

**Mark Perry**

August 23, 2022 at  
10:05 AM

TO: [ocr.seattle@ed.gov](mailto:ocr.seattle@ed.gov)

Dear Seattle Office for Civil Rights:

This is a federal civil rights complaint vs. the **Oregon Health and Science University** (University) for its illegal race-based discrimination in violation of Title VI. Specifically, the University operates the racially discriminatory [GME-to-Faculty Diversity Advancement Pathway \(FDAP\)](#) that restricts eligibility to only those junior medical faculty who are **(a) Black or African American, (b) Hispanic or Latino/a (individual of any gender identity originating from Mexico, Central or South America, or Caribbean cultures), (c) American Indian or Alaska Native, and (d) Native Hawaiian or Other Pacific Islander.**

At the [application link for the discriminatory program](#), the racially discriminatory eligibility restrictions are restated as follows:

Eligibility: The AAMC provides the following definition: "Underrepresented in medicine means those racial and ethnic populations that are underrepresented in the medical profession relative to their numbers in the general population." At OHSU, we define under-represented in medicine as including persons from racial or ethnic groups that are under-represented in medicine and biomedical sciences, including: **(a) Black or African American, (b) Hispanic or Latino/a (individual of any gender identity originating from Mexico, Central or South America, or Caribbean cultures), (c) American Indian or Alaska Native, and (d) Native Hawaiian or Other Pacific Islander.**

In violation of Title VI, junior medical faculty who are not members of one of those four designated racial/ethnic groups above in bold e.g., non-eligible junior medical faculty who are white, Middle Eastern (e.g., Iranian, Turkish, Israeli, Arab, Armenian, etc.), Asian Indian, Chinese, Taiwanese, Japanese, Vietnamese, Thai, Korean, Malaysian, Burmese, Laotian, Korean, Pakistani, Cambodian, Filipino, Sri Lankan, Malaysian, Singaporean, Laotian, Bangladeshi, Indonesian and all other Asian junior faculty are illegally excluded from the University's "GME-to-Faculty Diversity Advancement Pathway (FDAP)" program and illegally discriminated against on the basis of their race, color, and national origin. Please investigate the University for illegal race-based discrimination in violation of Title VI.

Professor (Em.) Mark J. Perry, University of Michigan  
Senior Fellow *Do No Harm*