

**From:** Mark Perry

**Sent:** Friday, October 14, 2022 4:28 PM

**To:** 'OCR San Francisco' <[OCR.SanFrancisco@ed.gov](mailto:OCR.SanFrancisco@ed.gov)>

**Subject:** Please Investigate the University of California San Francisco

Dear San Francisco OCR:

This is a federal civil rights complaint vs. the University of California San Francisco (University) for illegal race-based discrimination in violation of Title VI. Specifically, the University operates, hosts, and promotes “Race-Based Caucusing” groups (in the University’s own words) that separate the University’s medical residents and fellows on the basis of race, color, and national origin in segregated “[Racial Affinity Caucusing Groups](#) (RACG).” From the program’s website (bold added):

RAGC (sic) recognizes that the work that **Black, Indigenous and People of Color (BIPOC)** are doing to process, heal, and dismantle racism is different from the work that (sic) **white people** need to do. This article explains the importance of having **protected [segregated] spaces for people to process.**

Note that there are separate RACGs for (a) People Who Identify as Black/African American, (b) People Who Identify as People of Color, and (c) People Who Identify as white.

According to Title VI specific discriminatory actions prohibited include:

ii) Providing any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program on the basis of race or color.

(iii) Subject an individual on the basis of race or color to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; ‘

(v) Treat an individual differently from others on the basis of race or color in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program;

In violation of Title VI, the University’s RAGCs are treating individuals differently by segregating and separating on the basis of race and color. Please investigate the University for illegal race-based discrimination in violation of Title VI.

Professor (Em.) Mark J. Perry, University of Michigan