



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Office for Civil Rights

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August 27, 2026

Maureen S. Riordan
Chief Counsel
Equal Protection Project
18 Maple Avenue, #280
Barrington, RI 02806

Transmitted via email only: m.riordan@legalinsurrection.com

Re: Equal Protection Project vs Thomas Jefferson University
OCR Transaction Number: 26-689559

Dear Maureen S. Riordan:

On June 18, 2026, the U.S. Department of Health and Human Services (HHS), Office for Civil Rights (OCR)¹ received a complaint from the Equal Protection Project (the Complainant) alleging that Thomas Jefferson University (TJU) is in violation of Title VI of the Civil Rights Act of 1964 (Title VI)², and/or Section 1557 of the Patient Protection and Affordable Care Act (Section 1557).³

Specifically, the complaint alleges that TJU engages in unlawful discrimination on the bases of race, color, and national origin in violation of Title VI and Section 1557 in its operation and promotion of five scholarships (identified programs). These identified programs include the following four scholarships offered by the Sidney Kimmel Medical College (SKMC): (1) The Jackson-Minton Scholarship;⁴ (2) The Visiting Medical Student Diversity Scholarship;⁵ (3) The Otolaryngology Research Fellowship Scholarship;⁶ and

¹ OCR enforces Federal civil rights laws that prohibit discrimination in the delivery of health and human services based on race, color, national origin, disability, age, sex, religion, and the exercise of conscience. OCR also enforces the Health Insurance Portability and Accountability Act (HIPAA) Privacy, Security, and Breach Notification Rules and 42 C.F.R. Part 2 (Confidentiality of Substance Use Disorder Patient Records).

² 42 United States Code (U.S.C.) §§ 2000d *et seq.*, and its implementing regulations at 45 Code of Federal Regulations (C.F.R.) Part 80.

³ 42 U.S.C. § 18116, as implemented by 45 C.F.R. Part 92.

⁴ <https://giving.jefferson.edu/content/oia-2019/giving-guide/give/jackson-minton-scholarship.html>.

⁵ <https://www.jefferson.edu/academics/colleges-schools-institutes/skmc/departments/rehabilitation/programs/visiting-medical-student-diversity-scholarship.html>.

⁶ <https://www.jefferson.edu/academics/colleges-schools-institutes/skmc/departments/otolaryngology/diversity.html>.

(4) The Visiting Medical Student Scholarship for Inclusive Excellence.⁷ The identified programs also include one scholarship offered through TJU's College of Rehabilitation Sciences (CRS): (1) The Dominique "Rem'mie" Fells Scholarship.⁸

OCR is responsible for investigating complaints of discrimination against recipients of Federal financial assistance (FFA) through HHS and for ensuring the compliance of those recipients with various civil rights regulations that OCR enforces. OCR has determined that it has jurisdiction over your allegations pursuant to the regulations listed above. Title VI prohibits discrimination on the basis of race, color, or national origin. Additionally, OCR enforces Section 1557, which provides that an individual shall not be excluded from participation in, be denied the benefits of, or be subjected to discrimination under certain health programs and activities on the grounds prohibited under certain laws, including race, color, and national origin. Section 1557 and its implementing regulations apply to health programs and activities administered by HHS.

Therefore, OCR will initiate an investigation. When OCR has reached a determination regarding your complaint, we will advise you of our findings.

Additionally, the complaint also identified The Dominique "Rem'mie" Fells Scholarship as supporting transgender and gender non-conforming students.⁹ Please be aware that while OCR will investigate this scholarship for discrimination based on race, color, or national origin, it will not investigate the gender aspect of this scholarship.

Pursuant to orders by various federal courts, certain provisions of the final rule implementing Section 1557 were stayed or enjoined. Specifically, in *Texas v. Becerra*, No. 6:24-cv-211-JDK (E.D. Tex. August 30, 2024), the court stayed 45 C.F.R. § 92.101(a)(2), among other provisions, in its entirety nationwide.¹⁰ That subsection states that discrimination on the basis of sex includes "(i) Sex characteristics, including intersex traits; (ii) Pregnancy or related conditions; (iii) Sexual orientation; (iv) Gender identity; and (v) Sex stereotypes." Accordingly, on the basis of the above federal court orders, OCR will not be investigating the gender portion of your complaint.

⁷ <https://www.jefferson.edu/academics/colleges-schools-institutes/skmc/departments/emergency-medicine/education/visiting-student-inclusive-excellence-scholarship.html>.

⁸ <https://www.jefferson.edu/alumni/get-involved/alumni-groups/ot-alumni-network.html>.

⁹ <https://www.jefferson.edu/alumni/get-involved/alumni-groups/ot-alumni-network.html>.

¹⁰ In *Texas v. Becerra*, the court stayed nationwide the following regulations: 42 C.F.R. §§ 438.3(d)(4), 438.206(c)(2), 440.262, 460.98(b)(3), 460.112(a); 45 C.F.R. §§ 92.101(a)(2) (and all references to this subsection), 92.206(b), 92.207(b)(3)–(5).

If you have any questions about this matter, please contact the Investigator assigned to your complaint, [REDACTED]
[REDACTED] When contacting this office, please remember to include the transaction number referenced above that we have given this file.

Sincerely,



For
Jamie Rahn Ballay
Regional Manager