From: Mark Perry

Date: Fri, Sep 2, 2022 at 2:35 PM

Subject: Please Investigate the Medical University of South Carolina for Violating Title

VI and Title IX

To: OCR DC < OCR.DC@ed.gov >

Dear DC Office for Civil Rights:

This is a federal civil rights complaint vs. the **Medical University of South Carolina** (University) for illegal race-based discrimination in violation of Title VI and illegal sex-based discrimination in violation of Title IX. Specifically, the University operates the following discriminatory programs:

1. The <u>Underrepresented in Medicine (URM) Visiting Student Program</u> as the program name indicates is a discriminatory program that illegally discriminates against a significant number of medical students. The program's website provides this evidence of race-based discrimination (bold added): "The goal of this program is to recruit talented 4th-year **URM students** to MUSC who have met all requirements for visiting student rotations listed in VSLO. The program provides support for **Black/African American, Native American, Hispanic, and Pacific Islander** students participating in a variety of rotations throughout MUSC."

In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in bold including non-eligible medical students 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 medical students are illegally excluded from the University's "URM Visiting Student Program" and illegally discriminated against on the basis of their race, color, and national origin.

- 2. The University's racially discriminatory <u>Jenny and Jerry Reves, M.D. Diversity</u> <u>Scholarship</u> is a \$2 million endowment that awards scholarships to promising **underrepresented in medicine (URM) students** who are accepted into the College of Medicine." In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in bold (**Black/African American**, **Native American, Hispanic, and Pacific Islander**) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.
- 3. The discriminatory <u>University's Rose Delores Gibbs, M.D. Endowed Scholarship</u> is "awarded to a current **female URM student**, preferably one who plans to practice

Family Medicine or Internal Medicine." In violation of Title IX, all male students are illegally excluded from this scholarship. In violation of Title VI, female medical students who are not members of one of the four designated racial/ethnic groups above in bold (Black/African American, Native American, Hispanic, and Pacific Islander) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.

- 4. The University's racially discriminatory <u>Coastal Community Foundation Thaddeus Bell, M.D. Scholarship</u> is "awarded annually to an outstanding **URM student** in one of the six colleges at MUSC. Although not strictly limited to the College of Medicine, medical students are strongly encouraged to apply." In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in bold (**Black/African American, Native American, Hispanic, and Pacific Islander**) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.
- 5. The University's racially discriminatory Student Diversity Transition Forum is for "First (1st) year underrepresented in medicine medical students and their families are invited to a transition forum before starting medical school. During this forum, students meet Dean's Office administrators, their instructors, other key personnel, as well as their peer mentors. The Student National Medical Association presents at this meeting to give incoming students an overview of the organization." In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in bold (Black/African American, Native American, Hispanic, and Pacific Islander) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.
- 6. The University's racially discriminatory <u>Mentoring Ensures Medical School Success</u> (<u>MEMS</u>) provides "College of Medicine **under-represented in medicine students** with a faculty mentor who will assist students to excel academically, emotionally, socially and professionally." In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in

bold (**Black/African American, Native American, Hispanic, and Pacific Islander**) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.

7. The University's racially discriminatory Student Ambassadors & Peer Mentors program assigns "Second (2nd) year under-represented in medicine students to first (1st) year under-represented in medicine students entering the College of Medicine. The mentors provide first-hand information about negotiating one's way academically and socially through the first year of medical school, as well as resources such as books, notes, etc." In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in bold (Black/African American, Native American, Hispanic, and Pacific Islander) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.

8. The University's racially discriminatory Residency Selection Forum is described as follows: "MEMS facilitators, current residents and the Associate Dean for Graduate Medical Education meet with 4th year underrepresented in medicine medical students to prepare them for the residency interview process." In violation of Title VI, medical students who are not members of one of the four designated racial/ethnic groups above in bold (Black/African American, Native American, Hispanic, and Pacific Islander) including non-eligible medical students 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 medical students are illegally excluded from this scholarship and illegally discriminated against on the basis of their race, color, and national origin.

Please investigate the University for multiple violations of Title VI and one violation of Title IX.

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