



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20530

May 6, 2026

VIA E-mail to: debo.adegbile@wilmerhale.com

Debo P. Adegbile
Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007

Re: United States' May 9, 2025 Title VI Inquiry Findings

Dear Mr. Adegbile:

We write to notify you of the findings of the U.S. Department of Justice (the Department) after its compliance review to determine whether the admissions practices of the University of California, Los Angeles (UCLA) David Geffen School of Medicine (DGSOM) are in compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. ("Title VI"),¹ as interpreted by the Supreme Court's decision in *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College*, 600 U.S. 181 (2023) ("*Harvard*"). Based on our review, we have found that DGSOM has violated this standard by discriminating on the basis of race in the incoming classes of 2023, 2024, and 2025. Based on its review of DGSOM's documents and data, **the Department finds that DGSOM continues to intentionally discriminate against applicants based on their race after the Supreme Court's decision in *Harvard* by granting and denying admission on the basis of race.**

Procedural Background

The Department enforces federal civil rights laws that protect students from discrimination, including Title VI, which prohibits recipients of federal financial assistance from discrimination based on race and ethnicity.

Title VI authorizes the Department to conduct periodic compliance reviews and investigations of the practices and policies of the recipients of federal funding. 28 C.F.R. § 42.107. Should the Department find that a recipient fails to comply with Title VI, it is authorized to pursue legal action to secure compliance. *See* 28 C.F.R. §§ 42.105 & 108.

¹ This investigation is separate and distinct from the Department's investigations related to allegations of discrimination against Jewish and Israeli students and allegations of employment discrimination.

The Department currently provides direct federal financial assistance to UCLA.² Enforcement under Title VI requires funding agencies to advise recipients of their failure to comply, and to determine that compliance cannot be obtained by voluntary means before initiating judicial proceedings to compel compliance. 42 U.S.C. § 2000d-1. If the Department determines that the noncompliance with Title VI cannot be corrected by voluntary means, the Department may seek to compel compliance through enforcement. *See* 28 C.F.R. § 42.108.

The Department's May 9th notice of investigation letter included a request for information. On September 16, 2025, the Department sent a Supplemental Request for Information. DGSOM responded to these requests with documents. The Department has carefully reviewed the documents DGSOM produced and collected other information in its investigation of DGSOM, which forms the basis of the Department's findings.

Intent to Discriminate

DGSOM's internal policies, publicly distributed literature, and email correspondence of its leadership, consistently and emphatically **demonstrate DGSOM's intent to use race in admissions decisions despite the *Harvard* ruling.**

In one example, Alisa Lopez (DGSOM's Executive Director of Admissions) sent a document prepared by the American Association of Medical College (AAMC) to Jennifer Lucero (Associate Dean of Admissions). Lopez stated that the document "may be helpful for the Admissions Committee members as a resource" and suggested distributing it to them.³ This document outlines workarounds to achieve medical school "diversity goals," despite the prohibition on race preferences articulated in *Harvard*. Such workarounds include racial proxies and emphasizing "holistic review practices" as bases for admitting students.⁴ Discrimination on the basis of racial proxies is offensive to our nation's Constitution and laws, just as direct racial discrimination is.⁵ "[W]hat cannot be done directly cannot be done indirectly. The Constitution deals with substance, not shadows, and the prohibition against racial discrimination is levelled at the thing, not the name."⁶ The document also promotes a theory that increasing "diversity" of the healthcare workforce will improve healthcare outcomes for Black and Hispanic patients, with the implication that denying Black and Hispanic students admission to medical school now will injure and kill Black and Hispanic patients in the future.⁷

The Executive Director of Admissions' promotion of this document demonstrates DGSOM's intent to racially discriminate under the guise of saving lives and conceal her true motive to treat certain applicants unfavorably based on their race. Her plan to distribute this document to admissions staff shows that these attitudes were systemically ingrained in DGSOM's admissions department and put into practice at every level.

² Grant Nos. 15PJDP-24-GK-01652-MUMU and 15JOVW-24-GG-01523-MUMU, totaling \$1,992,200.

³ September 1, 2023 email from Alisa Lopez; DGSOMAD-DOJ-00001265

⁴ "Frequently Asked Questions: What Does the Harvard and UNC Decision Mean for Medical Education?" dated August 24, 2023; DGSOMAD-DOJ-00001271

⁵ *See Rice v. Cayetano*, 528 U.S. 495, 514–15 (2000).

⁶ *Students for Fair Admissions*, 600 U.S. at 230–31.

⁷ "Frequently Asked Questions: What Does the Harvard and UNC Decision Mean for Medical Education?" dated August 24, 2023; DGSOMAD-DOJ-00001274

DGSOM requires applicants to take the AAMC’s PREview Exam, a multiple-choice test. The PREview Exam was created by diversity-affairs officers from various medical schools, to “level the playing field” for applicants deemed historically underrepresented in medicine. It does so by stressing subjective factors other than academics. The PREview Exam scores initially get reported to DGSOM as part of the applicant’s primary application. DGSOM again asks about the PREview Exam in the secondary application. The secondary application asks the applicant to submit several open-ended responses. For instance, in 2024 and 2025, DGSOM asked a series of questions, including asking whether applicants identify as being part of a marginalized group, with a follow up question about the impact.^{8,9} **By design, this question asks Black and Hispanic applicants to reveal their race so that DGSOM can know and consider it.**

In *Harvard*, the UC System submitted an amicus brief stating that it “implemented numerous and wide-ranging race-neutral measures designed to increase ... racial diversity.” In a memo entitled “Guiding Principles for Student Representation,” DGSOM states that the Chairs of the Admissions Committee “will review all submitted recommendations to ensure representation from those who identify as BIPOC...” for selection of students for participation in the Admissions Committee. This statement did not change for the 2022 to 2024 enrollment cycles.¹⁰ DGSOM appears to have changed this document in May 2025 for the 2025 enrollment cycle to remove this language.¹¹

The updated 2025 admissions guidance presentation has several slides with only graphics that discuss issues such as “implicit bias” and promoting diversity. This suggests that admissions personnel are given verbal instructions during this presentation encouraging the use of race/ethnicity in admissions, and such instructions are not put in writing.¹² The 2025 admissions prep materials, which continue to refer to “race” in its holistic metrics model,¹³ state that *Harvard* endorses holistic review, and includes unconscious bias training.¹⁴

DGSOM uses AAMC’s holistic metrics model, as shown on the wheel graphic available at <https://students-residents.aamc.org/media/5781/download>. This graphic was featured in DGSOM’s 2025 admissions guidance document. It shows a myriad of factors that appear unrelated to medicine to explain what a holistic admission process considers, including “citizenship,” “distance travelled,” “relationship status,” “cultural events,” and “sexual orientation.” In addition to these attributes, the wheel explicitly includes “race” and “national origin”, both of which are prohibited by Title VI. Blown-up excerpts of these portions of the wheel are shown on the following page. DGSOM has taken the view that by performing a holistic evaluation of applicants

⁸ “DGSOM Traditional MD Secondary Mock-up” 2025 Cycle; DGSOMAD-DOJ-00000995

⁹ “DGSOM Admissions Committee KICKOFF” dated September 18, 2024; DGSOMAD-DOJ-00000342, *et seq.*

¹⁰ “Admissions Committee Guiding Principles for Student Representation,” 22-23, 23-24, 24-25, and 25-26 admissions cycles; DGSOMAD-DOJ-00000141 to 00000144

¹¹ “Admissions Committee Guiding Principles for Student Representation,” updated 25-26 admissions cycle; DGSOMAD-DOJ-00000145

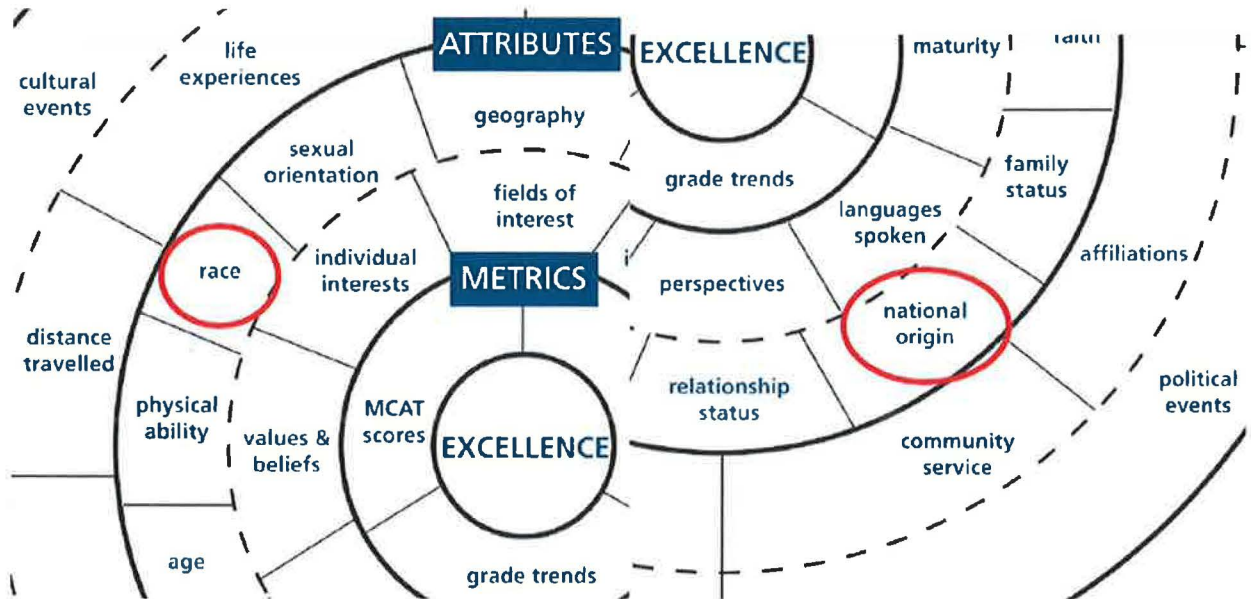
¹² “DGSOM Admissions Committee KICKOFF” dated September 18, 2024; DGSOMAD-DOJ-00000323 to 00000327

¹³ “DGSOM Admissions Committee KICKOFF” dated September 18, 2024; DGSOMAD-DOJ-00000316

¹⁴ “DGSOM Admissions Committee KICKOFF” dated September 18, 2024; DGSOMAD-DOJ-00000320, DGSOMAD-DOJ-00000324

(i.e., considering the factors on the wheel), it has achieved more racial diversity in its admitted students.¹⁵

DGSOM has maintained that it takes a “holistic” approach to admissions, and that objective metrics like MCAT scores and GPAs are only part of what it considers in evaluating applicants. DGSOM justifies this approach by emphasizing that it takes more than academic excellence to make a great physician. This does not explain the major disparities it has produced in objective academic metrics between racial groups.



The expected result of a reduced emphasis on these academic metrics (without illegal racial preferences) would be a reduction in MCAT/GPA scores for all racial groups by roughly equal amounts. Absent a stereotyped view of racial differences, one would expect that each racial group would excel roughly equally in the non-academic application metrics in the holistic evaluation model. This greater emphasis on non-academic metrics would result in lower academic metrics across the board, as students that excel in areas other than MCAT/GPA are accepted in similar proportions from all racial groups.

DGSOM’s holistic approach instead results in significantly lower median MCAT/GPA scores for Black and Hispanic students compared with other groups. This result relies on a stereotyped assumption that Black and Hispanic students disproportionately excel in these non-academic metrics. In fact, DGSOM’s admissions department promotes such stereotypes, and has promulgated literature stating that more Black and Hispanic doctors are needed to alleviate health disparities between Black and Hispanic patients and the population as a whole. In *Harvard*, the Supreme Court repeatedly warned that racial considerations in admissions “may not operate as a stereotype.”¹⁶

DGSOM uses its holistic-review procedure to uncover and then use applicants’ race through direct and indirect means. The secondary application asks questions designed to uncover

¹⁵ “DGSOM Admissions Committee KICKOFF” dated September 18, 2024; DGSOMAD-DOJ-00000316

¹⁶ *Harvard*, 600 U.S. at 218.

applicants' race. The interviews further enable the committee to know applicants' race and ethnicity. Race preferences elevate Black and Hispanic applicants in the admissions process. Admission to Geffen is a highly selective, zero-sum process. Any benefit given to "some applicants but not to others necessarily advantages the former group at the expense of the latter." *Harvard*, 600 U.S. at 219. Lucero in particular used intimidation and shaming tactics to pressure the admissions committee to unlawfully consider race in their decisions—including forcing them to sit through a two-hour lecture by her sister, Stephanie Lucero.

Statistical Evidence of Intentional Discrimination

DGSOM has produced aggregated admissions data showing disparities in MCAT scores and GPAs between different racial groups of admitted students. For example, DGSOM provided a chart showing the Median GPA and MCAT scores broken down by racial category for its 2023 incoming class, as summarized in the following chart. MCAT scores are shown as the test score, followed by the percentile rank in parentheses among all test-takers that year:¹⁷

Race	Median GPA	Median MCAT	
		Score	Percentile ¹⁸
Black	3.63	507	68
Asian	3.81	514	88
Hispanic	3.55	507	68
White	3.75	514	88
Two or More Races	3.78	513	86
Declined to Respond	3.79	519	96

The Median MCAT scores in this chart show significant differences across racial lines. The lowest group median scores (Black and Hispanic) are at the 68th percentile of test takers, while those who declined to respond were at the 96th percentile. This is 28 percentile points (about 1 standard deviation) of difference between these two groups.¹⁹ The GPAs also show a large disparity, with the lowest group median GPA (Hispanic) being 0.26 grade points lower than the highest group median GPA (Asian).

DGSOM also provided a chart showing the Median GPA and MCAT scores broken down by racial category for its 2024 incoming class, as summarized in the following chart:²⁰

Race	Median GPA	Median MCAT	
		Score	Percentile ²¹
Black	3.72	508	72
Asian	3.84	515	90
Hispanic	3.56	506	66

¹⁷ Aggregated AAMC Data for DGSOM Applicants (2021-2024 Admissions Cycles); DGSOMAD-DOJ-00000745

¹⁸ <https://students-residents.aamc.org/media/13381/download>

¹⁹ <https://students-residents.aamc.org/media/13381/download>

²⁰ Aggregated AAMC Data for DGSOM Applicants (2021-2024 Admissions Cycles); DGSOMAD-DOJ-00000746

²¹ <https://www.aamc.org/media/75901/download?attachment>

White	3.83	513	86
Two or More Races	3.68	513	86
Declined to Respond	3.9	516	92

As with the incoming class of 2023, the Median MCAT scores for the incoming class of 2024 exhibit significant differences across racial lines. The lowest group median score (Hispanic) is 26 percentile points below the highest group median score (Decline to Respond). This is about 1 standard deviation of difference between these two groups.²² The GPAs show an even larger disparity than 2023, with the lowest group median GPA (Hispanic) being 0.34 grade points lower than the highest group median GPA (Decline to Respond).

Data provided to the Department for the incoming class of 2025 reveals disparities between the academic qualifications of admitted students in different racial groups continue to the present time. These **median** scores in several cases contrast with DGSOM's announcement in just 2019 that it was using 512 (85) as an MCAT **cutoff score** for admission.²³

Findings

The Department finds that after *Harvard*, **DGSOM discriminated against other applicants to benefit preferred race classes of Black and Hispanic**. This discrimination is apparent from the documents expressing an intent to discriminate, plus the significant disparity in objective academic metrics between Black and Hispanic applicants compared with applicants from other racial categories. DGSOM's internal documents, including policies, training materials, and communications confirm the Department's findings that DGSOM intended to discriminate against all racial groups except Black and Hispanic applicants, to accept more Black and Hispanic applicants. Specifically, a roughly 1 standard deviation separation in median MCAT scores between racial groups, and over 0.25 median GPA separation between racial groups. As a result of these practices, highly qualified White, Asian, and other students were denied admission on the basis of their race.

For these reasons, the Department concludes that DGSOM discriminated on the basis of race for the incoming classes of 2023 through 2025, in violation of Title VI as interpreted by *Harvard*. Based on its review of DGSOM's documents and data, the Department believes that this discrimination is ongoing.

²² <https://www.aamc.org/media/75901/download?attachment>

²³ <https://web.archive.org/web/20260503190922/https://dailybruin.com/2019/01/17/david-geffen-school-of-medicine-raises-admission-standards-incites-controversy>.

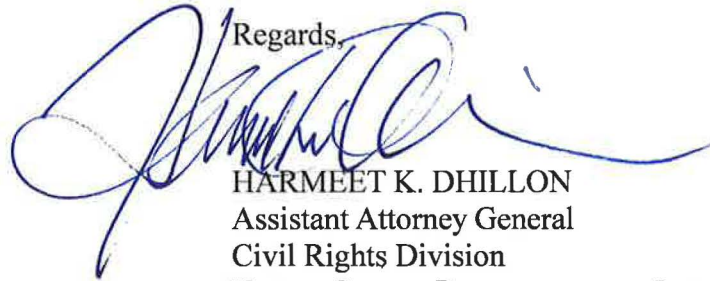
Resolution

Having determined that DGSOM deliberately discriminated on the basis of race in its decisions to admit and deny applicants, the Department seeks to enter into a voluntary resolution agreement with the University to ensure that admissions practices are brought into legal compliance. The Department is providing this notice to allow that process to continue, subject to potential limitation as set forth in the Order issued in *American Association of University Professors, et al. v. Donald J. Trump, et al.*, (25-cv-07864, N.D. Cal. 2025).

If you have any questions about this letter, please contact Brian L. Repper at brian.repper@usdoj.gov or (771) 202-1494.

Thank you in advance for your attention and cooperation.

Regards,

A handwritten signature in blue ink, appearing to read 'Harmeet K. Dhillon', is written over the typed name and title.

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division
UNITED STATES DEPARTMENT OF JUSTICE