

From: Mark Perry

Sent: Monday, February 27, 2023 4:55 PM

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

Subject: Please Investigate 12 Schools for Promoting and Hosting Events for an External, Third-Party Program That Discriminates on the Basis of Sex in Violation of Title IX

Dear Office for Civil Rights:

This is a joint federal civil rights complaint against 12 schools listed below that use their resources to advertise, promote, host, and partner with an external third-party organization – **The Perry Initiative** – that openly discriminates on the basis of sex in violation of Title IX. In **Section A** below, details of the discriminatory organization and its programs are provided. In **Section B** below, evidence is provided that demonstrates the 12 schools' promotion, hosting, and partnering with the discriminatory programs described in Section A (bold highlight added).

1. Oklahoma School of Science and Mathematics
2. Yale University
3. Wake Forest University
4. New York University
5. University of New Mexico
6. University of Pittsburgh
7. Duke University
8. Albert Einstein College of Medicine
9. University of Arizona
10. University of Iowa
11. Oregon Health and Science University
12. University of Virginia

A. The Perry Initiative: Building the Pipeline for **Women in Engineering and Medicine**

1. The [Perry Outreach Program](#) (POP) is a one-day career exploration for **young women in high school** who are interested in careers in orthopaedic surgery, engineering or both.

Who is the POP for? **Applicants must gender-identify as female or nonbinary** and be in high school.

2. The [Perry Initiative Medical Student Outreach Program](#) is a hands-on introduction to the field of Orthopaedic Surgery for **women in medical school**.

Who is the MSOP for? **Participants must gender-identify as female or nonbinary** and currently be in medical school (MD or DO).

As the eligibility requirements clearly indicate, these two programs operate exclusively for individuals who identify as female or nonbinary and exclude individuals who do not identify as female or nonbinary and discriminate against them on the basis of their sex and gender identity.

B. Schools that Participate and Partner with the Perry Initiative: Oklahoma School of Science and Mathematics, Yale University, Wake Forest University, New York University, the University of New Mexico, University of Pittsburgh, Duke University, Albert Einstein College of Medicine, University of Arizona, University of Iowa, Oregon Health and Science University, and University of Virginia

Information is provided below regarding the 12 schools that host and partner with the Perry Initiative, including hosting and promoting Perry Initiative programs on their campuses, by date (all dates are in 2023).

1. [January 27](#): We are pleased to announce a Medical Student Outreach Program on January 27, 2023, which will take place at the **Oklahoma School of Science and Mathematics** in Oklahoma City, OK. See the [program flyer here](#).
2. [January 28](#): We are pleased to announce a Perry Outreach Program in Oklahoma City, OK which will take place at **the Oklahoma School of Science and Mathematics** on January 28, 2023. See the [program flyer here](#).
3. [February 24](#): We are pleased to announce a Medical Student Outreach Program on February 24, 2023, which will take place at **Yale University** in New Haven, CT. See the [program flyer here](#).
4. [February 25](#): We are pleased to announce a Perry Outreach Program in New Haven, CT which will take place at **Yale University** on February 25, 2023. See the [program flyer here](#).
5. [March 18](#): We are pleased to announce a Perry Outreach Program in Winston Salem, NC which will take place at **Wake Forest University School of Medicine** on March 18, 2023. See the [program flyer here](#).

See this [Wake Forest University website promoting its partnership with the Perry Initiative](#).

6. [March 24](#): We are pleased to announce a Medical Student Outreach Program on March 24, 2023, which will take place at **New York University** in New York, NY. See the [program flyer here](#).
7. [March 25](#): We are pleased to announce a Perry Outreach Program in New York, NY which will take place at **New York University** on March 25, 2023. See the [program flyer here](#).

8. [April 1](#): We are pleased to announce a Perry Outreach Program in Rio Rancho, NM which will take place at the **University of New Mexico** on April 1, 2023. See the [program flyer here](#). See this recent evidence of the University's promotion of the "[Perry Initiative for high school girls coming to UNM on April 1](#)" – "Attracting **more young women** into the fields of orthopedic medicine and engineering is the goal of the [Perry Outreach Program](#), and once again, The University of New Mexico will be hosting the one-day, hands-on workshop this spring [2023]."
9. [April 1](#): We are pleased to announce a Perry Outreach Program in Pittsburgh, PA which will take place at the **University of Pittsburgh** on April 1, 2023. See the [program flyer here](#).
10. [April 1](#): We are pleased to announce a Medical Student Outreach Program on April 1, 2023, which will take place at **Duke University** in Durham, NC. See the [program flyer here](#). Evidence is provided [here from May 2022](#) showing Duke's direct involvement and partnership with the Perry Initiative.
11. [April 21](#): We are pleased to announce a Medical Student Outreach Program on April 21, 2023, which will take place at the **Albert Einstein College of Medicine** in New York, NY. See the [program flyer here](#).
12. [April 22](#): We are pleased to announce a Perry Outreach Program in Tucson, AZ which will take place at the **University of Arizona**, Tucson on April 22, 2023. See the [program flyer here](#). Evidence is [provided here of the University's promotion of the Perry Initiative](#).
13. [May 12](#): We are pleased to announce a Medical Student Outreach Program on May 12, 2023, which will take place at the **University of Iowa** in Iowa City, IA. See the [program flyer here](#).
14. [May 13](#): We are pleased to announce a Perry Outreach Program in Iowa City, IA which will take place at the **University of Iowa** on May 13, 2023. See the [program flyer here](#).
15. [May 13](#): We are pleased to announce a Perry Outreach Program in Indianapolis, IN which will take place at **Indiana University** on May 13, 2023. See the [program flyer here](#).
16. [June 3](#): We are pleased to announce a Perry Outreach Program in Portland, OR which will take place at **Oregon Health & Science University** on June 3, 2023. See the [program flyer here](#).
17. [June 3](#): We are pleased to announce a Medical Student Outreach Program on June 3, 2023, which will take place at the **University of Virginia** in Charlottesville, VA. See the [program flyer here](#).

Please note that each program flyer for each event displays the University host prominently, see the example below for the University of Iowa flyer. The hosting on its campuses and the use of the university names to promote the event indicate the University’s partnership and promotion of an organization and its programs that clearly discriminate on the basis of sex and gender identity. Please also note that every flyer for each event listed above provides exclusionary language confirming sex discrimination, e.g., “Applicants **must gender-identify or non-binary** and be in high school,” see example below. Also note that the program flyers show 100% female participants, see example below.



**THE PERRY
INITIATIVE**

**PERRY
OUTREACH PROGRAM**



AN OPPORTUNITY TO
REALIZE YOUR POTENTIAL



The Perry Initiative inspires young women to be leaders in Orthopaedic Surgery and Engineering by partnering with medical centers, universities and high schools nationwide.



Apply to participate in this free, one-day event. Explore hands-on surgery modules and receive mentorship from women surgeons and engineers. Applicants must gender-identify as women or nonbinary and be in high school.

IOWA CITY, IA

MAY 13, 2023

University of Iowa

Application Deadline 4/12/23

Institutional COVID-related protocols at the time of the event will be observed.

PARTICIPATE in hands-on workshops
LEARN from engineers and surgeons



APPLY ONLINE NOW

<https://perryinitiative.org/pop-application/>

In violation of Title IX, the 12 schools and universities above are active partners with The Perry Initiative, which discriminates on the basis of sex, and they host and participate in events on their campuses that are offered exclusively for females. Please investigate the 12 schools above for violating Title IX by partnering with and hosting female-only events on their campuses.

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