

THE EQUAL PROTECTION PROJECT
A Project of the Legal Insurrection Foundation
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November 9, 2026

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, 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 and Request For Investigation Against Tulane University Regarding its IMPRESS Program

Dear Director Stannard and HHS OCR Staff:

This is a federal civil rights complaint and request for investigation pursuant to the U.S. Department of 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 opposes unlawful discrimination in any form.

We bring this civil rights complaint and request for investigation against Tulane University School of Medicine ("Tulane Medical School" or "Tulane") regarding its IMPRESS

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

program which appears to discriminate on the basis of race, color, and/or national origin in violation of Title VI and/or Section 1557 of the Affordable Care Act.

TULANE UNIVERSITY SCHOOL OF MEDICINE'S DEPARTMENT OF SURGERY IMPRESS PROGRAM

Tulane University School of Medicine operates the Introduction to the Medical Profession: a Rotation to Empower Students ("IMPRESS") program through its Department of Surgery.[2] IMPRESS is a multi-week summer program for first- and second-year college students interested in pursuing careers in medicine. The 2026 program ran June 8, 2026 through July 17, 2026.[3] The 2027 program is scheduled to run from June 7, 2027, through July 16, 2027.[4]

Participants receive professional development opportunities, exposure to medical specialties and technologies, one-on-one career mentorship, housing, and meal stipends.

> **Link:** https://medicine.tulane.edu/office-academic-excellence-community-engagement/pathway-programs
> **Archived Link:** https://archive.is/wip/GJdJ8
> **Discriminatory Requirement:** "IMPRESS is a five-week course where students with underrepresented backgrounds in medicine have a chance to receive mentorship and tips centered around a career in medicine."

> **IMPRESS**
>
> Coordinated through the Department of Surgery, IMPRESS is a five-week course where students with underrepresented backgrounds in medicine have a chance to receive mentorship and tips centered around a career in medicine. Participants will have exposure to several medical specialties and advanced medical technologies.

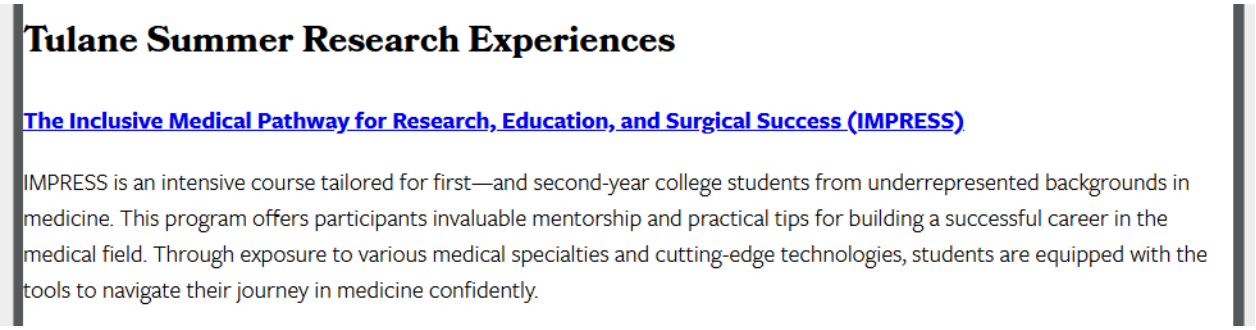
Tulane repeatedly describes IMPRESS as a program intended for students from "underrepresented backgrounds in medicine."[5] Tulane considers "underrepresented

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[2] https://medicine.tulane.edu/surgery/academic-programs/impress [https://archive.is/wip/LWjWR] (accessed October 22, 2026).
[3] https://web.archive.org/web/20251113203505/https://medicine.tulane.edu/surgery/academic-programs/impress (accessed October 27, 2026).
[4] https://medicine.tulane.edu/surgery/academic-programs/impress [https://archive.is/2sLUf] (accessed October 27, 2026).
[5] https://medicine.tulane.edu/office-academic-excellence-community-engagement/pathway-programs [https://archive.is/wip/827sQ] (accessed October 22, 2026).

backgrounds" in medicine to include "African American, Hispanic, Vietnamese, Native American/Alaskan Natives, Pacific Islanders."[6]

For example, Tulane's Office of Academic Excellence and Community Engagement describes IMPRESS as a course in which students from "underrepresented backgrounds in medicine" receive mentorship and career guidance. Tulane's Fellowship Advising webpage similarly characterizes IMPRESS as an intensive course for first- and second-year college students from "underrepresented backgrounds in medicine."[7]



Tulane Summer Research Experiences

The Inclusive Medical Pathway for Research, Education, and Surgical Success (IMPRESS)

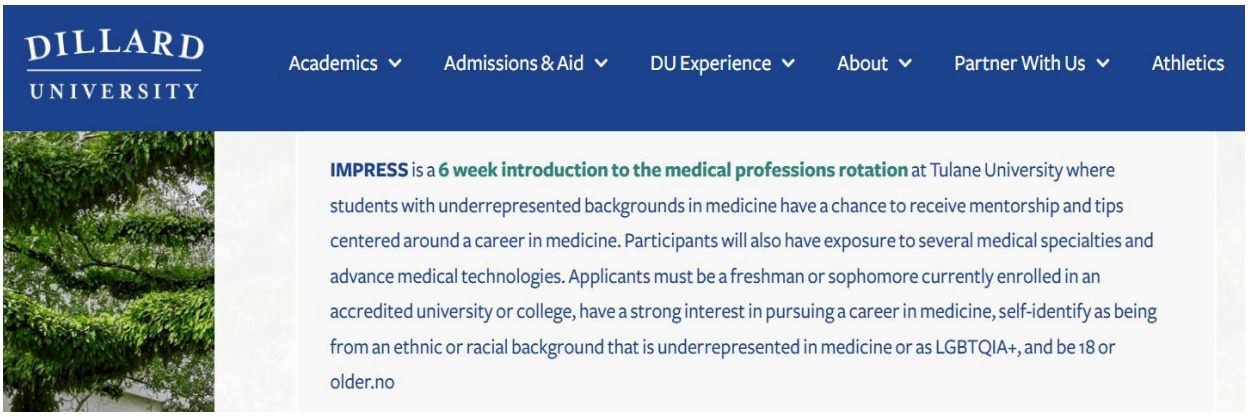
IMPRESS is an intensive course tailored for first—and second-year college students from underrepresented backgrounds in medicine. This program offers participants invaluable mentorship and practical tips for building a successful career in the medical field. Through exposure to various medical specialties and cutting-edge technologies, students are equipped with the tools to navigate their journey in medicine confidently.

Additionally, Tulane's Department of Surgery describes IMPRESS as a program designed for students from "underrepresented backgrounds in medicine," providing participants with professional mentorship, career guidance, and exposure to medical specialties and technologies.

Further evidence concerning the program's intended participants appears on Dillard University's website.[8] Dillard University, a historically Black university located in New Orleans, describes IMPRESS as a six-week introduction to medical professions at Tulane for students from underrepresented backgrounds in medicine. Dillard further states that applicants must be college freshmen or sophomores, be at least 18 years old, have a strong interest in pursuing medicine, and: "self-identify as being from an ethnic or racial background that is underrepresented in medicine or as LGBTQIA+"

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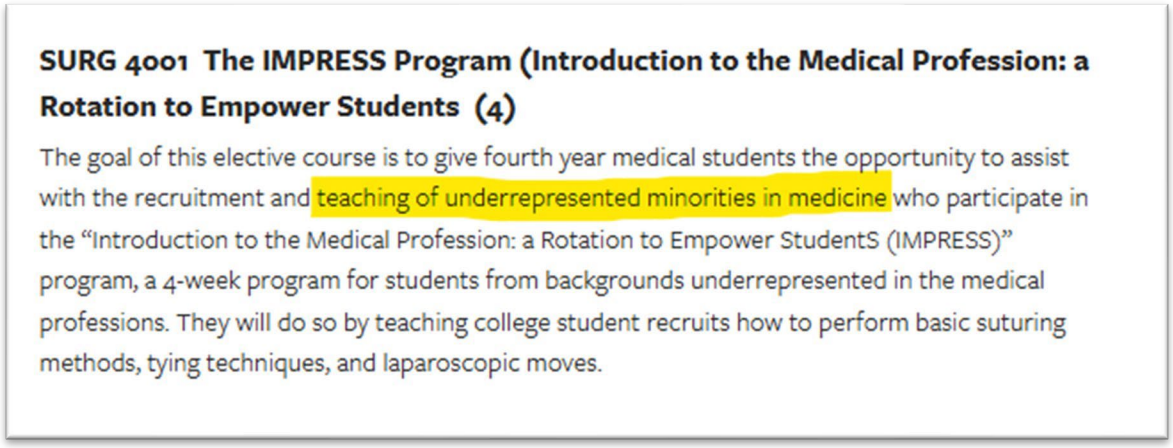
[6] https://medicine.tulane.edu/sites/default/files/pictures/OMA_Diversity_Inclusion_At_A%20Glance_092718.pdf [archive.org] (accessed October 22, 2026).
[7] https://uraf.tulane.edu/stem-opportunities [https://archive.is/wip/3r8tA] (accessed October 22, 2026).
[8] https://www.dillard.edu/academics/pre-health-program/ [https://archive.is/wip/wOT3J] (accessed October 22, 2026).



Finally, Tulane's medical school course catalog describes a fourth-year medical student elective associated with IMPRESS.[9] According to the catalog, the elective is intended to provide fourth-year medical students with opportunities to assist in recruiting and teaching "underrepresented minorities in medicine" who participate in IMPRESS. The use of the term "minorities" in the course description confirms that Tulane considers those "underrepresented in medicine" to be non-whites.[10]

[9] https://catalog.tulane.edu/courses/surg/ [https://archive.is/wip/eeE3d] (accessed October 22, 2026).

[10] Courts often 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).



SURG 4001 The IMPRESS Program (Introduction to the Medical Profession: a Rotation to Empower Students (4)

The goal of this elective course is to give fourth year medical students the opportunity to assist with the recruitment and teaching of underrepresented minorities in medicine who participate in the "Introduction to the Medical Profession: a Rotation to Empower StudentS (IMPRESS)" program, a 4-week program for students from backgrounds underrepresented in the medical professions. They will do so by teaching college student recruits how to perform basic suturing methods, tying techniques, and laparoscopic moves.

[Yellow highlighting added above]

IMPRESS Benefits

IMPRESS provides participants with significant educational, professional development, and financial benefits. According to Tulane's website, participants receive housing, one-on-one career mentorship from experienced physicians and surgeons, and a meal stipend provided at the conclusion of the program.[11]

Students also receive exposure to various medical specialties and advanced medical technologies through clinical rotations, instructional sessions, and hands-on simulations. These opportunities allow participants to gain practical experience in the medical field while receiving guidance on navigating medical school and selecting a medical specialty.[12]

[11] https://medicine.tulane.edu/surgery/academic-programs/impress [https://archive.is/wip/LWjWR] (accessed October 22, 2026).
[12] https://medicine.tulane.edu/surgery/academic-programs/impress [https://archive.is/wip/LWjWR] (accessed October 22, 2026).

Participants receive personalized mentorship from experienced physicians and surgeons who guide them through medical school challenges and specialty selection. The curriculum includes practical workshops on clinical reasoning, surgical techniques, and patient communication.

Application Information

- Online submission of the application will open on **October 15, 2026.**
- **Applicants need:**
  - **250-word** statement on why the applicant is interested in the program
  - **Official or unofficial transcript** should be received by **January 31, 2027**
  - **Two** letters of recommendation will be due by the application deadline*
- Application deadline is 11:59 pm CT on **January 31, 2027.**



(Pictured: IMPRESS 2025 Cohort)

Additionally, IMPRESS provides participants with educational and career development opportunities designed to prepare them for medical school and careers in medicine. The program includes instruction on medical research, medical ethics, MCAT preparation, interviewing skills, medical school applications, résumé development, and financial planning. Participants engage in hands-on training involving suturing, knot tying, laparoscopic surgery, robotic surgery, and endoscopy. Through these opportunities, participants gain access to specialized training, professional mentorship, and clinical experiences that may strengthen their preparation for admission to medical school and future careers in medicine.[13]

[13] https://uraf.tulane.edu/stem-opportunities [https://archive.is/wip/3r8tA] (accessed October 22, 2026).



Schedule

The **IMPRESS** program will take place from **June 7, 2027, to July 16, 2027**.

Week 1: Orientation and didactics

Week 2-5: Clinical Rotations, Didactics, Simulation

Week 6: Clinical Rotations, Didactics, Simulation, End-of-Program Awards Luncheon

Example Didactics Topics: Intro to Research, Medical Ethics and Etiquette, MCAT Prep, Interviewing Skills, Medical School Application Tips, CV Building, Financial Planning, Wellness

Example Simulation Topics: Suturing, Knot Tying, Intro to Laparoscopic Surgery, Intro to Robotic Surgery, Intro to Endoscopy

Other Program Benefits

- Housing Will Be Provided
- One-on-One Career Mentorship
- Meal Stipend Will Be Provided at the End of the Program

The IMPRESS Program Appears to Violate Federal Law

The IMPRESS Program is promoted for students who are "underrepresented in medicine," which Tulane itself defines by racial and/or ethnic classifications and appears to violate federal civil rights laws.

Tulane's IMPRESS Appears to Violate 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 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 Tulane Medical School is an HHS funded program it is subject to Title VI.[14]

Regardless of Tulane's reasons for offering, promoting, and administering these race- and ethnicity-based programs, such conduct may violate 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

[14] *See* https://www.usaspending.gov/award/ASST_NON_R01AA029989_075 [https://archive.is/wip/v8v3B] (accessed September 14, 2026).

(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).

Based on the evidence on Tulane's own websites, there certainly is a need for HHS to investigate any possible violation of Title VI.

Tulane's IMPRESS Program Appears to Violate ACA Section 1557

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 receiving federal financial assistance. Specifically, Section 1557 prohibits individuals from being excluded from participation in, denied the benefits of, or subjected to discrimination under covered health programs or activities on grounds prohibited by Title VI, the Age Discrimination Act, or Section 504 of the Rehabilitation Act. 42 U.S.C. § 18116(a).

HHS regulations apply to "[e]very health program or activity, any part of which receives Federal financial assistance, directly or indirectly, from the Department." 45 C.F.R. § 92.2(a)(1). A "health program or activity" includes undertakings that "[p]rovide health education for health care professionals or others," as well as "[a]ll of the operations of any entity principally engaged" in providing or administering health programs or activities. 45 C.F.R. § 92.4(1)(v), (2).

Tulane University School of Medicine receives federal financial assistance from HHS and operates IMPRESS through its Department of Surgery. IMPRESS provides aspiring medical professionals with clinical and surgical training, exposure to medical specialties, and mentorship from physicians and surgeons. It also offers participants housing, meal stipends, and professional development opportunities. Accordingly, IMPRESS constitutes a covered health program or activity because it provides health education and operates within an HHS-funded medical school. The absence of federal funding specifically designated for IMPRESS does not, by itself, exclude the program from Section 1557's coverage.

Tulane repeatedly describes IMPRESS as a program for students from "underrepresented backgrounds in medicine." Tulane has identified certain racial and ethnic groups as underrepresented in medicine, including women, African Americans, Hispanics, Vietnamese, Native Americans/Alaskan Natives, and Pacific Islanders. Further, Dillard University's description of IMPRESS states that applicants must "self-identify as being from an ethnic or racial background that is underrepresented in medicine or as LGBTQIA+." These descriptions raise concerns that race or ethnicity appear to influence access to the program's educational, professional, and financial benefits.

Because Section 1557 incorporates Title VI's prohibition on discrimination based on race, color, and national origin, any race- or ethnicity-based restrictions or preferences in

selecting IMPRESS participants may violate Section 1557. Accordingly, there is a need for HHS to investigate whether Tulane's IMPRESS program uses discriminatory eligibility or selection criteria in violation of Section 1557 of the ACA.

HHS OCR HAS JURISDICTION

Tulane University School of Medicine receives federal financial assistance from HHS and operates IMPRESS through its Department of Surgery. As a recipient of federal financial assistance, Tulane is subject to applicable federal antidiscrimination requirements, including Title VI. Moreover, IMPRESS constitutes a health program or activity under Section 1557 because it provides health education to aspiring medical professionals. Accordingly, HHS OCR has jurisdiction to investigate whether IMPRESS's eligibility and selection practices violate Title VI and Section 1557 of the ACA.[15]

REQUEST FOR INVESTIGATION AND ENFORCEMENT

In *Richmond v. J. A. Croson Co.*, Justice Scalia aptly quoted the observation that "discrimination on the basis of race is illegal, immoral, unconstitutional, inherently wrong and destructive of a democratic society." 488 U.S. 469, 521 (1989) (Scalia, J., concurring in the judgment) (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).

HHS has the authority to investigate Tulane University School of Medicine's administration of IMPRESS, including its eligibility requirements, recruitment practices, and participant selection criteria. HHS should determine whether Tulane uses race, color, or national origin in determining access to IMPRESS's educational, professional-development, and financial benefits. HHS should also examine whether these practices violate applicable federal antidiscrimination laws, conflict with Executive Orders 14173 and 14332 or applicable federal funding requirements, or are inconsistent with any certifications or representations Tulane has made concerning its compliance with federal law. Where authorized and warranted, HHS should pursue appropriate remedial measures, including proceedings to suspend or terminate federal financial assistance or referral to the Department of Justice for judicial enforcement. After all, "[t]he way to stop discrimination on the basis of race is to stop discriminating on the basis of race." *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007).

Accordingly, we respectfully request that HHS promptly open a formal investigation; determine whether Tulane University School of Medicine's IMPRESS program violates Title VI,

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[15] https://www.usaspending.gov/recipient/ce600306-35f6-a322-8af6-77e17ec30fe9-C/latest [https://archive.is/wip/claEJ] (accessed October 22, 2026).

Section 1557 of the ACA, or other applicable federal antidiscrimination requirements; and obtain all appropriate remedial relief necessary to ensure that federal funds do not support or facilitate discrimination based on race, color, or national origin.

Respectfully submitted,

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