



UNITED STATES DEPARTMENT OF EDUCATION OFFICE FOR CIVIL RIGHTS

Administrative Complaint

February 6, 2023

United States Department of Education
Office for Civil Rights
One Petticoat Lane
1010 Walnut St., 3rd Floor, Suite 320
Kansas City, MO 64106

Via Email: OCR.KansasCity@ed.gov

To Whom It May Concern:

This is a federal civil rights complaint under the U.S. Department of Education's Office for Civil Rights' discrimination complaint resolution procedures.

Do No Harm brings this complaint against **Washington University in St. Louis Institute for Public Health** (University) for discrimination on the basis of race in programs that receive federal financial assistance in violation of Title VI of the Civil Rights Act of 1964.

Do No Harm makes this complaint as an interested third-party organization that opposes racial discrimination in American medical schools and healthcare organizations.

This complaint is regarding the University's **Summer Research Diversity Program In Cardiovascular Disease and Hematology (RADIANCE) program**. According to the [university's website](#):

Participants must meet one or more of the following categories:

- *Individuals from racial and ethnic groups who are underrepresented in health-related sciences on a national basis**
- *Individuals with disabilities*
- *Individuals from disadvantaged backgrounds*

The following racial and ethnic groups have been shown to be underrepresented in biomedical research: **Blacks or African Americans, Hispanics or Latinos, American Indians or Alaska Natives, Native Hawaiians and other Pacific Islanders.*

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

Although students from the four designated racial and ethnic groups -- Blacks or African Americans, Hispanics or Latinos, American Indians or Alaska Natives, Native Hawaiians and other Pacific Islanders -- automatically qualify for the RADIANCE program on the basis of their race, color or national origin, students of non-preferential groups (Whites, Asians and Middle East/North Africans) can only qualify if they are disabled or disadvantaged, which puts those non-preferential groups at a significant disadvantage and treats them differently on the basis of their race, color or national origin in violation of Title VI.

Supporting evidence includes the [promotional flyer](#):

Institute for Public Health Summer Research Program CARDIOVASCULAR DISEASE & HEMATOLOGY



Students in our *new* Summer research Diversity Program in Cardiovascular Disease & Hematology (RADIANCE) track learn about the broad scope of heart and blood disorders and their interdisciplinary and multidimensional impact.



LEARN FROM EXPERTS
Engage in lectures and group discussions about clinical trials, research ethics, and more



GAIN REAL-WORLD EXPERIENCE
Work alongside a mentor in a lab setting



PRESENT YOUR WORK
Give a capstone presentation during your final week of the program

ELIGIBILITY

- Must meet one or more of the following categories:
 - racial and ethnic groups who are underrepresented in health-related sciences on a national basis*
 - individuals with disabilities
 - individuals from disadvantaged backgrounds
- Must be an undergraduate or health professional student actively enrolled in an accredited university or accredited health professional school

**Including Black or African American, Hispanic or Latino, American Indian or Alaska Native, Native Hawaiian and other Pacific Islander. For more information on qualifications visit bit.ly/3grXhAE.*

Apply today: publichealth.wustl.edu/summer

Application period opens: October 14, 2022 | Program period: June 5-July 28, 2023

Accepted students receive a stipend and, if needed, support for travel to and from St. Louis and lodging while enrolled.
Non-WashU students receive a Metrolink transit pass.

Additional supporting evidence comes from an email sent by a coordinator in the University's Institute for Public Health:

Good afternoon,

On behalf of Dr. [Victor-Davila Roman](#), Director of the Global Health Center at Washington University in St. Louis, I am reaching out to let you know we are currently accepting applications for our [2023 RADIANCE Summer Program](#), which will provide an enriching experience specifically in the areas of Cardiovascular Disease (CVD) and Hematologic Disorders.

This 8-week program features lectures on topics related to CVD and hematologic disorders in addition to cross-cutting major biomedical research topics such as epidemiology, biostatistics, clinical trials, implementation science, data science, research ethics and includes a comprehensive mentoring, career development and research training curriculum. Students also receive a stipend to assist with expenses such as travel and housing.

To be eligible for this program, students must be an undergraduate or health professional student actively enrolled in an accredited university or health professional school and must have successfully completed at least one undergraduate year or one quarter or semester at a health professional school.

Applicants must represent one (or more) of the following attributes to be eligible to apply:

- From a racial/ethnic group that is traditionally underrepresented in health-related [sciences](#)
- From disadvantaged background(s)
- With disabilities

More specific information about these requirements can be found at the following link: [NOT-OD-20-031: Notice of NIH's Interest in Diversity](#)

I am writing to ask if you would be willing to disseminate this information for us to your contacts and any students who may be interested in applying.

And please let me know if there is someone else in your office who may be more appropriate or available to tackle this with.

Kind regards,



The [application link](#) for the discriminatory program provides additional evidence that race/ethnicity are considerations for eligibility:

**2023 Summer Research Diversity Program in
Cardiovascular Disease & Hematology
RADIANCE**

Application Form

Race

American Indian/Alaska Native

Asian

Black/African American

Native Hawaiian/Other Pacific Islander

White/Caucasian

Intentionally withheld

Please select which of the following program eligibility requirements applies to you. (May select more than one requirement if both are applicable.)

From racial and ethnic group that has been shown by the National Science Foundation to be underrepresented in health-related sciences on a national basis (See #2 listed under eligibility requirements)

Defined as having a physical or mental impairment that substantially limits one or more major life activities, as described in the Americans with Disabilities Act of 1990

From a disadvantaged background that meets two or more of the applicable criteria (See #4 listed under eligibility requirements)

A woman from one or more of the above criteria facing particular challenges at the graduate level and beyond in scientific fields (Select all above that apply)

None of these requirements apply to me

Please investigate the University for illegal race-based discrimination in violation of Title VI.

Thank you for your prompt assistance with this request for investigation and resolution. Please contact me for further information.

Sincerely,



Laura L. Morgan MSN, RN
Program Manager, Do No Harm