



THE EQUAL PROTECTION PROJECT
A Project of the Legal Insurrection Foundation
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BY EMAIL (OCRComplaint@hhs.gov)

Centralized Case Management Operations
U.S. Department of Health and Human
Services
200 Independence Avenue, S.W.
Room 509F HHH Bldg.
Washington, D.C. 20201

BY EMAIL (Paula.Stannard@hhs.gov)

Paula Stannard, Esq.
Director, Office for Civil Rights
U.S. Department of Health and Human
Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: Civil Rights Complaint Against Oregon Health and Science University
Regarding Discriminatory Programming and Scholarships

Dear Director Stannard and HHS OCR Staff:

This is a federal civil rights complaint pursuant to the U.S. Health and Human Services' Office for Civil Rights ("OCR") discrimination complaint resolution procedures.¹ We write on behalf of the Equal Protection Project of the Legal Insurrection Foundation, a non-profit that, among other things, seeks to ensure equal protection under the law and non-discrimination by the government, and that opposes discrimination in any form.

We bring this civil rights complaint against Oregon Health and Science University ("OHSU") for its administration and promotion of six (6) programs and scholarships which discriminate based on race, color, and/or national origin, in violation of Title VI of the Civil

¹ See 42 U.S.C. § 2000d-1; 45 C.F.R. §§ 80.7, 80.8, and 80.10.

Rights Act of 1964 (“Title VI”), the Fourteenth Amendment’s Equal Protection Clause, U.S. Const. amend. XIV, § 1 (“Equal Protection Clause”) and Section 1557 of the Affordable Care Act (“Section 1557”).² This pervasive discrimination in health care programs and services necessitates HHS action to enforce the non-discrimination laws. Moreover, these programs and scholarships violate state discrimination laws³ as well as those of OHSU.⁴

As detailed in *Students for Fair Admissions v. Harvard*, 600 U.S. 181 (2023), race-based classifications in education and training are subject to strict scrutiny. Programs that explicitly or effectively prioritize applicants from certain racial or ethnic groups while excluding or disadvantaging others (e.g., “underrepresented in medicine” preferences that operate as proxies for race) violate civil rights laws. This includes scholarships, diversity-focused residencies, fellowships, mentoring programs, and “pathway” initiatives that use racial criteria for eligibility, scoring, or selection. Programs that automatically qualify some racial or ethnic groups (e.g., “underrepresented minorities”) while requiring other groups to show additional factors (such as economic disadvantage) impose unlawful discriminatory standards.

Equal access to medical education and training should be based on individual merit, qualifications, and potential to serve patients — not racial group membership. Discriminatory practices undermine public trust in medicine, fairness, and the integrity of the healthcare workforce undermining HHS’s nondiscrimination requirements and policy goals.

Programs and Scholarships that Violate Title VI and the Affordable Care Act Section 1557⁵

Oregon Health & Science University (OHSU) offers numerous programs which discriminate on the basis of race under the pretext of giving preferences to or promoting services as intended for “minority” students or similar racial and ethnic classifications.⁶

1. Jump Start Program

According to the OHSU website, “Jump Start is designed for post-baccalaureate scholars to gain research experience and professional skills needed for acceptance to graduate school and to thrive in a professional research career. This program is seeking individuals who are

² 42 U.S.C. § 18116; 45 C.F.R. pt. 92 (2024).

³ Oregon Revised Statutes § 659.850 (2025).

⁴ <https://www.ohsu.edu/sites/default/files/2024-11/Respect%20for%20All%202024.pdf>

⁵ Discriminatory criteria highlighted. All links were active as of the time of this filing.

⁶ Unless a distinction favoring Native Americans is based on tribal membership, citizenship, or a similar affiliation in a federally recognized tribe, and the preference involves “uniquely Indian interests,” such as Native American lands or treaties, *Doe v. Kamehameha Schs./Bernice Pauahi Bishop Est.*, 470 F.3d 827, 880 (9th Cir. 2006) (en banc), allocating preferences to Native Americans “as a discrete racial group” is subject to the same legal scrutiny as any other racial classification, *Morton v. Mancari*, 417 U.S. 535, 554 (1974). These exceptions do not apply to this programming or scholarships.

traditionally underrepresented in research (i.e. those who identify as minorities, have a disability, are from a rural environment, identify as LGBTQ+, are low income, are houseless, or are first generation college students). No previous research or lab experience required”.⁷

Link: <https://www.ohsu.edu/outreach/higher-education-programs> (Last accessed May 18, 2026)

Archived Link: archive.is/wip/401BC

Discriminatory Requirement: “This program is seeking individuals who are traditionally underrepresented in research (i.e. those who identify as **minorities**, have a disability, are from a rural environment, identify as LGBTQ+, are low income, are houseless, or are first generation college students).”

Jump Start Research Training

Jump Start is designed for post-baccalaureate scholars to gain research experience and professional skills needed for acceptance to graduate school and to thrive in a professional research career.

This program is seeking individuals who are traditionally underrepresented in research (i.e. those who identify as minorities, have a disability, are from a rural environment, identify as LGBTQ+, are low income, are houseless, or are first generation college students). No previous research or lab experience required.

The program includes a stipend, and it goes for eight consecutive weeks from mid-June through mid-August. It is considered a full-time position with about 40 hours per week divided between the lab (30-35 hours) and professional skills sessions (5-10 hours).

Participants will be paired with a faculty mentor from OHSU Casey Eye Institute, and will receive training on conducting research, working in a lab, scientific writing, presenting a poster, and more.

Program details:

- **When:** Summer
- **Eligibility:** Underrepresented post-baccalaureate scholars
- **Contact:** Mary Kelley, ✉ kelleyma@ohsu.edu

⁷ Courts understand the term “minority” to mean non-white racial and ethnic groups. *See Boston Chapter, NAACP, Inc. v. Beecher*, 295 F. Supp. 3d 26, 28 (D. Mass. 2018); see also *Kirkland v. N.Y. State Dep’t of Corr. Servs.*, 552 F. Supp. 667, 674, 677 (S.D.N.Y. 1982); *Arbor Hill Concerned Citizens Neighborhood Ass’n v. Cnty. of Albany*, 281 F. Supp. 2d 436, 455 (N.D.N.Y. 2003); *Coalition to Defend Affirmative Action, Integration and Immigrant Rights and Fight for Equality by Any Means Necessary v. Regents of Univ. of Mich.*, 701 F.3d 466, 493 (6th Cir. 2012).

2. Equity Research Program

The OHSU Equity Research Program offers an exciting opportunity for diverse undergraduate college students to spend eight weeks working on research projects alongside faculty, scientists and graduate students. Examples of internship tracks include: Biomedical Studies; Dental; Medicine; Public Health.

Link: <https://www.ohsu.edu/diversity-equity-inclusion-belonging/equity-research-program> (Last accessed May 18, 2026).

Archived Link: archive.is/wip/FMM3i

Discriminatory Requirement: “You come from *either* an **underrepresented minority** group; have experienced economic hardship; are first in your family to attend college; have experienced other economic, educational, ethnic/cultural, family circumstance hardships; or a student with disability”.⁸

Who's eligible to apply?

You qualify if you meet the following criteria:

- Have completed at least one undergraduate college year by the start date of the program.
- Have completed at least one course in the basic sciences (some tracks require a lab component) and mathematics or statistics.
- You come from *either* an underrepresented minority group; have experienced economic hardship; are first in your family to attend college; have experienced other economic, educational, ethnic/cultural, family circumstance hardships; or a student with disability.
 - Economically disadvantaged students are defined as individuals who come from a low-income family, using low income levels specified by the U.S. Department of Health and Human Services as a guideline. Socially disadvantaged students come from an environment that may inhibit them from obtaining knowledge, skills or abilities required to enroll and successfully complete an undergraduate or graduate course of study that could lead to a career in the health sciences. This category includes, but is not restricted to, students whose parents did not attend or complete college.

3. Center for Learner Diversity and Inclusion

The Center for Learner Diversity and Inclusion creates programs to advance the academic, career and personal development of underrepresented minority and disadvantaged

⁸ <https://www.ohsu.edu/diversity-equity-inclusion-belonging/equity-research-program>. (archive.is/wip/FMM3i) (Last visited 5/18/2026).

students. We offer academic advising to prospective students interested in OHSU academic programs.


Link: <https://www.ohsu.edu/diversity-equity-inclusion-belonging/connect-cldi> (Last accessed May 18, 2026).

Archived Link: archive.is/wip/IB201

Discriminatory Requirement: “The Center for Learner Diversity and Inclusion creates programs to advance the academic, career and personal development of **underrepresented minority** and disadvantaged students.”

Connect with CLDI

The Center for Learner Diversity and Inclusion creates programs to advance the academic, career and personal development of underrepresented minority and disadvantaged students. We offer academic advising to prospective students interested in OHSU academic programs.



4. On Track OHSU!

On Track OHSU! is a centrally staffed program which performs outreach to Oregon high schools and middle schools with the specific goal of increasing the numbers of underrepresented minority students in scientific research and medical careers. This program provides opportunity for students and faculty at OHSU to engage with students across the state of Oregon.

Link: <https://www.ohsu.edu/school-of-medicine/cell-developmental-and-cancer-biology/track-ohsu-program> (Last accessed May 18, 2026).

Archived Link: archive.is/wip/a4Dn6

Discriminatory Requirement: “...with the specific goal of increasing the numbers of **underrepresented minority students** in scientific research and medical careers.”

On Track OHSU! Program

On Track OHSU! is a centrally staffed program which performs outreach to Oregon high schools and middle schools with the specific goal of increasing the numbers of underrepresented minority students in scientific research and medical careers. This program provides opportunity for students and faculty at OHSU to engage with students across the state of Oregon.

5. Pay it Forward Mentorship Program

Link: <https://www.ohsu.edu/school-of-medicine/md-program/pay-it-forward-mentorship-program> (Last accessed May 18, 2026).

Archived Link: archive.is/wip/eWymw

Discriminatory Requirement: “Persons from **racial or ethnic groups that are underrepresented** in medicine and biomedical sciences: (a) **Black or African American**, (b) **Hispanic or Latino/a/e** (individual of any gender identity originating from Mexico, Central or South America, or Caribbean cultures), (c) **American Indian or Alaska Native**, and (d) **Native Hawaiian or Other Pacific Islander.**”

Pay It Forward Mentorship Program

Pay It Forward is a medical student-run mentorship program. The School of Medicine Undergraduate Medical Education (UME) and OASIS (Outreach, Advising, Support and Identity formation for Students) fund the program. The program aims to pair current medical students with undergraduate mentees from diverse and underrepresented backgrounds to create a more equitable workforce, increase cultural competence, and reduce health disparities. Members of the Pay It Forward Student Interest Group will determine matches as identified by their application profile, interests, specialty of medicine, etc.



**PAY IT
FORWARD**
MENTORSHIP PROGRAM



Our application cycle is currently closed. Please check back in Fall 2026 for updates regarding both mentor and mentee applications.

Eligibility

Mentors: Current OHSU medical students who support diversity, equity and inclusion and are willing to mentor and guide diverse students along their journey of applying to medical school.

Mentees: Diverse undergraduate students pursuing a career in medicine will be paired with a current OHSU medical student through one or more academic years for guidance throughout medical school. Diverse individuals include, but not limited to:

- o Persons from racial or ethnic groups that are under-represented in medicine and biomedical sciences: (a) Black or African American, (b) Hispanic or Latino/a/e (individual of any gender identity originating from Mexico, Central or South America, or Caribbean cultures), (c) American Indian or Alaska Native, and (d) Native Hawaiian or Other Pacific Islander.
- o Persons from rural environments, defined as the majority of childhood years in a frontier environment or rural town as specified by the Oregon Office of Rural Health (i.e., a town of less than or equal to 40,000 population and at least 10 miles from a community of that size or larger.)
- o Persons who have experienced significant disadvantage or adversity (i.e., a first-generation college graduate; a recipient of social service resources while in elementary or secondary school, enhanced education or other programs for diverse populations; or by experience of economic, cultural, educational or family adversity.)

6. HealthE STEPS - Nursing Workforce Diversity Scholarships

The program provides financial assistance to nursing students in our undergraduate bachelor's degree programs and graduate programs annually.

Scholarships are available to OHSU Nursing students in our graduate program, OCNE 3 Year Program on all five campuses, Accelerated Baccalaureate Program on both campuses, and student in the on-campus BS completion program.

The program provides academic and social support to scholarship and stipend recipients in the form of case management, mentoring, and other services.

Grant funds are used for community outreach to minority populations, with the goal of recruiting them to the nursing workforce; and to support minority nursing students through retention initiatives so that they can successfully complete their study program.

Link: <https://www.ohsu.edu/school-of-nursing/health-steps-nursing-workforce-diversity>
(Last accessed May 18, 2026).

Archived Link: archive.is/wip/gI9jy

Discriminatory Requirement: "Applicant also needs to meet one of the following criteria: **Underrepresented minorities** in nursing (**racial or ethnic minorities**)"

Scholarship Eligibility Information

Applicants must be a citizen of the United States, a non-citizen national of the United States, or a foreign national with a visa permitting permanent residence in the United States. Applicant also needs to meet one of the following criteria:

- Underrepresented Minorities in Nursing (e.g., ethnic/racial minorities)
- Educational Disadvantaged (e.g., neither parent graduated from a 4-year university, grew up in a rural town with limited school resources)
- Economically Disadvantaged (e.g., low EFC, economic hardship)

To be eligible for scholarship awards or stipends, applicants must also participate in the following activities:

The Challenged Programs and Scholarships Violate the Law.

The programs and scholarships identified above violate Title VI and the Equal Protection Clause by discriminating on the basis of race, skin color, or national origin.⁹ Furthermore, because these programs and scholarships involve the education of health care professionals such discrimination also violates Section 1557 of the ACA.

Title VI

Title VI prohibits intentional discrimination on the basis of race, color, or national origin in any “program or activity” that receives federal financial assistance. *See* 42 U.S.C. § 2000d. The term “program or activity” encompasses “all of the operations ... of a college, university, or other postsecondary institution, or a public system of higher education.” *See* 42 U.S.C. § 2000d-4a(2)(A). As noted in *Rowles v. Curators of the University of Missouri*, 983 F.3d 345, 355 (8th

⁹ Unless a distinction favoring Native Americans is based on tribal membership, citizenship, or a similar affiliation in a federally recognized tribe, and the preference involves “uniquely Indian interests,” such as Native American lands or treaties, *Doe v. Kamehameha Schs./Bernice Pauahi Bishop Est.*, 470 F.3d 827, 880 (9th Cir. 2006) (en banc), allocating preferences to Native Americans “as a discrete racial group” is subject to the same legal scrutiny as any other racial classification, *Morton v. Mancari*, 417 U.S. 535, 554 (1974). These exceptions do not apply to this programming or scholarships.

Cir. 2020), “Title VI prohibits discrimination on the basis of race in federally funded programs,” and therefore applies to universities receiving federal financial assistance. Because OHSU receives federal funds, including funding from Health and Human Services and the National Institutes of Health (“NIH”) they are subject to Title VI.¹⁰

Regardless of OHSU’s reasons for offering, promoting, and administering the programs and scholarships’ discriminatory eligibility requirements, they are violating Title VI by doing so. It does not matter if the recipient of federal funding discriminates in order to advance a benign “intention” or “motivation.” *Bostock v. Clayton Cnty.*, 590 U.S. 644, 661 (2020) (“Intentionally burning down a neighbor’s house is arson, even if the perpetrator’s ultimate intention (or motivation) is only to improve the view.”); accord *Automobile Workers v. Johnson Controls, Inc.*, 499 U.S. 187, 199 (1991) (“the absence of a malevolent motive does not convert a facially discriminatory policy into a neutral policy with a discriminatory effect” or “alter [its] intentionally discriminatory character”). “Nor does it matter if the recipient discriminates against an individual member of a protected class with the idea that doing so might favor the interests of that class as a whole or otherwise promote equality at the group level.” *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181, 289 (2023) (Gorsuch, J., concurring).

Equal Protection Cause of the Fourteenth Amendment

As OHSU is a public entity, its offering, promoting, and administering these discriminatory scholarships also violates the Equal Protection Clause of the Fourteenth Amendment. In *Students for Fair Admissions*, the Supreme Court declared that “[e]liminating racial discrimination means eliminating all of it The guarantee of equal protection cannot mean one thing when applied to one individual and something else when applied to a person of another color. If both are not accorded the same protection, then it is not equal.” *Id.* at 206 (cleaned up). “Distinctions between citizens solely because of their ancestry [including race] are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.” *Id.* at 208. Consequently, “[a]ny exception to the Constitution’s demand for equal protection must survive a daunting two-step examination known ... as strict scrutiny.” *Id.* at 208 (internal quotation marks and citation omitted). The scholarships at issue here cannot withstand that exacting standard.

Under strict scrutiny, suspect classifications “are constitutional only if they are narrowly tailored measures that further compelling governmental interests.” *Adarand Constructors, Inc. v. Pena*, 515 U.S. 200, 227 (1995). It is the government that bears the burden to prove “that the reasons for any [racial] classification [are] clearly identified and unquestionably legitimate.” *Richmond v. J. A. Croson Co.*, 488 U.S. 469, 505 (1989). Here, OHSU cannot carry its burden.

¹⁰See https://www.usaspending.gov/award/ASST_NON_U24GM129547_075 (<https://archive.is/C4bFh>) (Last accessed May 18, 2026.)

A “racial classification, regardless of purported motivation, is presumptively invalid and can be upheld only upon an extraordinary justification.” *Shaw v. Reno*, 509 U.S. 630, 643–44 (1993) (citation omitted). Here, OHSU cannot demonstrate that restricting scholarships based on race, color, or national origin serves any legitimate governmental purpose, let alone an extraordinary one. Classifications based on immutable characteristics “are so seldom relevant to the achievement of any legitimate state interest” that government policies “grounded in such considerations are deemed to reflect prejudice and antipathy—a view that those in the burdened class are not as worthy or deserving as others.” *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 440 (1985).

The Supreme Court has recognized only two interests compelling enough to justify racial classifications. The first is remedying the effects of past de jure segregation or discrimination in the specific industry and locality at issue, where the government played a role. The second is “avoiding imminent and serious risks to human safety in prisons, such as a race riot.” *Students for Fair Admissions*, 600 U.S. at 207 (citation omitted). Neither applies here.

If OHSU’s programs and scholarships are intended to achieve racial balance, such an objective has been “repeatedly condemned as illegitimate” and “patently unconstitutional” by the Supreme Court. *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 726, 730 (2007) (“Accepting racial balancing as a compelling state interest would justify the imposition of racial proportionality throughout American society, contrary to our repeated recognition that at the heart of the Constitution’s guarantee of equal protection lies the simple command that the Government must treat citizens as individuals, not as simply components of a racial, religious, sexual, or national class”) (cleaned up, citation omitted).

Further, a policy is not narrowly tailored if it is either overbroad or underinclusive in its use of racial classifications. *J.A. Croson Co.*, 488 U.S. at 506. Indeed, in *Students for Fair Admissions*, the Supreme Court found that similar categories as those used to determine eligibility for OHSU’s programs and scholarships were “imprecise,” “plainly overbroad,” “arbitrary,” “undefined” and “opaque,” 600 U.S. at 216-17,¹¹ and declared that “it is far from evident ... how assigning students to these ... categories and making admissions decisions based on them furthers the educational benefits that the universities claim to pursue.” *Id.* at 216.

For a policy to satisfy narrow tailoring, the government must demonstrate “serious, good faith consideration of workable race-neutral alternatives,” *Grutter*, 539 U.S. at 339, and show that “no workable race-neutral alternative” could achieve the purported compelling interest. *Fisher v. Univ. of Tex. at Austin*, 570 U.S. 297, 312 (2013). There is no evidence that such alternatives were ever considered here.

OHSU’s explicit race-based programs and scholarships are presumptively invalid, and since there is no compelling government justification for such invidious discrimination, OHSU’s

¹¹ In his concurrence, Justice Thomas criticizes these categories as being “artificial.” *Students for Fair Admissions*, 600 U.S. at 276 (Thomas, J., concurring).

offering, promotion, and administration of these programs and scholarships violate state and federal civil rights statutes and constitutional equal protection guarantees.

ACA Section 1157

Section 1557 of the Affordable Care Act (ACA) “prohibits discrimination on the basis of race, color, national origin, sex, age, and disability in certain health programs and activities. Section 1557 provides that, except as otherwise provided in title I of the ACA, an individual shall not, on the grounds prohibited under title VI of the Civil Rights Act of 1964, title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, or section 504 of the Rehabilitation Act of 1973, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any health program or activity, any part of which is receiving Federal financial assistance, including credits, subsidies, or contracts of insurance, or under any program or activity that is administered by an executive agency or any entity established under title I of the ACA. This part applies to health programs or activities administered by recipients of Federal financial assistance from the Department, Department-administered health programs or activities, and title I entities that administer health programs or activities”.¹² OHSU’s health research and education programs and scholarships for health care professionals are such activities. This includes funding from the HHS for programs that provide education and research for health care professionals. The nondiscrimination requirements apply broadly, covering “all of the operations of any entity principally engaged” in administering or providing these types of health initiatives.¹³ Clearly the programs and scholarship at issue here focused on health education fall under this broad ACA protection.

OHSU is Oregon’s only public health academic center. It is a system of hospitals and clinics across Oregon and Southwest Washington State. It is an institution of learning, with schools of medicine, nursing, dentistry and public health with a network of campuses and partners throughout Oregon.¹⁴ OHSU is therefore subject to the prohibitions of Sec. 1557 of the Affordable Care Act.

¹² 89 Fed. Reg. 37692 (May 6, 2024). [1]

¹³ 45 C.F.R. § 92.4; 89 Fed. Reg. 37522, 37542 (May 6, 2024) (“As stated throughout this section, if any part of a health program or activity receives Federal financial assistance and the entity administering said health program or activity is principally engaged as provided in paragraph (2), then all the operations of the recipient are subject to the rule.”). OHSU is engaged in the provision of health programs, health education for healthcare professionals and students, including the performance, research, and administration of health services. *See* <https://www.ohsu.edu/about> (<https://archive.is/GfHDy>) (Last accessed May 18, 2026). Further, OHSU is a recipient of federal HHS funding. https://www.usaspending.gov/award/ASST_NON_U24GM129547_075 (<https://archive.is/C4bFh>) (Last accessed May 18, 2026)

¹⁴ <https://www.ohsu.edu/about> (<https://archive.is/GfHDy>) (Last visited May 18, 2026).

OHSU's explicit race, ethnicity, and/or national origin eligibility requirements are presumptively invalid, and their offering, promotion, and administration of these programs also violates Sec. 1557 Of the Affordable Care Act.

HHS OCR Has Jurisdiction

OHSU receives federal HHS funding. It is subject to Title VI and Section 1557, and HHS OCR therefore has jurisdiction over this complaint.

Request For Investigation And Enforcement

In *Richmond v. J. A. Croson Co.*, Justice Scalia aptly noted that “discrimination on the basis of race is illegal, immoral, unconstitutional, inherently wrong and destructive of a democratic society.” 488 U.S. 469, 505 (1989) (citation omitted). This is true regardless of which race suffers – discrimination against white applicants is just as unlawful as discrimination against black or other non-white applicants. As Justice Thomas correctly noted in *Students for Fair Admissions*, race-based admissions preferences “fly in the face of our colorblind Constitution and our Nation’s equality ideal” and “are plainly – and boldly – unconstitutional.” 600 U.S. at 287 (Thomas, J., concurring).

Because the discrimination outlined above is presumptively illegal, and OHSU cannot show any compelling government justification for it, the fact that they condition eligibility on race, color, or national origin violates Title VI, the Equal Protection Clause and the Affordable Care Act.

HHS OCR has the power and obligation to investigate OHSU's role in creating, funding, promoting, and administering these programs and scholarships and to impose whatever remedial relief is necessary to hold them accountable for that unlawful conduct. This includes, if necessary, imposing fines, initiating administrative proceedings to suspend or terminate federal financial assistance and referring the case to the Department of Justice for judicial proceedings to enforce the rights of the United States under federal law. After all, “[t]he way to stop discrimination ... is to stop discriminating[.]” *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007).

Accordingly, we respectfully ask that the Department of Health and Human Services promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from these programs and scholarships based on discriminatory criteria, and ensure that all ongoing and future programming and scholarships at OHSU comport with federal civil rights laws.

Respectfully submitted,

/William A. Jacobson/
William A. Jacobson, Esq.
President

U.S. Dept. of Health and Human Services, Office for Civil Rights
Civil Rights Complaint Against Oregon Health and Science University
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Page 13 of 13

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