



**Do No Harm**

2825 E. Cottonwood Parkway, Suite 500  
Salt Lake City, UT 84121

March 30, 2026

VIA ELECTRONIC MAIL: [OCRCComplaint@hhs.gov](mailto:OCRCComplaint@hhs.gov)

U.S. Department of Health and Human Services  
Office for Civil Rights  
Hubert H. Humphrey Bldg.  
200 Independence Avenue, SW  
Washington, DC 20201-0004

**Re: Complaint Under Title VI and the ACA Against Corewell Health,  
Texas Tech University, and HCA Healthcare - National Origin  
Discrimination in Residency Programs**

To whom this may concern:

Pursuant to Title VI of the Civil Rights Act of 1964 and Section 1557 of the Affordable Care Act (ACA), Do No Harm files this complaint against three healthcare providers: Corewell Health, Texas Tech University (Texas Tech), and HCA Healthcare. Each of these entities runs a residency program in internal medicine, all of which appear to strongly favor foreign-trained over American-trained doctors.<sup>1</sup> Indeed, in all three of these programs' most recent cohorts of residents, more than 90% of residents come from abroad.

National origin discrimination is illegal. Indeed, it is antithetical to the American ethos and is “so seldom relevant to the achievement of any legitimate [interest] that [it is] presumed to reflect invidious discrimination.” *ACLU of Kansas & W. Missouri v. Praeger*, 863 F. Supp. 2d 1125, 1132 (D. Kan. 2012). As hospital systems and medical institutions that receive public funds, Corewell Health, Texas Tech, and HCA Healthcare are subject to Title VI. And under Title VI, they cannot use national origin

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<sup>1</sup> Corewell Health offers an internal medicine residency program at its Dearborn Hospital, located at 18101 Oakwood Blvd., Dearborn, MI 48124. Texas Tech University's internal medicine residency program is provided through its Health Sciences Center, located at 3601 4th St., Lubbock, TX 79430. HCA Healthcare's Florida-based division offers an internal medicine residency program at Brandon Hospital, located at 119 Oakfield Dr., Brandon, FL 33511.

“as a factor” in awarding residency opportunities. *Smith v. Liberty Mut. Ins. Co.*, 395 F. Supp. 1098, 1100 (N.D. Ga. 1975). “Simple justice requires that public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes, or results in [such] discrimination.” *Barbour v. WMATA*, 374 F.3d 1161, 1170 (D.C. Cir. 2004).

The Affordable Care Act likewise guarantees that healthcare opportunities will not be doled out on the basis of the country one calls home. 42 U.S.C. §18116(a). Illegal and discriminatory medical residency programs “not only violate the text and spirit of our longstanding federal civil-rights laws,” but “they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement.” *Ending Illegal Discrimination and Restoring Merit-Based Opportunities*, Exec. Order 14173, §1 (Jan. 21, 2025).

This Office has the statutory authority and responsibility to investigate and remedy violations of Title VI and the ACA by healthcare providers that accept federal funds. *See* 45 C.F.R. §§80.3, 80.7. Do No Harm respectfully requests that the Office open an investigation into the internal medicine residency programs at Corewell Health’s Dearborn Hospital, Texas Tech University, and HCA Healthcare’s Brandon Hospital.

**I. Internal medicine residency programs at Corewell Health, Texas Tech, and HCA Healthcare appear to strongly favor foreigners over American-trained doctors.**

Residency programs represent “a crucial phase in a physician’s training.” AMAFoundation, *What is residency?*, perma.cc/Y9C3-SBEE (archived Mar. 24, 2026). Immediately following medical school, these programs are “intensive, full-time job[s]” where newly-minted physicians learn their craft and “are trained to provide complex differential diagnoses, formulate treatment plans considering multiple organ systems[,] and interpret tests in the context of a patient’s overall health.” *Id.* Each of the internal medicine residency programs at Corewell Health, Texas Tech, and HCA Healthcare is an example of these valuable, competitive, and prestigious opportunities. These gateways to the medical profession ought to be open to all physicians, no matter what nation they call home. But these programs appear to pervasively discriminate against American-trained physicians.

Indeed, these programs reveal a consistent pattern. Each has excluded practically all American-trained physicians from its residency. Each has filled its cohorts almost

exclusively with residents trained in a small set of foreign countries. And each is headed-up by directors that mirror the residents they choose: foreign-trained physicians educated in or near the small set of foreign countries from which these residencies fill their ranks.

The internal medicine program at Corewell Health in Dearborn, Michigan, for example, currently has 33 residents. *See* Corewell Health, *Meet Our Residents*, [perma.cc/R4BX-CD53](https://perma.cc/R4BX-CD53) (archived Mar. 24, 2026). Only one attended an American medical school. *Id.* That alone is powerful evidence of a de facto policy of national origin discrimination. But, in addition to this, the 97% of residents who did not attend an American medical school are not evenly distributed. Indeed, 84% of that set received their medical educations in a small number of foreign countries: Nine of those residents are from Sudan, eight are from Pakistan, four are from Jordan, and others hail from Palestine, Bahrain, Iraq, and Saudi Arabia. *Id.* The director of the Corewell program attended medical school in Lebanon.

The Corewell program is not alone. Indeed, even Corewell's eye-popping statistic—97% of residents trained in foreign medical schools—is not unique. Consider the internal medicine residency at Texas Tech University. That program has 39 residents. *See* Texas Tech University, *Resident Profiles*, [perma.cc/EEA4-NDEF](https://perma.cc/EEA4-NDEF) (archived Mar. 24, 2026). But 95% were hired from foreign medical schools. *Id.* And once again, the majority come from a discrete set of foreign countries: eight hail from Pakistan, five from Bangladesh, two each from Egypt, Iraq, and United Arab Emirates, and others from Saudi Arabia, Sudan, Syria, and elsewhere. *Id.* Further following the Corewell model, the directors of this residency program both attended medical school in Iraq.

The internal medicine program at HCA Healthcare's Brandon Hospital in Florida is cut from the same cloth. That residency program has 58 total residents. *See* Instagram, *HCABrandonIMResidency*, [perma.cc/39M5-WG7L](https://perma.cc/39M5-WG7L) (archived Mar. 24, 2026). Of that set, more than 70% trained in foreign medical schools. *Id.* Even more shocking, in the most recent cohort of residents, *not a single one* trained in the United States. *Id.* Each and every resident attended medical school abroad, and once again these residents hail overwhelmingly from a small set of foreign countries. Fifteen residents come from Pakistan, three from Libya, and others from Iraq, Jordan, Syria, and Turkey, among other countries. *Id.* The HCA Brandon program is under the direction of Mohammad Said Saad, who received his medical training in Egypt, and Syed Zaidi, who trained in Pakistan.

It is true that approximately 25% of all residents come from foreign medical schools—a separately concerning issue that is symptomatic of physician training shortages across American medical schools. See The Harvard Gazette, *How immigrant doctors fill critical gap in U.S. healthcare system*, [perma.cc/PA5F-LPXP](https://perma.cc/PA5F-LPXP); American Immigration Council, *Fewer Foreign Doctors Could Spell Disaster for America’s Most Underserved Communities*, [perma.cc/Y3DS-96M8](https://perma.cc/Y3DS-96M8). Nevertheless, the fact remains that the three residency programs at Texas Tech, Corewell Health, and HCA Healthcare exhibit a marked, and sometimes total exclusion, of American-trained physicians, pointing to additional, intentional selective pressures aimed at achieving increased numbers of physicians from foreign nations.

## **II. National origin or race discrimination in these residency programs violates federal law.**

Residency programs that selectively favor foreign doctors over American physicians on the basis of nationality or race are discriminatory in violation of Title VI. Under Title VI, “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. §2000d.

The aforementioned residency programs are “program[s] or activit[ies]” under Title VI because they are “operations” of their respective institutions. 42 U.S.C. §2000d-4a(1). Further, each of those institutions takes federal funds. See, e.g., GovTribe, *Corewell Health*, [perma.cc/H3Y2-QH76](https://perma.cc/H3Y2-QH76) (archived Mar. 24, 2026); Texas Tech University, *Funding Opportunities*, [perma.cc/TC7J-YNL5](https://perma.cc/TC7J-YNL5) (archived Mar. 24, 2026); HCA Healthcare, *2024 Annual Report to Shareholders 7*, [perma.cc/GWF3-B2PP](https://perma.cc/GWF3-B2PP) (archived Mar. 25, 2026). Finally, the behavior of these programs—including hiring cohorts without a single physician trained in America—suggests that these programs have caused and will continue to cause American doctors to be “excluded from participation in,” “denied the benefits of,” or “subjected to discrimination” “on the ground of race, color, or national origin.” 42 U.S.C. §2000d. These residency programs thus likely violate Title VI.

Likewise, national origin and race discrimination are also unlawful under the Affordable Care Act. Section 1557 of the ACA incorporates Title VI’s prohibitions on race and national origin discrimination in “any health program or activity, any part of which is receiving Federal financial assistance.” 42 U.S.C. §18116(a). The conduct

of these residency programs may thus constitute an independent violation of the ACA.<sup>2</sup>

Residency programs with such highly imbalanced hiring patterns warrant further scrutiny. This Office has a duty to investigate and remedy any such discrimination, and it should consider referring the matter to the Department of Justice for further or concurrent action.

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For all these reasons, Do No Harm requests that the Office for Civil Rights open an investigation into the residency programs at Corewell Health, Texas Tech, and HCA Healthcare.

Sincerely,



Kristina Rasmussen  
Executive Director



Cara Tolliver  
Vice President of Legal Programs

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<sup>2</sup> The national origin discrimination in which these residency programs engage—privileging doctors from foreign countries—could just as well suggest racial discrimination. See *Bullard v. OMI Georgia, Inc.*, 640 F.2d 632, 634 (5th Cir. 1981) (Sometimes “national origin” discrimination is so closely related to racial discrimination as to be indistinguishable.”). Thus, the at-issue residency programs may violate Title VI’s and ACA’s prohibitions on national origin discrimination and/or race discrimination. In addition, these residency programs may also violate Title VII’s anti-discrimination provisions and 42 U.S.C. §1981. See *Short v. Mando Am. Corp.*, 805 F. Supp. 2d 1246, 1267 (M.D. Ala. 2011) (“[E]vidence of national origin discrimination may be highly relevant to whether or not racial discrimination in violation of §1981 occurred.”).