

**From:** Mark Perry

**Sent:** Thursday, September 7, 2023 12:24 PM

**To:** [officeofthechancellor@umassmed.edu](mailto:officeofthechancellor@umassmed.edu); [gleone@umassp.edu](mailto:gleone@umassp.edu)

**Cc:** [dbarton@umassp.edu](mailto:dbarton@umassp.edu); [bwburke@umass.edu](mailto:bwburke@umass.edu); [gleone@umassp.edu](mailto:gleone@umassp.edu); [prism.research@umassmed.edu](mailto:prism.research@umassmed.edu); [David.McManus@umassmed.edu](mailto:David.McManus@umassmed.edu)

**Subject:** FW: Please Investigate UMass Chan Medical School for Illegal Discrimination in Violation of Title VI

Dear General Counsel Leone and Chancellor Collins:

Below is a courtesy copy of the federal civil rights complaint that I filed yesterday with the Boston Office for Civil Rights against the UMass Chan Medical School for illegal race-based discrimination in violation of Title VI.

In addition to violating Title VI's explicit prohibition of race-based discrimination, the PRISM program's discrimination also violates your [university's Non-Discrimination Statement](#):

The University of Massachusetts, Amherst **prohibits discrimination on the basis of race, color**, religion, caste, creed, sex, age, marital status, **national origin**, mental or physical disability, political belief or affiliation, pregnancy and pregnancy-related condition(s), veteran status, sexual orientation, gender identity and expression, genetic information, natural and protective hairstyle and any other class of individuals protected from discrimination under state or federal law in any aspect of the access to, admission, or treatment of students in its programs and activities, or in employment and application for employment.

How does the University of Massachusetts reconcile its stated commitment to non-discrimination with the PRISM program that illegally restricts eligibility based on race, color, or national origin?

While the Boston Office for Civil Rights evaluates my Title VI complaint against the University of Massachusetts perhaps your General Counsel Office could conduct a parallel legal review of this discriminatory and legally indefensible program, which may have not been evaluated for legal compliance with Title VI before [it was launched last year](#).

To quote US Civil Rights Commissioner Peter Kirsanow, there are no "unless you have good intentions" exceptions to Title VI. Race-based discrimination is still unlawful even if it advantages the "right" races for the "right" reasons. It is a clear violation of Title VI that the UMass Chan Medical School, a recipient of federal funds, is illegally excluding certain students from the PRISM program and discriminating against them based on their race, color, or national origin.

Based on my experience filing more federal civil rights complaints against US colleges and universities (864) than any individual in history for more than 2,000 violations of Title VI and Title IX, it is my opinion that the OCR will require you to remove the race-

based restrictions for the PRISM program to correct your current non-compliance of Title VI that violates your legal obligation to actively enforce all federal civil rights laws (including Title VI) as a condition of continuing to access federal funds.

Prof. (em.) Mark J. Perry, Ph.D., University of Michigan  
Senior Fellow, Do No Harm

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Please Investigate UMass Chan Medical School for Illegal Discrimination in Violation of Title VI

**Mark Perry**

Sep 6, 2023,  
1:17 PM

to OCR

Dear Boston OCR:

This is a federal civil rights complaint against UMass Chan Medical School (School) in Worcester, Massachusetts, for illegal racial discrimination in violation of Title VI. Specifically, the School (a recipient of federal funds) operates, offers, hosts, funds, administers, and promotes the racially discriminatory [Pipeline for underRepresented Students in Medicine \(PRISM\)](#), a program that “introduces undergraduate and post-graduate students from diverse backgrounds that are **traditionally underrepresented in medicine** to clinical research and healthcare opportunities.” According to the [Program website](#),

Eligibility Criteria: **Must be a member of historically underrepresented groups** in medicine e.g., **Blacks, Mexican Americans, Native Americans (American Indians, Alaska Natives, and Native Hawaiians), and of Hispanic origin** (see screenshot below).

## Eligibility Criteria

- Must be a member of historically underrepresented groups in medicine.
  - e.g., Blacks, Mexican Americans, Native Americans (American Indians, Alaska Natives, and Native Hawaiians), and of Hispanic origin.

In violation of Title VI, the School’s PRISM program illegally excludes and discriminates against certain students based on their race, color, or national origin including students who are white, Pacific Islander, Asian (Chinese, Taiwanese, Japanese, Hmong, Thai, Laotian, Vietnamese, Pakistani, Indian, Sri Lankan, Bangladeshi, Filipino, Indonesian, Burmese, Korean, etc.) or Middle Eastern/North African (from Algeria, Bahrain, Egypt, Israel, Jordan, Kuwait, Libya, Morocco, Oman, Qatar, Saudi Arabia, Tunisia, United

Arab Emirates, etc.). Please investigate the School for illegal discrimination based on race/ethnicity in violation of Title VI.

Professor (em.) Mark J. Perry, Ph.D., University of Michigan  
Senior Fellow, Do No Harm