of minority students interested in careers in science and medicine
- Promoting medical students, graduate students, and fellows to develop the needed skills for success in the academic arena

FELLOWSHIP SITE DIVERSITY PROGRAMS

Brigham & Women's Hospital

Beth Israel Deaconess Medical Center

Cambridge Health Alliance

Department of Population Medicine

Massachusetts General Hospital



Teaching Hospitals & Affiliates Departments & Offices Dental Medicine Harvard University Giving

O Search

Education & Admissions

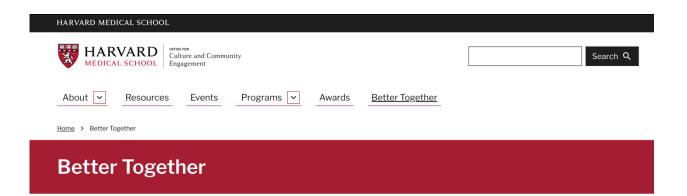
Research

News & Events

About HMS

Better Together Plan





Better Together Revisited

In early 2017, newly appointed HMS Dean George Q. Daley convened the Harvard Medical School Task Force on Diversity and Inclusion (TFDI). Joan Y. Reede, Dean for the Office for Culture and Community Engagement, was appointed chair of a 36-member TFDI, which was composed of faculty, students, trainees, fellows, staff, and administrators from HMS and its affiliated hospitals and research institutions.

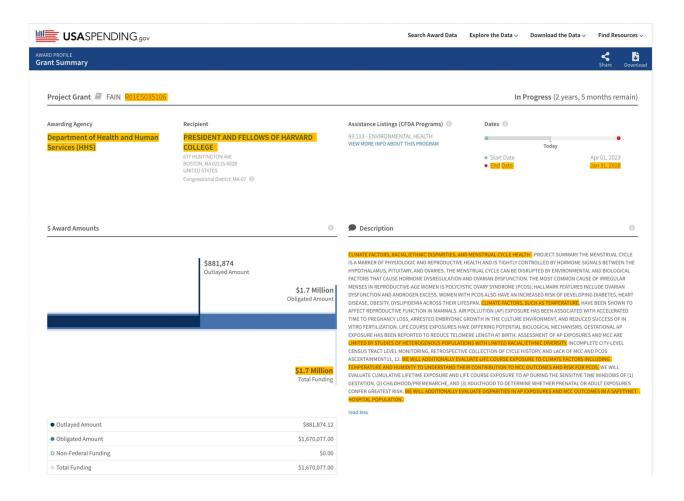
The Task Force met 15 times from February 2017 to May 2019. To gather feedback from members of the HMS community and foster open dialogue, the Task Force also organized Town Halls, listening sessions, focus groups, multiple subcommittees focused on key issues, and an online portal for submission of questions and suggestions. This work resulted in a comprehensive report, which has served as a roadmap for building an inclusive community committed to excellence in teaching, learning, and research, and ensuring that every member feels a sense of belonging and can thrive – HMS Better Together.

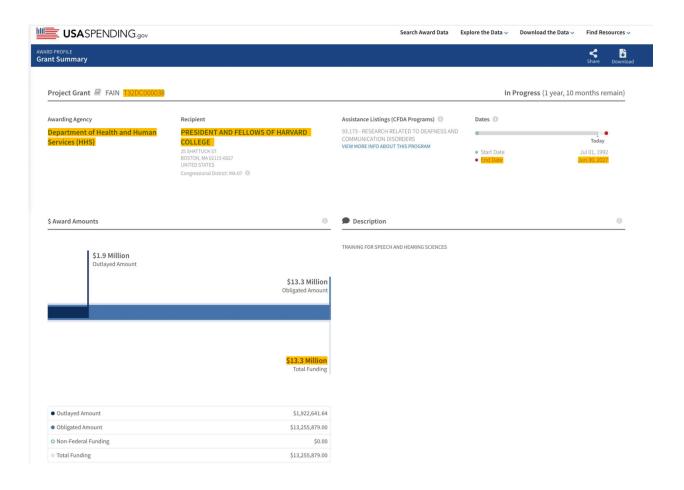
Better Together Themes Revisited:

Theme 1: Build Community and Belonging

- 1. Improve well-being of HMS faculty, trainees, students and staff $\,$
- 2. Promote a climate of collaboration and cooperation
- ${\it 3. Provide time, space and organization for building communities within community}\\$
- 4. Enhance outreach and in-reach with our local, national and global communities

Theme 2: Address Culture and Communication





Training for Speech and Hearing Sciences

Project Number 5T32DC000038-34

Former Number 5T32DC000038-30

Contact PI/Project Leader GELEOC, GWENAELLE S

Awardee Organization
HARVARD MEDICAL SCHOOL



Description

Abstract Text

Project Summary/ Abstract This proposal extends for a period of five years an interdisciplinary doctoral program begun in 1992, the Speech and Hearing Bioscience and Technology (SHBT) program, which prepares scientists for innovative research careers in the Speech and Hearing Sciences, Training is intended to enhance markedly the leadership potential of Speech and Hearing researchers within both academia, industry, and organizations that set science policy. The basic premise of the program is that today's speech and hearing scientists must be fluent in a variety of physical, biological, clinical and cognitive science disciplines to achieve the multidisciplinary advances that drive innovation. A keystone of the program is a rigorous Core Curriculum that introduces trainees to these four aspects of speech and hearing. The program draws upon the combined expertise of the faculties of Boston area institutions, including the Harvard Medical School, MIT, Boston University and the Massachusetts General Hospital Institute of Health Professions (MGH-IHP). To date, nearly 140 students have graduated with a PhD from SHBT. Trainees have diverse undergraduate backgrounds in the physical, engineering, biological or cognitive sciences, including some with traditional speech and hearing backgrounds and AuD degrees. Training combines coursework and research rotations for the first two years after which it concentrates on dissertation research, with the PhD degree expected after 5 to 6 years. The coursework and research training combines a broad exposure to the many scientific disciplines relevant to speech and hearing together with a deep understanding of the student's chosen research area. An immersive clinical exposure at Massachusetts Eye and Ear is a highlight of the didactic training program. Special attention is given to issues of integrity and responsible conduct of research as well as training in methods to enhance reproducibility in research. A unique collaboration with the MGH-IHP allows interested trainees to meet the requirements for clinical certification in speech-language pathology through classes and clinical placements at this institution. Our ability to recruit trainees from underrepresented minorities has significantly increased over the past five years. These efforts are being further enhanced through the recent appointment of a faculty Director of Diversity, Equity and Inclusion, changes in admission procedures aimed at greater equity, and increased recruiting activities. A vast majority of our 140 graduates are pursuing research or research-related careers in health care, and half of these have primary activities in the speech and hearing sciences. Many have faculty positions in basic science, engineering, and clinical departments and are leading impactful research programs and successfully competing for research grants. Some are combining research careers with clinical practice in otology, neurology, audiology or speech- language pathology. Some are taking leadership roles in industries related to speech and hearing or in the broader biotechnology field where they are developing assistive devices for communication disorders and drug therapies for hearing loss.

