



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General
950 Pennsylvania Ave, NW
Washington, DC 20530

September 22, 2026

Via Electronic Mail

Sam Hawgood
Chancellor
University of California, San Francisco
Office of the Chancellor, Box 0402
550 16th Street, 7th Floor
San Francisco, CA 94143
chancellor@ucsf.edu

Re: Finding of Title VI Violations by UC San Francisco School of Medicine

Dear Chancellor Hawgood:

The U.S. Department of Justice (“Department”) finds that the University of California, San Francisco (“UCSF”) illegally discriminated on the basis of race in its medical school admissions processes for the incoming classes of 2023, 2024, and 2025 and in its operation of diversity pipeline programs. These findings resulted from the Department’s investigation into whether UCSF School of Medicine’s (“UCSF Med”) admissions practices comply with Title VI of the Civil Rights Act of 1964 (“Title VI”),¹ as interpreted by the Supreme Court’s decision in *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College* (“SFFA”).²

Background

The Department enforces federal civil rights laws, including Title VI, which prohibits recipients of federal financial assistance from discriminating based on race.³ UCSF receives almost a billion dollars each year in federal funding,⁴ including a \$5 million grant from the Department.⁵

Title VI authorizes the Department to conduct periodic compliance reviews and investigations of the practices and policies of the recipients of federal funding.⁶ Enforcement under

¹ 42 U.S.C. § 2000d et seq (2026).

² 600 U.S. 181 (2023).

³ 42 U.S.C. § 2000d.

⁴ See U.S. Dep’t of the Treasury, Bureau of the Fiscal Serv., *Regents of The University of California, San Francisco, The* (Recipient Profile), USAspending.gov, <https://perma.cc/QUW2-EJYH> (last visited Sept. 16, 2026).

⁵ Bureau of the Fiscal Serv., *Department of Justice Grant to Regents of The University of California, San Francisco, The*, USAspending.gov, <https://perma.cc/P2T4-WV9U?type=image> (last visited Sept. 16, 2026).

⁶ 28 C.F.R. § 42.107 (2026).

Title VI requires funding agencies to advise recipients of their failure to comply and to determine whether compliance can be obtained by voluntary means.⁷ If the Department determines that noncompliance cannot be corrected by voluntary means, the Department may seek to compel compliance through enforcement.⁸

On March 30, 2026, the Department sent UCSF Med a notice of investigation letter and request for information. The Department requested, among other things, admissions data and other documents relating to UCSF Med's admissions policies and practices. UCSF Med requested multiple extensions of time to produce documents, which the Department granted. In response, UCSF Med produced the requested data, but only 83 other documents, most of which were non-responsive to the Department's requests. Among the Department's requests to which UCSF Med failed to respond was an explanation for any deviation in MCAT scores and GPAs between racial groups. The Department has reviewed the evidence UCSF Med produced, along with other publicly available information, all of which forms the basis of the Department's findings. The Department bases its findings on the documents UCSF Med produced and infers that additional exculpatory documents do not exist, or they would have been produced.

Legal Standard

Title VI prohibits federally funded universities from discriminating on the basis of race in granting access to educational and financial benefits.⁹ The Supreme Court's 2023 decision in *SFFA* reaffirms that federally funded universities violate Title VI by using race as a factor in admissions decisions.¹⁰ The Court's analysis of race-based admissions programs rests on the principle that use of racial classifications for any purpose triggers strict scrutiny.¹¹ *SFFA*'s reasoning extends beyond admissions to other university activities, including pipeline programs.

Illegal racial discrimination includes directly using racial criteria, employing race in a negative manner, engaging in racial stereotyping, pursuing racial balancing, and relying on vague diversity goals with no meaningful endpoint.¹² UCSF Med does all these things.

Evidence of Intent to Discriminate

UCSF Med openly admits that its goal is to increase enrollment from specific racial groups it designates as underrepresented minorities in medicine ("URM"),¹³ which excludes all white

⁷ 42 U.S.C. § 2000d-1.

⁸ 28 C.F.R. § 42.108 (2026).

⁹ *Id.* § 42.104(b).

¹⁰ *SFFA*, 600 U.S. at 198 n.2 (explaining that "discrimination that violates the Equal Protection Clause of the Fourteenth Amendment committed by an institution that accepts federal funds also constitutes a violation of Title VI" (quoting *Gratz v. Bollinger*, 539 U.S. 244, 276 n.23 (2003))).

¹¹ *SFFA*, 600 U.S. at 206-07.

¹² *Id.* at 223, 230.

¹³ UCSF uses various acronyms for so-called underrepresented minorities or groups, including URM or URG and URiM or UIM for underrepresented in medicine. For the sake of consistency, this letter will use URM.

students and most Asian students.¹⁴ UCSF Med’s Student Selection Admissions Policy articulates the school’s “commitment to reflect the population of California in our students”,¹⁵ even though the Supreme Court has held that such “‘outright racial balancing’ is ‘patently unconstitutional.’”¹⁶

On June 29, 2023, the day of the *SFFA* decision, UCSF Chancellor Sam Hawgood issued a statement¹⁷ in response to the Supreme Court’s ruling, co-signed by UCSF Chief Diversity and Outreach Officer J. Renée Navarro.¹⁸ The statement echoed University of California (“UC”) President Michael V. Drake’s vow to “prioritize student diversity with every tool available” and declared that the *SFFA* decision “does not directly impact the UC system. The State of California eliminated the use of race in public college and university admissions with the passage of Proposition 209 in 1996. Since that time, UC has pursued other avenues to achieve racial equity in its admissions policies.”¹⁹ For UCSF Med, “every tool available” before *SFFA* is still available after *SFFA*. The school’s ongoing commitment to race discrimination in defiance of federal law is merely a continuation of its decades-long defiance of state law.

In response to Proposition 209, UCSF Med, along with the rest of the UC system, embarked on a plan to circumvent the law by using supposedly race-neutral strategies to achieve its goal of racial balancing. These strategies included targeting outreach efforts to certain groups, schools, organizations, and geographic areas based on their racial composition. They also included diversity “pipeline” programs. These programs typically involved research opportunities, mentorship, assistance with college or medical school admissions, and often scholarships or stipends. They

¹⁴ UCSF Med defines “Asian American URiM” as Cambodian, Filipino, Hmong, Indonesian, Laotian, and Vietnamese. See, e.g., Univ. of Cal. Off. of the President, *Efforts by UC Medical Schools to Help Meet the Needs of Medically Underserved Communities through UC PRIME 5* (Feb. 19, 2025), <https://perma.cc/TU6L-68PE>.

¹⁵ UCSF Sch. of Med., *Student Selection Admissions Policy*, UCSF Medical Education <https://perma.cc/QM5C-7S99> (last updated May 13, 2025).

¹⁶ *SFFA*, 600 U.S. at 223 (quoting *Fisher v. Univ. of Tex.*, 570 U.S. 297, 311 (2012)).

¹⁷ Sam Hawgood et al., *SCOTUS Affirmative Action Decision*, UCSF Office of the Chancellor (June 29, 2023), <https://perma.cc/5EDG-M38P>.

¹⁸ Among Dr. Navarro’s many credentials, she has also served as the Associate Dean of Academic Affairs at UCSF Med, was the first UCSF Director of Academic Diversity, and is a member of the University of California President’s Task Force on Faculty Diversity. See *Renee Navarro, MD, PharmD*, USCF Dep’t of Anesthesia & Perioperative Care, <https://perma.cc/X4EC-2PK9> (last visited Sept. 17, 2026). As Director of Academic Diversity, “she was charged with coordinating the University’s Strategic Goal of Enhancing Diversity of ... students, ... through outreach, campus policy changes and education.” *Id.* She currently serves as the Vice Chancellor of Opportunity and Outreach in UCSF’s Chancellor’s Cabinet. *Renee Navarro, MD, PharmD*, Office of the Chancellor, <https://perma.cc/QK79-V2G6> (last visited Sept. 17, 2026).

¹⁹ Press Release, Univ. of Cal. Off. of the President, UC Statement on SCOTUS Decision Regarding the Use of Race in College Admissions (June 29, 2023), <https://perma.cc/G79K-NAET>.

were overtly aimed at recruiting and developing URM applicants for UC schools, including UCSF Med.²⁰

UCSF Med's admissions policy confirms that an "overarching goal" of its process is to admit students based on the school's values of diversity, equity, and inclusion:

UCSF Med promotes inclusive excellence applying holistic review principles. **The overarching goal of our admissions process is to recruit and admit students who align with the "PRIDE" values of our institution. Key priority areas include** but are not limited to ... **diversity, equity and inclusion.** An important element of review is "distance travelled" and commitment to promoting thriving environments that prioritize "community" values.²¹

PRIDE is a UCSF-coined acronym (the "D" stands for "Diversity") referring to "a common set of values to set a clear direction for all members of the UCSF community as we work together to fulfill our mission."²² UCSF Med touts its holistic approach to admissions, which considers factors such as income level, first generation to attend college, neighborhood or community circumstances, disadvantages overcome, low-performing secondary school attended, and the impact of an applicant's background and experiences on academic achievement. While schools may use race-neutral criteria to assess qualities such as character, determination, or breadth of experience, they "may not simply establish through application essays or other means the regime we hold unlawful."²³ As Chief Justice John Roberts wrote in *SFFA*, "what cannot be done directly cannot be done indirectly."²⁴ Even if the factors UCSF Med considers in its holistic approach appear to be race-neutral, their use for the explicit purpose of increasing URM admissions renders their use unlawful under Title VI.

Beyond racial proxies, UCSF Med directly considers race in its admissions decisions. Indeed, UC has acknowledged that its race-neutral approaches have failed to produce a "sufficiently racially diverse" student body, especially "at UC's most selective campuses, where African American, Native American, and Latinx [sic] students are underrepresented. . . ."²⁵ While UCSF Med's holistic review policy uses stereotypes about race and social class in an attempt to

²⁰ See Univ. of Cal. Off. of the Gen. Couns., *Guidelines for Addressing Race and Gender Equity in Academic Programs in Compliance with Proposition 209*, (July 2015), <https://perma.cc/NJV2-UT9C>; Univ. of Cal., *Guidelines for Enhancing Diversity at UC in the Context of Proposition 209* (Sept. 2016), <https://perma.cc/PC72-J7YU>.

²¹ UCSFSOM-DOJ-000000105 (emphasis added).

²² UCSF Off. of Opportunity and Outreach, *PRIDE Values*, <https://perma.cc/3BZA-HMSL> (last visited Sept. 17, 2026).

²³ *SFFA*, 600 U.S. at 230.

²⁴ *Id.*; see also *Arce v. Douglas*, 793 F.3d 968, 977 (9th Cir. 2015) (citing *Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 265–66 (1977)) (holding that a facially race-neutral law and its subsequent enforcement are unconstitutional if motivated by a discriminatory purpose).

²⁵ See Brief for the University of California as Amicus Curiae Supporting Respondents at 4, *Students for Fair Admissions, Inc. v. Pres. & Fellows of Harvard Coll.*, 600 U.S. 181 (2023).

increase the racial diversity of the class, the school also engages in direct racial discrimination through the use of race in its pipeline programs, application and essay questions, and the interview process. UCSF Med maintains these practices 30 years after the passage of Proposition 209 and despite Title VI and *SFFA*.

Discriminatory Pipeline Programs

As part of its efforts to increase URM medical school enrollment, UCSF operates numerous pipeline programs for URM students in high school through medical school. The UC PRIME program is the main pipeline program for medical students. Its stated aim is to increase “racial and ethnic diversity of the health workforce and deploy effective strategies to address provider shortages in medically underserved communities.”²⁶ UCSF Med offers two PRIME programs: the Program in Medical Education for the Urban Underserved (“PRIME-US”) and the San Joaquin Valley Program in Medical Education (“SJV PRIME”). These programs achieve their racial diversity goals through focused recruitment of URM applicants, channeling them through a special application process, and offering scholarships and other funding not available to other students.²⁷ As a result of these efforts, PRIME-US had 89% URM enrollment in 2024-2025,²⁸ and SJV PRIME had 52% URM enrollment.²⁹ In contrast, 35% of all UCSF Med students are URM, “which is among the highest percentages among all of the top medical schools in the country.”³⁰ UCSF Med’s PRIME programs function as a major URM recruitment tool, accounting for approximately 40% of the school’s total URM enrollment.³¹

Statistical Evidence of Intentional Discrimination

Admission to UCSF Med is highly competitive, but the chances of getting admitted vary depending on the applicant’s race. In 2025, more than 10,000 students applied to the medical school but only 247 were accepted, for an overall acceptance rate of approximately 2.5%.³² The acceptance rate was even lower for Asian and white applicants but was much higher for black and Hispanic applicants: the admissions rate for black applicants was 7% and 4.8% for Hispanic applicants compared to 1.7% for white applicants and 2% for Asian applicants.

²⁶ Univ. of Cal. Off. of the President, *supra* note 14, at 1.

²⁷ See UCSF Med. Educ. Sch. of Med., *Admissions*, <https://perma.cc/RL7P-6GZ9> (last visited Sept. 17, 2026); Kathleen Smith, *Cultivating Compassionate Physicians: The Impact of UCSF SJV PRIME Scholarships* (Apr. 13, 2025), UCSF Fresno, <https://perma.cc/5RWE-2P9Q>.

²⁸ Univ. of Cal. Off. of the President, *supra* note 14, at 16.

²⁹ *Id.*

³⁰ UCSF Med. Educ. Sch. of Med., *Our Impact*, <https://perma.cc/W82L-DQ8J> (last visited Sept. 17, 2026).

³¹ UCSF Med enrolls 670 students, 35% of which are URM, or roughly 235 students. There are 98 students in the pipeline PRIME Program: 71 students in PRIME-US, and 27 students in SJV PRIME. Univ. of Cal. Off. of the President, *supra* note 14, at 16. This means that approximately 42% of all enrolled URM students are from the pipeline PRIME Program.

³² UCSF Med. Educ. Sch. of Med., *Admissions Data Fall 2025 Admissions*, <https://perma.cc/EE4Z-U2QC> (last visited Sept. 17, 2026).

The Department's analysis of UCSF Med's applicant-level admissions data shows that from 2023 through 2025, UCSF Med consistently accepted white and Asian applicants at far lower rates than black and Hispanic applicants. At the same time, the school admitted black and Hispanic applicants with lower average MCAT scores and undergraduate GPAs³³ than white and Asian applicants. In 2025, **UCSF Med was 4.6 times more likely to admit Hispanic applicants and 12.6 times more likely to admit black applicants compared to white applicants with the same MCAT score, undergraduate GPA, and socioeconomic characteristics.** Black and Hispanic applicants had similarly high chances of admission compared to Asian applicants.

UCSF Med's discriminatory policies account for race at every step of the admissions process. As a member of the American Association of Medical School ("AAMC"),³⁴ UCSF Med uses its Primary Application, which asks applicants to identify their race and ethnicity, as the first step in its admissions process. The AAMC says that biographic information, such as ethnicity and race, "helps admissions officers gain a deeper understanding of [a candidate's] journey and background." According to AAMC, this information "provides insight into the experiences that may have shaped [a candidate's] path to medical school and may resonate with the mission and values of individual institutions, supporting their goals in advancing health care and serving their communities."³⁵ In other words, "race in itself 'says something about who you are'"³⁶—a notion roundly rejected by the court in *SFFA*.

The school's initial thresholds for screening Primary Applications—60th percentile MCAT score and 3.60 GPA³⁷—impacts who advances from the Primary Application to the Secondary Application. Between 2023 and 2025, UCSF Med's overall applicant pool had an average MCAT score in the 83rd percentile and undergraduate GPA of 3.77. **White and Asian applicants had average MCAT scores in the 86th to 89th percentiles and undergraduate GPAs of 3.77 and**

³³ UCSF Med provided either an undergraduate or postbaccalaureate GPA, but not both. This analysis was based only on students with an undergraduate GPA. A separate regression including postbaccalaureate GPA produced similar results.

³⁴ UCSF Med is not only a member of the AAMC, *see California*, AAMC, <https://perma.cc/3C8A-DSET> (last visited Sept. 18, 2026), it is also deeply involved in the organization's leadership. Dr. Navarro formerly served as chair of the AAMC's Group on Diversity and Inclusion and was recently elected to the AAMC Board of Directors. *See J. Renée Navarro, MD, PharmD, Elected to AAMC Board of Directors*, UCSF Off. of Opportunity and Outreach, <https://perma.cc/64UB-FFLS> (last visited Sept. 18, 2026). UCSF Med professor Elena Fuentes-Afflick is AAMC's Chief Scientific Officer. *See Elena Fuentes-Afflick, MD, MPH*, UCSF Pediatrics at ZSFG Dep't of Pediatrics, <https://pediatrics.ucsf.edu/people/elena-fuentes-afflick> (last visited Sept. 18, 2026); *Elena Fuentes-Afflick, MD, MPH Chief Scientific Officer*, AAMC, <https://perma.cc/8DCV-AW3N> (last visited Sept. 18, 2026). And UCSF Med's Executive Vice Dean Catherine R. Lucey "is a member of the AAMC MR5 committee, charged with overseeing the revision of the Medical College Admission Test process." *Catherine R. Lucey*, UCSF Healthcare Admin. and Interprofessional Leadership Program, <https://perma.cc/9YAH-87RL> (last visited Sept. 18, 2026).

³⁵ *Biographic Information*, AAMC, <https://perma.cc/5RCQ-VQZQ> (last visited Sept. 21, 2026).

³⁶ *SFFA*, 600 U.S. at 220.

³⁷ UCSFSOM-DOJ-000000105.

3.82. However, black and Hispanic applicants had average MCAT scores between the 60th and 70th percentile, and undergraduate GPAs between 3.60 and 3.67, consistent with the school's low initial screening thresholds.

Both the Primary and Secondary Applications ask applicants to write hardship narratives and diversity statements. Between 2023 and 2025, the essay prompts included questions, such as:

- “UCSF PRIDE values serve as a guiding light for institutional life and activities. Briefly describe how you will contribute to and support our PRIDE values consistent with your goals or life experience;” and
- “Do you identify as being part of a marginalized group socioeconomically or in terms of access to quality education or healthcare? Please describe how this inequity has impacted you and your community.”

These prompts opened the door for applicants to disclose and highlight their race.

UCSF Med's Admissions Committee selects fewer than 10% of Secondary Applications to advance to the interview stage. Consistent with the racial disparities among admitted students, the Admissions Committee invites black and Hispanic applicants to interview at far higher rates than white and Asian applicants. And those black and Hispanic interviewees have lower mean MCAT scores and undergraduate GPAs than their white and Asian counterparts.

Percentage of Applicants Invited to Interview by Race, with Mean MCAT and Undergraduate GPA Scores				
	Invited to Interview	Mean MCAT Score	Mean MCAT Percentile	Mean UGPA
2023				
Asian	4.66%	519	96	3.92
Black	10.47%	513	86	3.82
Hispanic	7.88%	515	90	3.84
White	3.03%	518	95	3.92
2024				
Asian	5.44%	517	94	3.92
Black	10.56%	515	91	3.85
Hispanic	8.87%	514	89	3.87
White	4.40%	518	95	3.91
2025				
Asian	4.81%	517	94	3.92
Black	11.52%	513	87	3.83
Hispanic	8.32%	512	84	3.85
White	3.95%	518	95	3.92

After the interview stage, the Admissions Committee makes final decisions about which interviewees to admit and which to reject. From 2023 to 2025, those decisions heavily favored black and Hispanic applicants over white and Asian applicants. During that time period, the school accepted 1.50% to 1.70% of white applicants and 1.98% to 2.55% of Asian applicants, compared to 4.83% to 6.69% of Hispanic applicants and 6.96% to 11.43% of black applicants.

Acceptance Rates by Race, with Mean MCAT and Undergraduate GPA Scores of Admitted Students				
Race	Acceptance Rate	Mean MCAT Score	Mean MCAT Percentile	Mean UGPA
2023				
Asian	2.55%	518	95	3.92
Black	11.43%	513	86	3.84
Hispanic	6.69%	514	88	3.85
White	1.50%	519	96	3.93
2024				
Asian	2.44%	518	95	3.93
Black	7.65%	515	91	3.87
Hispanic	5.86%	515	91	3.88
White	1.65%	518	95	3.93
2025				
Asian	1.98%	518	95	3.93
Black	6.96%	514	89	3.86
Hispanic	4.83%	513	87	3.88
White	1.70%	519	96	3.95

Not only were the mean test scores and undergraduate grades of admitted black and Hispanic applicants lower than those of admitted white and Asian applicants, but they are also lower than those of *rejected* white and Asian applicants. In other words, **the average admitted black and Hispanic student academically underperformed the average rejected white and Asian student.**

Findings

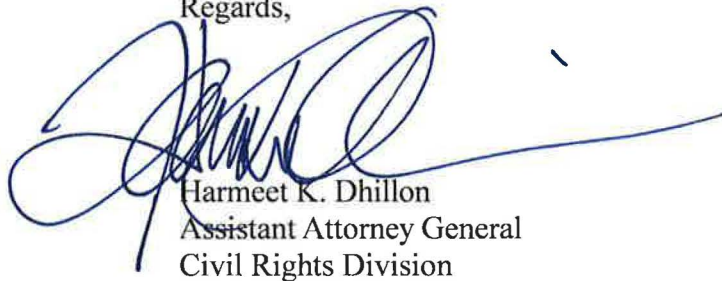
For these reasons, the Department finds that UCSF Med engaged in intentional racial discrimination in violation of Title VI. Between 2023 and 2025, UCSF Med illegally discriminated against white and Asian students in its admissions process. Furthermore, during that time period, UCSF gave non-white and non-Asian students preferential access to its diversity pipeline programs. As a result of these practices, UCSF Med denied similarly or higher qualified white and Asian students access to educational opportunities based on their race.

Resolution

Having determined that UCSF Med deliberately discriminated on the basis of race in its decisions to admit or deny applicants and in its pipeline programs, the Department seeks to resolve this matter through a voluntary compliance agreement. We invite UCSF Med to enter into discussions with the Department to develop and implement a resolution agreement to ensure that its admissions practices and pipeline programs meet all requirements of Title VI. If UCSF Med is willing to enter into a voluntary resolution agreement with the Department to resolve this matter, please contact us by October 2, 2026.

If you have any questions about this letter, please contact Deputy Assistant Attorney General Jeffrey Morrison at jeffrey.morrison@usdoj.gov or (202) 353-1845. Thank you in advance for your attention and cooperation.

Regards,

A handwritten signature in blue ink, appearing to read 'Harmeet K. Dhillon', with a long horizontal line extending to the right.

Harmeet K. Dhillon
Assistant Attorney General
Civil Rights Division

cc:

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