

No. 19-2005

**United States Court of Appeals
for the First Circuit**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff-Appellant,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE,

Defendant-Appellee.

Appeal from the United States District Court

for the District of Massachusetts

(No. 1:14-cv-14176)

***AMICUS CURIAE* BRIEF FOR 678 SOCIAL SCIENTISTS AND
SCHOLARS ON COLLEGE ACCESS, ASIAN AMERICAN STUDIES,
AND RACE IN SUPPORT OF DEFENDANT-APPELLEE**

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TABLE OF CONTENTS

TABLE OF AUTHORITIES	iv
RULE 29(a)(4)(E) STATEMENT	x
IDENTITY AND INTERESTS OF <i>AMICI CURIAE</i>	1
ARGUMENT	2
I. THE DISTRICT COURT CORRECTLY CONCLUDED THAT HARVARD’S WHOLE-PERSON REVIEW IS NARROWLY TAILORED TO MEET A COMPELLING INTEREST.	3
A. Harvard’s Whole-Person Review Furthers Its Compelling Educational Mission.	4
B. Harvard’s Whole-Person Review Benefits Asian American Applicants Given Their Extremely Diverse Experiences.	7
C. Plaintiff’s Excessive Focus on Numerical Measures Ignores the Vast Differences in Experiences of Asian American Applicants.	11
II. THE DISTRICT COURT CORRECTLY FOUND NO EVIDENCE OF DISCRIMINATION AGAINST ASIAN AMERICANS.	13
A. The Personal Rating Benefits All Students by Capturing the Diversity of Their Experiences.	13
B. Social Science Research Offers a Number of Nondiscriminatory Explanations for Differences Among Average Personal Ratings.	15
1. <i>Asian Americans Are More Likely to Attend Public High Schools, Where Larger Workloads Can Prevent Staff from Writing Strong Recommendation Letters.</i>	15
2. <i>Asian Americans Are More Likely to Apply to Highly Selective Colleges Like Harvard.</i>	18
C. Plaintiff’s Arguments Are Based on Racial Stereotypes About Asian Americans.	20
1. <i>Selective Immigration Policies, Not Innate Ability, Explain Key Academic Differences Between Asian Americans and Other Racial and Ethnic Groups.</i>	20
2. <i>Asian Americans Benefit from Presumed Advantages that Can Positively Influence Their Academic Rating.</i>	24

III. RACE-CONSCIOUS POLICIES PREVENT HARM TO ASIAN AMERICAN APPLICANTS.....	28
A. Failing to Consider Race as One of Many Factors in Admissions Would Harm Asian American Applicants.	28
B. A Large Majority of Asian Americans Support Race-Conscious Admissions Policies.	29
CONCLUSION.....	31

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RULE 29(a)(4)(E) STATEMENT

This brief was authored by the undersigned counsel and no party's counsel authored this brief, in whole or in part. No party or party's counsel contributed money that was intended to fund preparing or submitting this brief. No person other than *amici* and their counsel contributed money that was intended to fund preparing or submitting this brief.

IDENTITY AND INTERESTS OF *AMICI CURIAE*

Amici curiae are 678 social scientists and scholars with doctoral degrees who have extensively studied education issues related to Asian Americans, college access, and race in postsecondary institutions and society.¹ *Amici* comprise researchers and scholars employed at 253 different institutions and organizations, including more than 241 colleges and universities across the United States. Their work extends across numerous fields and disciplines, including education, Asian American studies, sociology, anthropology, psychology, public policy, political science, and history. Many *amici* have been recognized with the highest national honors and awards in their field. Fifteen *amici* are members of the American Academy of Arts & Sciences, 20 are members of the National Academy of Education, and 61 are past or current presidents of national organizations, including the American Educational Research Association, the Association for the Study of Higher Education, and the Association for Asian American Studies.

Amici have an interest in providing the Court with social science research findings that address the educational judgments Harvard College considers in designing and implementing its whole-person review process. The brief draws upon

¹ A full list of *amici* is included in the Appendix. Institutional affiliation is provided for identification purposes only and does not reflect the views or the endorsement of the institution.

amici's original research and their review of the literature, including the most extensive and up-to-date body of knowledge about how race-conscious admissions processes benefit Asian Americans. As scholars committed to policies and practices informed by research-based evidence, *amici* are deeply concerned by Plaintiff's excessive focus on limited measures of academic success that research has shown to be unreliable as isolated measures of merit, and by its reliance on stereotypes and the myth of an Asian penalty. Further, *amici* are concerned that the removal of race-conscious admissions would harm Asian American applicants.

Counsel for Plaintiff-Appellant and for Defendant-Appellee have consented to the filing of this brief.

ARGUMENT

Harvard College could fill every incoming class with students who have perfect test scores or high school grade-point averages (GPAs). But that is not the educational environment Harvard seeks to create. Instead, as the district court found, Harvard strives to prepare its students "to assume leadership roles in the increasingly pluralistic society into which they will graduate" by exposing them to a community that is diverse along many axes, including race. Addendum to Pl.'s Br. (Add.) 106 (internal quotation marks omitted). The district court correctly rejected Plaintiff's argument that Harvard's holistic race-conscious approach to admissions subjects Asian American applicants to race-based discrimination and disadvantage. To the

contrary, high-achieving Asian American applicants benefit from Harvard’s individualized whole-person review process because it treats each applicant as an individual and inhibits the influence of racial biases and assumptions. Unlike Harvard, Plaintiff treats Asian Americans as a homogenous population, never pausing to acknowledge the immense diversity within that group or the benefits that applicants of *all* races enjoy from Harvard’s whole-person review.

I. THE DISTRICT COURT CORRECTLY CONCLUDED THAT HARVARD’S WHOLE-PERSON REVIEW IS NARROWLY TAILORED TO MEET A COMPELLING INTEREST.

The district court correctly concluded that “Harvard’s admissions program ‘bears the hallmarks of a narrowly tailored plan’ in that ‘race [is] used in a flexible, nonmechanical way’ and considered ‘as a “plus” factor in the context of individualized consideration of each and every applicant.’” Add. 108 (quoting *Grutter v. Bollinger*, 539 U.S. 306, 334 (2003)). Every year, the number of academically qualified applicants who seek admission to Harvard’s freshman class exceeds by tens of thousands the number of available slots. As the district court concluded, in choosing among that vast pool of well-qualified applicants, “Harvard ‘engages in a highly individualized, holistic review of each applicant’s file,’” and “its ‘race-conscious admissions program adequately ensures that all factors that may contribute to student body diversity are meaningfully considered alongside race in admissions decisions.’” *Ibid.* (quoting *Grutter*, 539 U.S. at 337-338). In so doing, Harvard treats

“each applicant as an individual, and not simply as a member of a particular racial group.” *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 722 (2007).

The entire Harvard community benefits from that whole-person approach to admissions—including Asian American students and applicants. Plaintiff’s arguments to the contrary are based on false premises and stereotypes, and in many respects they contradict social-science research. Harvard’s whole-person review benefits Asian Americans because of their diverse experiences.

A. Harvard’s Whole-Person Review Furthers Its Compelling Educational Mission.

The district court correctly held that Harvard’s holistic review process furthers its compelling interest in assembling a diverse body of students who will learn from and challenge each other while creating a pluralistic environment in which “to educate the citizens and citizen-leaders for our society.” Harvard College, *Mission, Vision, and History*² (quoted at Add. 7). Critical to that mission is providing students with “a diverse living environment, where students live with people who are studying different topics, who come from different walks of life and have evolving iden-

² Available at <https://college.harvard.edu/about/mission-and-vision> (last visited May 5, 2020).

tities,” so that students may “deepen[]” their “intellectual transformation” and “create[]” “conditions for social transformation.” *Ibid.*

In service of its mission, Harvard employs a robust process of whole-person review that permits students, including Asian Americans, to demonstrate the *full range* of contributions each applicant can make to Harvard’s educational environment. Even when assessing an applicant’s academic potential, Harvard does not limit itself to considering narrow metrics of academic achievement like high school grades and test scores. Harvard also considers teacher and counselor recommendations, submitted student work, the relative academic strength of an applicant’s high school, the types of classes an applicant took in high school, and academic and career interests, among other factors. Add. 11-12, 18-20.

As the district court found, “[i]n making admissions decisions, Harvard’s goal is to admit the best freshman class for Harvard College, not merely a class composed of the strongest applicants based solely on academic qualifications.” Add. 25. Because previous academic achievement alone is a necessary, but insufficient, prerequisite for admission, Harvard considers an applicant’s personal and family history, non-academic achievements, personal goals, and any other available information that would inform a full assessment of how each applicant can contribute to the Harvard community. Add. 11-12. Harvard’s “current admissions program considers

race as one factor among many, in an effort to assemble a student body that is diverse in ways broader than race.” *Grutter*, 539 U.S. at 340.

Research demonstrates the benefits of Harvard’s holistic approach, which assesses an applicant’s individual characteristics in light of “environmental factors such as socioeconomic background, racial identity, and school and family context that have shaped a student’s academic and extracurricular achievements.” Michael N. Bastedo et al., *What Are We Talking About When We Talk About Holistic Review? Selective College Admissions and Its Effects on Low-SES Students*, 89 J. Higher Educ. 782, 793 (2018). Such a contextual consideration of each applicant’s achievements permits admissions officers to “contemplate[] how applicants maximize available educational offerings and push themselves academically within their unique contexts.” *Ibid.* As one admissions officer who participated in that research explained, “it is impossible to understand the achievements of a student without also understanding the various external influences—school setting, socioeconomic status, ethnic background, geographic background, and family background—that have contributed to his or her journey.” *Ibid.*

Focusing on numeric measures of academic achievement alone—as Plaintiff does and as its statistical expert did—cannot take account of the diverse experiences and accomplishments that Harvard values in its students and does not accurately model the admissions process Harvard uses. Plaintiff’s approach “over emphasizes

grades and test scores and undervalues other less quantifiable qualities and characteristics that are valued by Harvard and important to the admissions process.” Add. 62.

B. Harvard’s Whole-Person Review Benefits Asian American Applicants Given Their Extremely Diverse Experiences.

Even when viewing Asian Americans as a block, as Plaintiff does, data show that Asian Americans greatly benefit from Harvard’s whole-person review. A recent study demonstrates that holistic-review practices like Harvard’s can increase the odds of admission for Asian Americans at elite universities, while also maintaining high academic metrics of achievement within an admitted class. Michael N. Bastedo et al., *Information Dashboards and Selective College Admissions: A Field Experiment* 3 (2017).³

Harvard’s statistics confirm those social science findings. Even among the subset of applicants Plaintiff focuses on—non-ALDC (athletes, lineage, dean/director lists, and children of faculty/staff) applicants—for the years under review in this case, Asian American applicants were admitted at a higher rate (5.15%) than white applicants (4.91%). Doc. 414-2, Plaintiff’s Statement of Material Facts (SMF)

³ Available at <http://www-personal.umich.edu/~bastedo/papers/ASHE2017.paper.pdf> (last visited May 5, 2020).

¶ 638; Doc. 419-33, Report of David Card, Ph.D. ¶¶ 70-71 & Ex. 7; Doc. 420, Defendant's SMF ¶ 229. And the proportion of Asian Americans in each admitted class at Harvard has increased by 29% in the last decade. Def.'s SMF ¶ 113; *see also* Add. 82. Plaintiff's allegation of intentional discrimination against Asian Americans—who are 6% of the U.S. population and over 20% of students admitted to Harvard—lacks a basis in common sense as well as evidentiary support. U.S. Census Bureau, Quick Facts, Population Estimates (2017)⁴; Harvard College, Admissions Statistics⁵; *see* Add. 11, 82, 126. Those statistics and research indicate that Asian American applicants benefit from Harvard's whole-person review.

The fact that Asian American applicants benefit from Harvard's whole-person review is no surprise—because individual Asian American applicants come from a diverse set of backgrounds and experiences. Plaintiff treats Asian American applicants as a homogenous group that excels and contributes in only a narrow range of human activity. But Harvard treats Asian American applicants as individuals, taking account of the broad array of ethnicities, cultural heritages, economic and educational circumstances and opportunities, and American experiences they bring to the table. *Compare, e.g.*, JA1003-JA1004 (Fitzsimmons discussion of diversity among

⁴ Available at <https://www.census.gov/quickfacts/fact/table/US/PST045217> (last visited May 5, 2020).

⁵ Available at <https://college.harvard.edu/admissions/admissions-statistics> (last visited May 5, 2020).

Asian-American applicants), *with* JA2338 (Arcidiacono characterization of relative penalties among major racial groups).

As one demographic report explains: “Asian Americans come from all walks of life. Some are doctors or lawyers; others work in restaurants or nail salons. Many were born in the United States; most are immigrants from many countries, including Bangladesh, Burma, Cambodia, China, India, Indonesia, Japan, Korea, Laos, Malaysia, Nepal, Pakistan, the Philippines, Sri Lanka, Taiwan, Thailand, and Vietnam.” Asian Am. Ctr. for Advancing Justice, *A Community of Contrasts: Asian Americans in the United States 2* (2011).

Asian Americans are “the most economically divided racial or ethnic group in the [United States],” displaying the largest degree of within-group income inequality. Rakesh Kochhar & Anthony Cilluffo, Pew Research Ctr., *Key Findings on the Rise in Income Inequality Within America’s Racial and Ethnic Groups 2* (2018). A natural consequence of such a wide range of family income levels is an equally large disparity in educational opportunities and achievement. Studies show, for example, that many Asian Americans who have roots in Southeast Asia (*i.e.*, Cambodians, Hmong, Laotians, and Vietnamese) and who trace their family’s arrival in the United States to wartime displacement have comparatively low rates of college entry and completion. Nat’l Comm’n on Asian Am. & Pac. Islander Research in Educ., *Federal Higher Education Policy Priorities and the Asian American and Pacific*

Islander Community 6 (2010). Those data stand in stark contrast to the educational achievement rates of Asian Americans with roots in China and India, who display relatively high rates of college entry and completion. *Ibid.*

Due in part to inequalities in educational opportunities among Asian American K-12 students, there are large disparities among different Asian American populations in rates of college attendance. One study derived from the Census Bureau's American Community Survey reveals that the majority of Asian American adults with Southeast Asian ethnicities (between 51 and 66%) did not attend college, while the same is true for a much smaller percentage (between 20 and 35%) of Asian Americans with South Asian and East Asian ethnicities. Nat'l Comm'n on Asian Am. & Pac. Islander Research in Educ., *The Relevance of Asian Americans and Pacific Islanders in the College Completion Agenda* 8 (2011). Even among Asian Americans who do attend college, a large proportion (47.3%) attend community colleges, contrary to the common racial stereotype suggesting that Asian Americans primarily attend elite private colleges. *Id.* at 9; Julie J. Park & Amanda E. Assalone, *Over 40%: Asian Americans and the Road(s) to Community Colleges*, 47 Cmty. College Rev. 274, 275 (2019).

Plaintiff thus errs in treating Asian American applicants to Harvard as a homogeneous block of high academic achievers from similar socioeconomic circumstances. The purpose of employing a whole-person review process like Harvard's is

to account for the diverse range of unique experiences—including the role race may have played in a person’s experience—among Americans of all races and backgrounds. There is no sound reason to ignore the equally diverse range of experiences *within* the group of Asian American applicants that Plaintiff purports to speak for. Differences in educational and economic opportunity, in social and familial circumstances, and in personal experiences of discrimination all inform a complete understanding of an individual applicant’s academic and nonacademic achievements. By employing a system that accounts for such differences on an individual level, Harvard is able to view each applicant’s talents, achievements, experiences, perspectives, and potential within the context of the applicant’s broader life experience—and to more accurately assess the contributions each applicant would likely make to the undergraduate population and experience.

C. Plaintiff’s Excessive Focus on Numerical Measures Ignores the Vast Differences in Experiences of Asian American Applicants.

Plaintiff puts too much emphasis on the fact that, on average, Asian Americans exhibit higher academic scores than other racial groups. A mean score within a group often conceals a great deal of variation, including vast differences in test score averages among ethnic sub-groups. Numbers on a page cannot fully capture the experience of an individual, let alone his or her potential to contribute to an educational community. Within the large group of academically qualified applicants, Harvard is entitled to ask, for example, whether a student with a 4.2 GPA who had

to take advanced math at a community college might have more to contribute to the Harvard community than a student with a 4.5 GPA who did not. Many qualified Asian American applicants who do not fit the stereotype of perfect test scores and perfect high school GPAs have the potential to make enormous contributions to the campus community—and those applicants benefit from holistic review processes like Harvard’s. Select quantifiable measures alone do not offer full, reliable, or valid measures of the diversity of achievements among the myriad talented applicants to Harvard.

Fundamentally, Plaintiff argues that the greater an applicant’s past academic success (assessed by limited metrics), the greater their chance of admission to Harvard *should be*. But that argument assumes that *Plaintiff’s* view of which personal qualities Harvard should value in the admissions process should prevail over *Harvard’s* view. If it wanted to, Harvard could admit a class comprising only students with perfect high school GPAs or perfect standardized test scores. That is not what Harvard seeks to do. Admission to Harvard College is not a reward for doing well in high school based on grades and test scores alone. Harvard seeks to build a community by choosing *among the thousands of academically qualified applicants* a diverse group of individuals who will learn from and challenge each other. Add. 24-25.

II. THE DISTRICT COURT CORRECTLY FOUND NO EVIDENCE OF DISCRIMINATION AGAINST ASIAN AMERICANS.

Plaintiff relies on misleading characterizations of Harvard’s use of a “personal rating” as a tool for enabling discrimination, refusing to recognize that the purpose of the personal rating is to take account of the full range of assets a student may contribute to the campus community. Although news outlets have mischaracterized the personal rating as a “personality” rating, *see, e.g.,* Anemona Hartocollis, *Harvard Rated Asian-American Applicants Lower on Personality Traits, Suit Says*, N.Y. Times, June 16, 2018, at A1, it is not an assessment of how sparkling or drab an applicant’s personality is. Far from it.

A. The Personal Rating Benefits All Students by Capturing the Diversity of Their Experiences.

The district court credited trial evidence that Harvard admissions officers do not consider race when assigning a personal rating. Add. 31, 45, 69, 125. Admissions committee members review applicant files containing myriad data—including personal statements, teacher and counselor recommendation letters, and notes from interviews—to assign a personal rating that acknowledges an applicant’s perspectives, interests, and talents that are not fully represented in other ratings. The personal rating reflects a range of qualities that are vital in determining an applicant’s potential to succeed and contribute while at Harvard and beyond—such as persistence in overcoming adversities, personal commitment to community, and potential

for future growth. The personal rating also allows Harvard’s admissions committee to account for the diversity of students’ academic and career interests. *See* Add. 20, 69-70; JA4590, JA934-JA937.

Trial testimony illustrated ways in which Asian American applicants benefit from Harvard’s approach to the personal rating. Harvard students Sally Chen and Thang Diep both testified and placed their Harvard applications into evidence. JA2673-JA2692, JA2729-JA2746. Each demonstrated academic qualification and highlighted their Asian American identities in their applications. JA2676-JA2677, JA2679-JA2680, JA2733-JA2737. Thang opened his personal statement by explaining that he “was no longer ashamed of [his] Vietnamese identity” because his high school “program allowed [him] to embrace it.” JA2679. Thang’s identity, experiences, and leadership in confronting racism as a low-income Vietnamese American immigrant were central to his successful application, even though his SAT score was “on the lower end of the Harvard average.” JA2679-JA2681. Sally Chen similarly did not have test scores stellar enough for her high school counselor to encourage her to apply to Harvard—but her admissions file noted that her Chinese American cultural background and engagements contributed to her sense of “responsibility to advoca[te]” and “speak[] up,” and bolstered her “Personal Qualities Rating,” and she testified that she “appreciated the ways in which [her] admissions reader saw what

[she] was trying to say when [she] was talking about the significance of growing up in a culturally Chinese home.” JA2736-JA2738.

B. Social Science Research Offers a Number of Nondiscriminatory Explanations for Differences Among Average Personal Ratings.

Plaintiff relies on an observed negative statistical correlation between Asian American identification and assigned personal ratings, arguing that the only possible explanation for that correlation is intentional anti-Asian discrimination by Harvard’s 40-member admissions committee. Pl.’s Br. 29-43. Plaintiff’s conclusion has no basis in logic, to say nothing of social science research or data, which offer key explanations for differences among average personal ratings across different racial groups.

1. Asian Americans Are More Likely to Attend Public High Schools, Where Larger Workloads Can Prevent Staff from Writing Strong Recommendation Letters.

The district court found that “[a]t least a partial cause of the disparity in personal ratings between Asian American and white applicants appears to be teacher and guidance counselor recommendations, with white applicants tending to score slightly stronger than Asian Americans on the school support ratings.” Add. 56; *id.* 67-68. The court explained that “teacher and guidance counselor recommendation letters are among the most significant inputs for the personal rating”—and that “ap-

parent race-related or race-correlated difference[s] in the strength of guidance counselor and teacher recommendations” are “significant” in understanding any observed disparity in personal-rating trends. Add. 71.

Racial differences in high school enrollment patterns can help explain differences in recommendations and in average personal ratings. “Among Ivy League applicants, Asian Americans are more likely to attend public schools where the counselor to student ratios are usually quite large, possibly resulting in less personalized or enthusiastic recommendations from counselors.” Julie J. Park & Sooji Kim, *Harvard’s Personal Rating: The Impact of Private High School Attendance*, 30 *Harvard Asian Am. Policy Rev.* (forthcoming 2020) (manuscript at 1).⁶ Although only 56% of white applicants to hyper-selective universities like Harvard attended public high schools, 75% of Asian Americans with elite university aspirations did. *Ibid.*

Because counselors and teachers at large public high schools have heavier workloads than their counterparts at private high schools, they have less time to offer in-depth letters of recommendation for each student. ROBERT T. TERANISHI, *ASIANS IN THE IVORY TOWER: DILEMMAS OF RACIAL INEQUALITY IN AMERICAN HIGHER EDUCATION* 78-79 (2010); Ashley B. Clayton, *Helping Students Navigate the College*

⁶ Available at <https://juliepark.files.wordpress.com/2020/04/harvard-ruling-aapr-in-press.pdf>.

Choice Process: The Experiences and Practices of College Advising Professionals in Public High Schools, 42 Rev. Higher Educ. 1401, 1404-1405 (2019). As the National Association for College Admissions Counseling stated in 2019, “48 percent of private schools reported that they employed at least one counselor (full- or part-time) whose sole responsibility was to provide college counseling for students, compared to only 29 percent of public schools.” Melissa Clinedinst, *State of College Admission* 19 (2019).⁷ School “counseling staff at private schools spent an average of 31 percent of their time on college counseling, while counselors at public schools spent only 19 percent of their time on that task.” *Ibid.* In private high schools, the student-to-teacher ratio is 11.9 to 1; in public schools, it is 16.2 to 1. Ke Wang et al., U.S. Dep’t of Educ., *School Choice in the United States: 2019*, at 20 (2019).⁸ The smaller average workload for teachers and counselors at private schools allows them to spend more time drafting letters of recommendation with greater depth than their counterparts in public schools. In turn, higher quality letters from private schools make it more likely that private school students—who are less likely to be Asian American—will receive higher school support ratings, which are key to Harvard’s assignment of personal ratings. Add. 56, 68-71.

⁷ Available at https://www.nacacnet.org/globalassets/documents/publications/research/2018_soca/soca2019_all.pdf.

⁸ Available at <https://nces.ed.gov/pubs2019/2019106.pdf>.

2. *Asian Americans Are More Likely to Apply to Highly Selective Colleges Like Harvard.*

Differences in application patterns can also explain the marginal differences in personal ratings. Asian American students are more likely than students of other racial and ethnic groups to apply to highly selective universities. Brian P. An, *The Relations Between Race, Family Characteristics, and Where Students Apply to College*, 39 Soc. Sci. Res. 310, 317 (2010); see Add. 82. Asian American students, particularly those from high- and middle-income families, are more likely to apply to more colleges than the national average. See MITCHELL J. CHANG ET AL., BEYOND MYTHS: THE GROWTH AND DIVERSITY OF ASIAN AMERICAN COLLEGE FRESHMAN, 1971-2005, at 16 (2007). Recent research shows that 60.77% of Asian American college applicants' "first-choice college was a highly selective, four-year institution, which was 1.6 times higher than that of white students, about 2.6 times higher than African-American students, and about twice as high as Latinx students." Michael Bastedo & Sooji Kim, "Who gets their first choice?" *Race and Class Differences in College Admissions Outcomes* 4 (2020).⁹ Among those Asian American applicants, aspirations of attending highly selective four-year institutions differ by ethnicity: Among the students surveyed in the High School Longitudinal Study in 2009,

⁹ Available at <http://www-personal.umich.edu/~bastedo/papers/BastedoKim.AER.A2020.pdf>.

71.08% of Chinese Americans and 66.46% of South Asian Americans applied to highly selective four-year institutions, while only 48.99% of Filipinx Americans and 37.5% of Southeast Asian Americans did so. *Id.* at 3, 12 tbl.11.

Research shows that Asian American applicants, especially those who identify as East Asian, are more likely than white applicants to prefer being a lower-performing student in a higher-status university than to be a higher-performing student in a lower-status university. *See* Kaidi Wu et al., *Frogs, Ponds, and Culture: Variations in Entry Decisions*, 9 *Soc. Psychol. & Personality Sci.* 99, 101 (2018). Research on application patterns by race suggests that Asian Americans may be more likely than other students to fill out an application to Harvard even if Harvard may not be the best fit—and that the cross-section of Asian American students who apply to Harvard is likely to be materially different from the cross-section of applicants of other ethnicities. *See* JULIE J. PARK, *RACE ON CAMPUS: DEBUNKING MYTHS WITH DATA* 90-91 (2018). Because a disproportionate number of Asian American students apply to Harvard every year, it is no surprise that many of them—like many high achieving students of all races and ethnicities—do not receive the highest possible personal rating at Harvard, which rejects approximately 95% of applicants every year.

C. Plaintiff's Arguments Are Based on Racial Stereotypes About Asian Americans.

Plaintiff argues that Asian Americans demonstrate higher academic ratings than all other groups because Asian Americans possess “traits” that include “better grades, better test scores, [and] better scores on AP exams.” Pl.’s Br. 36. That assertion rests on a racial stereotype about Asian Americans as a so-called Model Minority. That stereotype advances the views (1) that Asian Americans are smarter and value education more than other groups and (2) that other racial minorities do not value hard work and education. *See, e.g.,* Yoon K. Pak et al., *Asian Americans in Higher Education: Charting New Realities* 17, 40 (2014); OiYan Poon et al., *A Critical Review of the Model Minority Myth in Selected Literature on Asian Americans and Pacific Islanders in Higher Education*, 86 *Rev. Educ. Res.* 469, 473-476 (2016). The Model Minority myth ignores the historical and social forces that drive Asian American academic achievement and reinforces negative stereotypes about other racial minorities.

1. Selective Immigration Policies, Not Innate Ability, Explain Key Academic Differences Between Asian Americans and Other Racial and Ethnic Groups.

Sociologists Jennifer Lee and Min Zhou have identified the key historical and social mechanisms that account for differences in GPA and test scores between Asian Americans and other racial groups. *See generally* JENNIFER LEE & MIN ZHOU, *THE ASIAN AMERICAN ACHIEVEMENT PARADOX* (2015). Lee and Zhou provide

strong evidence from quantitative and other sources of empirical data that Asian American academic achievement “cannot be explained by superior traits intrinsic to Asian culture or by the greater value that Asians place on education or success.” *Id.* at 7. The first set of factors stems from U.S. immigration policies and the “hyperselecti[on]” of immigrants from Asia. *Id.* at 7, 20-30. They document why the typical immigrant admitted to the United States from China is much more likely to have a college degree than both the average U.S. resident *and* the average resident in China. *Id.* at 30; Carlos Echeverria-Estrada & Jeanne Batalova, *Chinese Immigrants in the United States*, Migration Info. Source (Jan. 15, 2020).¹⁰ In contrast, the typical immigrant admitted to the United States from Mexico is *less* likely than the typical Mexican resident to hold a college degree. THE ASIAN AMERICAN ACHIEVEMENT PARADOX, *supra*, at 29.

Building on decades of scholarship in Asian American Studies to illuminate the historical and social origins of the Asian American educational achievement advantage, Lee and Zhou’s research reveals that Asian Americans’ notable educational success (on average) is not attributable to innate ability or inherent cultural attitude,

¹⁰ Available at <https://www.migrationpolicy.org/article/chinese-immigrants-united-states>.

but to context, including immigration policies that select for highly-educated immigrants from certain Asian countries. *See, e.g.,* Jane Junn, *From Coolie to Model Minority: U.S. Immigration Policy and the Construction of Racial Identity*, 4 Du Bois Rev. 355, 362-365, 368 (2007).

Selective immigration policies extend prior to the Immigration and Nationality Act of 1965, Pub. L. No. 89-236, 79 Stat. 911, which ended Asian exclusion and created two immigration priorities: highly valued skills and family reunification. *E.g.,* Jennifer Lee & Min Zhou, *From Unassimilable to Exceptional: The Rise of Asian Americans and “Stereotype Promise,”* 16 *New Diversities*, no. 1, 2014, at 7, 11-13; Madeline Y. Hsu & Ellen D. Wu, “*Smoke and Mirrors*”: *Conditional Inclusion, Model Minorities, and the Pre-1965 Dismantling of Asian Exclusion*, *J. Am. Ethnic Hist.*, Summer 2015, at 43, 53-54. Around the turn of the 20th Century, the United States began to carve out limited exceptions to its widespread formal exclusion of Chinese immigrants for Chinese university students. *See* MADELINE Y. HSU, *THE GOOD IMMIGRANTS: HOW THE YELLOW PERIL BECAME THE MODEL MINORITY* 47-48 (2015). After 1965, the United States started recruiting highly educated, skilled immigrants from Asia in greater numbers than ever before through employment-based preferences. Arun Peter Lobo & Joseph J. Salvo, *Changing U.S. Immigration Law and the Occupational Selectivity of Asian Immigrants*, 32 *Int’l Migration Rev.* 737, 758 (1998). Those efforts were ramped up after 1990, and more than

half of the Asian American population in the United States has immigrated since then. Muzaffar Chishti & Stephen Yale-Loehr, Migration Policy Inst., *The Immigration Act of 1990: Unfinished Business a Quarter-Century Later 2* (2016). In recent years, more than 70% of all high-skilled visas have been allocated to immigrants from Asia. U.S. Citizen & Immigration Servs., *Characteristics of H1B Specialty Occupation Workers: Fiscal Year 2012 Annual Report to Congress, October 1, 2011-September 30, 2012*, at 6 (2013). And most international student visas now go to Asian immigrants. Neil G. Ruiz, *The Geography of Foreign Students in U.S. Higher Education: Origins and Destinations* 10 (Aug. 2014).

The United States' hyper-selective recruitment of Asian immigrants challenges the stereotype that the success of Asian Americans in the United States is due to innate intellect or ingrained cultural characteristics. If that were true, we would expect to see the same kinds of educational achievement in Asia as in the United States. We do not. In 2015, more than 50% of Chinese immigrants in the United States had a bachelor's degree but only 4% of adults in China did. Jennifer Lee, *From Undesirable to Marriageable: Hyper-Selectivity and the Racial Mobility of Asian Americans*, *Annals Am. Acad. Pol. & Soc. Sci.*, Nov. 2015, at 79, 82. Similarly, although approximately 70% of Indian immigrants in the United States have a bachelor's degree, less than 15% of college-aged adults in India enroll in college.

Rema Nagarajan, *Only 10% of Students Have Access to Higher Education in Country*, Times of India (Jan. 5, 2014); *From Unassimilable to Exceptional*, *supra*, at 25. Thus, Asian Americans' educational achievement traces to U.S. immigration policies and other contextual factors, not to inherent qualities tied to race.

2. *Asian Americans Benefit from Presumed Advantages that Can Positively Influence Their Academic Rating.*

While the “Model Minority” stereotype has serious documented downsides, the presumed academic competence it ascribes to Asian Americans may artificially boost the academic performance of all Asian American students, while doing the opposite for members of other racial minority groups. *See Unassimilable to Exceptional*, *supra*, at 9, 16-19. Although all stereotypes are harmful, Asian Americans are the only group able to leverage a stereotype into “symbolic capital” when it comes to education: “[T]he positive perceptions of Asian American students by their teachers, guidance counselors, and school administrators manifest as a form of symbolic capital that positively affects the grades they receive, the extra help they are offered with their coursework, and the encouragement they receive when they apply to college.” THE ASIAN AMERICAN ACHIEVEMENT PARADOX, *supra*, at 118. Asian Americans are more likely to be placed in AP classes and special programs for the gifted, which are “invaluable institutional resources that are not equally available to all students, especially to Latin[x] and African American students.” *Ibid*. In addition, “stereotype promise” can spur Asian American students to perform at higher

levels than they would without the positive views and support of teachers. *Id.* at 125.

Ultimately, Harvard’s academic rating is not the “objective” score that Plaintiff would have this Court believe. Pl.’s Br. 4. The academic ratings themselves—and the underlying academic data—may reflect implicit biases that align with “stereotype promise.” Consistent with that view, a large body of research shows that grades and standardized test scores are not impartial measures of academic talent. Data from the organizations that sponsor standardized admissions tests show that scores are in large part a reflection of parental education and family income. Krista Mattern et al., ACT, Inc., *ACT Composite Score by Family Income* 1 (2016); College Board, *2017 SAT Suite of Assessments Annual Report, Total Group 3* (2017); see also Greg J. Duncan & Richard J. Murnane, *Growing Income Inequality Threatens American Education*, *Kappan Mag.*, Mar. 2014, at 8, 10. And Asian Americans on average exhibit the highest group levels for educational access, parental education, and income. Pew Research Ctr., *The Rise of Asian Americans* 2 (Apr. 4, 2013). Levels of family income and parental education vary across the Asian American community, but on average, those features help, rather than hurt, Asian American students.

Perhaps acknowledging the flaws of tests like the SAT and ACT, more than 1,000 accredited institutions of higher education have announced that they do not

require standardized tests as part of their admissions practices.¹¹ That trend recognizes the limitations of such tests as measures of academic quality among prospective students.

Teachers' assessments of students, too, are subject to biases, which affect GPAs. Scholarship on implicit bias shows that teachers have higher expectations for white and Asian Americans students than for Black and Latinx students. *See generally* Harriet R. Tenenbaum & Martin D. Ruck, *Are Teachers' Expectations Different for Racial Minority than for European American students? A Meta-Analysis*, 99 *J. Educ. Psychol.* 253 (2007). A study of more than 10,000 high school sophomores and their teachers found that math and English teachers dramatically underestimated the academic abilities of Black and Latinx students with similar test scores and homework completion as their white peers, and that those lower expectations affected student outcomes, including GPA. Hua-Yu Sebastian Cherng, *If They Think I Can: Teacher Bias and Youth of Color Expectations and Achievement*, 66 *Social Sci. Res.* 170, 179-180, 179 tbl.6 (2017).

¹¹ FairTest, *1,200+ Accredited 4-Year Colleges and Universities with ACT/SAT-Optional Policies (for Fall 2021 Admission)*, <https://www.fairtest.org/university/optional> (last visited May 14, 2020).

Importantly, by relying on positive stereotypes of Asian Americans' educational abilities and values, Plaintiff subtly leverages negative stereotypes about African American and Latinx students' educational experience. By assuming that higher average standardized test scores and grades among Asian Americans necessarily result from unique individual effort, Plaintiff implies that lower average scores of other racial minorities stem from a lack of individual effort. That strategy capitalizes on documented racial stereotypes. Although research shows that a larger percentage of Latinx and African American students believe a college degree is necessary for success than their white counterparts, Ronald Brownstein, *White People Are Skeptical About the Value of a College Degree*, Atlantic (Nov. 7, 2013), a national study of white students attending elite colleges showed they were more likely to view Asian Americans as "hard working," "intelligent," and more willing to "persevere[]" than African American and Latinx students—and were more likely to attribute African American and Latinx individuals' lack of social mobility to a lack of individual effort rather than to structural racial inequality. Jerry Z. Park et al., *Exceptional Outgroup Stereotypes and White Racial Inequality Attitudes Toward Asian Americans*, 78 Soc. Psychol. Q. 399, 404-405 (2015).

III. RACE-CONSCIOUS POLICIES PREVENT HARM TO ASIAN AMERICAN APPLICANTS.

A. Failing to Consider Race as One of Many Factors in Admissions Would Harm Asian American Applicants.

As the district court concluded, “[r]emoving considerations of race and ethnicity from Harvard’s admissions process entirely would deprive applicants, including Asian Americans, of their right to advocate the value of their unique background, heritage, and perspective and would likely also deprive Harvard of exceptional students who would be less likely to be admitted without a comprehensive understanding of their background.” Add. 111. Such a restriction would limit the ability of colleges and universities to build a truly diverse class of students and “to pursue the educational benefits that flow from student body diversity.” *Fisher v. Univ. of Texas*, 136 S. Ct. 2198, 2208 (2016) (internal quotation marks omitted).

Removing Harvard’s limited consideration of race as one of many factors would also invite bias. Social science research—and common sense—overwhelmingly indicates that few aspects of any child’s educational journey remain untouched by racial biases. Plaintiff’s contention that the *only* way to mitigate such biases is to remove race as a consideration from Harvard’s admissions process defies logic. Eliminating any awareness of race in admissions would only perpetuate the biases described above. See Elise C. Boddie, *Critical Mass and the Paradox of Colorblind Individualism in Equal Protection*, 17 U. Pa. J. Const. L. 781, 781-783, 790-803

(2015); Liliana M. Garces & Courtney D. Cogburn, *Beyond Declines in Student Body Diversity: How Campus-Level Administrators Understand a Prohibition on Race-Conscious Postsecondary Admissions Policies*, 52 Am. Educ. Res. J. 828, 849-855 (2015); Jeffrey F. Milem et al., *Making Diversity Work on Campus: A Research-Based Perspective* iv (2005).¹²

B. A Large Majority of Asian Americans Support Race-Conscious Admissions Policies.

Although Plaintiff purports to speak for Asian Americans, its position is out of step with the views of Asian Americans as a community. A number of studies, conducted in multiple Asian languages and including an array of different Asian national-origin groups, confirm that Asian Americans as a whole support the use of race-conscious admissions practices. That support likely reflects the benefits that Asian American applicants reap from processes that evaluate them as individuals.

Social-science data confirm that a majority of Asian Americans support race-conscious admissions. Multiple surveys conducted between 2001 and 2016 of Asian American adults in at least five different national-origin groups have asked whether race-conscious admissions measures are good or bad for Asian Americans or whether the respondents support such programs. And each of those surveys has revealed strong support for such programs among Asian Americans—support ranging

¹² Available at https://www.aacu.org/sites/default/files/files/mei/milem_et_al.pdf.

from 61% to 70%. Pei-te Lien et al., *The Politics of Asian Americans: Diversity and Community* 17, 191 (2004); AAPIData et al., *Inclusion, Not Exclusion: Spring 2016 Asian American Voter Survey A25* (2016); AAPIData et al., *An Agenda for Justice: Contours of Public Opinion Among Asian Americans* 8-9 (2014); Nat'l Asian Am. Survey, *Where Do Asian Americans Stand on Affirmative Action?* 1-2 (June 24, 2013). Exit-poll data also reveal strong opposition (between 61% and 75%) among Asian American voters to ending affirmative action programs. *State Propositions: A Snapshot of Voters*, L.A. Times (Nov. 7, 1996); Press Release, Asian American Legal Defense and Education Fund, AALDEF Exit Poll of 4,600 Asian American Voters Reveals Robust Support for Democratic Candidates in Key Congressional and Senate Races (Nov. 9, 2006). Even Asian American opponents of race-conscious admissions policies support principles of whole-person review like the one at Harvard. OiYan Poon et al., *Asian Americans, Affirmative Action, and the Political Economy of Racism: A Multidimensional Model of Racial Ideologies* 23 (Nov. 2017).

Plaintiff's narrative in this case does not reflect concerns actually held by Asian Americans as a community. It is therefore no surprise that Plaintiff was unable to "present a single admissions file that reflected any discriminatory animus, or even an application of an Asian American who it contended should have or would have been admitted absent an unfairly deflated personal rating." Add. 112.

CONCLUSION

Harvard's whole-person review treats each individual as an individual, not merely as a member of a racial group with presumed qualities and characteristics. That approach is well-grounded in social science research and benefits Asian American applicants. The district court correctly rejected Plaintiff's arguments to the contrary.

May 21, 2020

Respectfully submitted,

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May 21, 2020

/s/ Sarah E. Harrington
SARAH E. HARRINGTON

PROOF OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the First Circuit by using the appellate CM/ECF system on May 21, 2020. All participants in the case are registered CM/ECF users, and service will be accomplished by the appellate CM/ECF system.

May 21, 2020

/s/ Sarah E. Harrington
SARAH E. HARRINGTON

APPENDIX

Name	College/University or Organization
1. Abajian, Suzie	Orange County Department of Education
2. Abrajano, Marisa	University of California, San Diego
3. Acevedo-Gil, Nancy	California State University, San Bernardino
4. Adamian, Annie	California State University, Chico
5. Adiredja, Aditya	University of Arizona
6. Affigne, Tony	Providence College
7. Agius Vallejo, Jody	University of Southern California
8. Aguilar-Hernández, José M.	California State Polytechnic University, Pomona
9. Agzino, Onwubiko	Virginia Polytechnic Institute and State University
10. Alcantar, Cynthia	University of Nevada, Reno
11. Aldana, Ursula	University of San Francisco
12. Ali, Arshad	The George Washington University
13. Alvarez, Robert	University of California, San Diego
14. Ampaw, Frimpomaa	Central Michigan University
15. Ananth, Akhila	California State University, Los Angeles
16. Andrzejewski, Carey	Auburn University
17. Annamma, Subini	Stanford University
18. antonio, anthony lising	Stanford University
19. Aoki, Andrew	Augsburg University
20. Applebaum, Barbara	Syracuse University
21. Aptekar, Sofya	University of Massachusetts Boston
22. Archer, David Eric	Western Michigan University
23. Arellano, Adele	California State University, Sacramento
24. Arthur, Mikaila	Rhode Island College
25. Ashlee, Aerial	St. Cloud State University
26. Assalone, Amanda	University of Tennessee, Knoxville
27. Au, Wayne	University of Washington - Bothell
28. Austin, Algernon	Thurgood Marshall Institute
29. Baber, Lorenzo	Loyola University Chicago
30. Bahena, Sofia	University of Texas at San Antonio
31. Baker, Dominique	Southern Methodist University
32. Ballysingh, Tracy	University of Vermont
33. Bang, Megan	Northwestern University
34. Barajas, Manuel	California State University, Sacramento
35. Barnhardt, Cassie	University of Iowa
36. Barone, Ryan	Colorado State University
37. Basile, Vincent	Colorado State University
38. Bastedo, Michael	University of Michigan
39. Bates, Abigail	Independent Scholar
40. Bazner, Kevin	Texas A&M University - College Station
41. Beatty, Cameron	Florida State University
42. Benavides Lopez, Corina	California State University, Dominguez Hills
43. Bengochea, Alain	University of Nevada, Las Vegas
44. Bensimon, Estela	University of Southern California
45. Bertrand, Melanie	Arizona State University

Name	College/University or Organization
46. Bertrand Jones, Tamara	Florida State University
47. Bettencourt, Genia	University of Massachusetts Amherst
48. Beyerlein, Michael	Texas A&M University - College Station
49. Bhattacharya, Kakali	University of Florida
50. Bhattar, Raja	Independent Scholar
51. Block, Ray	Pennsylvania State University
52. Blockett, Reginald	Grand Valley State University
53. Bloom-Leiva, Gilda	San Francisco State University
54. Bondi, Stephanie	University of Nebraska
55. Boris, Eileen	University of California, Santa Barbara
56. Borja, Melissa	University of Michigan
57. Boscardin, Christy	University of California, San Francisco
58. Bowman, Nicholas	University of Iowa
59. Bowman, Phillip	University of Michigan
60. Brodtkin, Karen	University of California, Los Angeles
61. Broido, Ellen	Bowling Green State University
62. Buenavista, Tracy	California State University, Northridge
63. Bui, Long	University of California, Irvine
64. Bukoski, Beth	University of Texas at Austin
65. Bullock, Erika	University of Wisconsin - Madison
66. Burciaga, Rebeca	San José State University
67. Burnett, Ann	North Dakota State University
68. Byrd, Ajani	Mission College
69. Byrd, Carson	University of Louisville
70. Cabrera, Nolan	University of Arizona
71. Cain, Ebony	Pepperdine University
72. Calderon, Dolores	Western Washington University
73. Calderon, Maria	University of Maryland, College Park
74. Camacho, Keith	University of California, Los Angeles
75. Camarillo, Albert	Stanford University
76. Canino Arroyo, Maria Josefa	Rutgers University
77. Cantor, Nancy	Rutgers University-Newark
78. Cantwell, Brendan	Michigan State University
79. Carmona, Josefina	New Mexico State University- Dona Ana Community College
80. Carter, Deborah	Claremont Graduate University
81. Castro Samayoa, Andres	Boston College
82. Catalano, Chase	Virginia Polytechnic Institute and State University
83. Chambers, Crystal	East Carolina University
84. Chan, Jason	Haverford College
85. Chan-Malik, Sylvia	Rutgers University
86. Chang, Aurora	Loyola University Chicago
87. Chang, Benji	University of North Carolina at Greensboro
88. Chang, Mitchell	University of California, Los Angeles
89. Chao Romero, Robert	University of California, Los Angeles

Name	College/University or Organization
90. Cheah, Charissa	University of Maryland, Baltimore County
91. Chen, Anthony	Northwestern University
92. Chen, Carolyn	University of California, Berkeley
93. Chen, Edith	California State University, Northridge
94. Chen, Jondou	University of Washington
95. Chen, Stephanie	Wright Institute
96. Cheng, Jih-Fei	Scripps College
97. Cheng, John	Binghamton University
98. Cheng, Wendy	Scripps College
99. Cherng, Hua-Yu Sebastian	New York University
100. Cheung, Christabel	University of Maryland, Baltimore
101. Chhuon, Vichet	University of Minnesota
102. Chiang, Warren	Stanford University
103. Chikkatur, Anita	Carleton College
104. Chin, Christina	California State University, Fullerton
105. Ching, Cheryl	University of Massachusetts Boston
106. Chong, Chinbo	Princeton University
107. Chung, Angie	University at Albany
108. Clark, Christine	University of Nevada, Las Vegas
109. Clealand, Danielle	Florida International University
110. Clutario, Genevieve	Wellesley College
111. Cobb, Casey	University of Connecticut
112. Cobian, Krystle	University of California, Los Angeles
113. Cokley, Kevin	University of Texas at Austin
114. Collins, Christopher	Azusa Pacific University
115. Collins, Jonathan	Brown University
116. Coloma, Roland Sintos	Wayne State University
117. Comeaux, Eddie	University of California, Riverside
118. Correia-Harker, Benjamin	Marquette University
119. Cradit, Nathaniel	National Louis University
120. Crisp, Gloria	Oregon State University
121. Croom, Natasha	Clemson University
122. Cross, Jr., William E.	University of Denver
123. Cruz, Cindy	University of Arizona
124. Cuellar, Marcela	University of California, Davis
125. Curammeng, Edward	California State University, Dominguez Hills
126. Curry, Mary Jane	University of Rochester
127. Dache, Amalia	University of Pennsylvania
128. Danico, Mary Yu	California State Polytechnic University, Pomona
129. Dao, Loan	Saint Mary's College of California
130. Darity Jr., William	Duke University
131. Darling-Hammond, Linda	Stanford University
132. Davis, Tracy	Western Illinois University
133. Davis III, Charles H.F.	University of Michigan
134. Deal, Kristin	University of Denver

Name	College/University or Organization
135. DeAngelo, Linda	University of Pittsburgh
136. Decker, Janet	Indiana University Bloomington
137. Deckman, Sherry	Lehman College, City University of New York
138. deGuzman, Jean-Paul	University of California, Los Angeles
139. Demessie, Menna	University of Michigan
140. Deo, Meera E	University of California, Davis
141. Dhingra, Pawan	Amherst College
142. Diamond, John	University of Wisconsin - Madison
143. Diem, Sarah	University of Missouri
144. Dockendorff, Kari	Colorado State University
145. Dougherty, Kevin	Columbia University
146. Drezner, Noah	Columbia University
147. DuCros, Faustina	San José State University
148. Duran, Antonio	Auburn University
149. Dwyer, Brigid	Princeton University
150. Eaton, Susan	Brandeis University
151. Edejer, Eilene	Loyola University Chicago
152. Edwards, Kirsten	University of Oklahoma
153. Eisenhart, Margaret	University of Colorado Boulder
154. Elkins, Becki	University of Wisconsin-La Crosse
155. Embley, Charity	Odessa College
156. Embrick, David	University of Connecticut
157. Endo, Rachel	University of Washington - Tacoma
158. Engberg, Mark	University of Denver
159. Erevelles, Nirmala	University of Alabama
160. Eshleman, Amy	Wagner College
161. Espino, Michelle	University of Maryland, College Park
162. Estrada, Mica	University of California, San Francisco
163. Evans, Nancy	Iowa State University
164. Fabian, Cathryn	Madonna University
165. Faircloth, Susan	Colorado State University
166. Farrell-Cole, Patricia	Van Andel Institute
167. Felder Small, Pamela	Black Doctorates Matter
168. Fernandez, Frank	University of Mississippi
169. Fierros, Edward	Villanova University
170. Fine, Michelle	The Graduate Center, City University of New York
171. Fischman, Gustavo	Arizona State University
172. Fishman, Seth Matthew	Villanova University
173. Fiske, Susan	Princeton University
174. Flores, Lisa	University of Missouri
175. Folk, Amanda	The Ohio State University
176. Ford, Karly	Pennsylvania State University
177. Foste, Zak	University of Kansas
178. Francisco-Menchavez, Valerie	San Francisco State University
179. Frankenberg, Erica	Pennsylvania State University

Name	College/University or Organization
180. Frasure, Lorrie	University of California, Los Angeles
181. Freeman, Jr., Sydney	University of Idaho
182. Freer, Regina	Occidental College
183. French, Amy	Indiana State University
184. Friedensen, Rachel	St. Cloud State University
185. Fries-Britt, Sharon	University of Maryland, College Park
186. Fujimoto, Eugene	California State University, Fullerton
187. Fultz, Michael	University of Wisconsin - Madison
188. Furr, Sara	University of Chicago
189. Gándara, Patricia	University of California, Los Angeles
190. Gans, Herbert	Columbia University
191. Garces, Liliana M.	University of Texas at Austin
192. Garcia, Gina	University of Pittsburgh
193. Garcia, Hugo	Texas Tech University
194. Garcia, Kristina	University of Illinois at Chicago
195. Garcia Bedolla, Lisa	University of California, Berkeley
196. Garibay, Juan	University of Virginia
197. Garvey, Jay	University of Vermont
198. George Mwangi, Chrystal	University of Massachusetts Amherst
199. Geron, Kim	California State University, East Bay
200. Giani, Matthew	University of Texas at Austin
201. Gildersleeve, Ryan	University of Denver
202. Gillon, Kathleen	University of Maine
203. Gilmore, Ruth Wilson	The Graduate Center, City University of New York
204. Gin, Kevin	Holy Names University
205. Ginsberg, Ricki	Colorado State University
206. Gonzales, Leslie	Michigan State University
207. Gonzalez, Amber	California State University, Sacramento
208. Gonzalves, Theodore	Association for Asian American Studies
209. Gooding, Cory	University of San Diego
210. Gordon, Hava	University of Denver
211. Goyette, Kimberly	Temple University
212. Grande, Sandy	Connecticut College
213. Gregory, Dennis	Old Dominion University
214. Grewal, Zareena	Yale University
215. Griffin, Kimberly	University of Maryland, College Park
216. Guerrero, Armando	University of California, Los Angeles
217. Guido, Florence M.	University of Northern Colorado
218. Gutierrez, Kris	University of California, Berkeley
219. Hackshaw, Alana	University of Maryland, College Park
220. Hagedorn, Linda Serra	Iowa State University
221. Hailu, Meseret	Arizona State University
222. Hakuta, Kenji	Stanford University
223. Hall, Gordon	University of Oregon
224. Hancock Alfaro, Ange-Marie	University of Southern California

Name	College/University or Organization
225. Hardie, Jessica	Hunter College, City University of New York
226. Harpalani, Vinay	University of New Mexico
227. Harper Morris, Casandra	University of Missouri
228. Harris, Michael	Southern Methodist University
229. Harris III, Frank	San Diego State University
230. Hart, Jeni	University of Missouri
231. Hartlep, Nicholas	Berea College
232. Haslerig, Siduri	University of Oklahoma
233. Hatch-Tocaimaza, Deryl	University of Nebraska
234. Heller, Donald	University of San Francisco
235. Hernandez, Edwin	California State University, San Bernardino
236. Hernandez, Xavier	University of California, Irvine
237. Hernández, Estee	Texas Christian University
238. Heubert, Jay	Columbia University
239. Higginbotham, Evelyn Brooks	Harvard University
240. Hikida, Michiko	The Ohio State University
241. Hillman, Nicholas	University of Wisconsin - Madison
242. Hirschman, Daniel	Brown University
243. Holley, Susan	Texas A&M University
244. Holme, Jennifer	University of Texas at Austin
245. Horn, Catherine	University of Houston
246. Hornak, Anne	Central Michigan University
247. HoSang, Daniel	Yale University
248. Houston, Derek	University of Oklahoma
249. Howard, Tiffany	University of Nevada, Las Vegas
250. Howes, Carollee	University of California, Los Angeles
251. Howes, Shannon	Loyola University Chicago
252. Hsieh, Betina	California State University, Long Beach
253. Hsin, Amy	Queens College, City University of New York
254. Hsu, Madeline	University of Texas at Austin
255. Hudson, Tara	Kent State University
256. Huerta, Adrian	University of Southern California
257. Hughes, Bryce	Montana State University
258. Hum, Tarry	Queens College, City University of New York
259. Hunt, Darnell	University of California, Los Angeles
260. Hunter, Evelyn	Auburn University
261. Huo, Yuen	University of California, Los Angeles
262. Hurtado, Sarah	University of Denver
263. Hurtado, Sylvia	University of California, Los Angeles
264. Hutchings, Vincent	University of Michigan
265. Ishimaru, Ann	University of Washington
266. Iverson, Susan	Manhattanville College
267. Jain, Dimpal	California State University, Northridge
268. Jardina, Ashley	Duke University
269. Jayakumar, Uma	University of California, Riverside

Name	College/University or Organization
270. Jennings, Louise	Colorado State University
271. Jeung, Russell	San Francisco State University
272. Johnson, Jennifer	Temple University
273. Johnson, Matthew	Central Michigan University
274. Johnston-Guerrero, Marc	The Ohio State University
275. Jones, Nikki	University of California, Berkeley
276. Jones-Correa, Michael	University of Pennsylvania
277. Joshi, Khyati	Fairleigh Dickinson University
278. Jourian, T.J.	Trans*Formational Change, LLC
279. Junn, Jane	University of Southern California
280. Kadaba, Meiyang	Wright Institute
281. Kamimura, Aurora	Washington University in St. Louis
282. Kanagala, Vijay	Salem State University
283. Kang, Miliann	University of Massachusetts Amherst
284. Karen, David	Bryn Mawr College
285. Kelly, Bridget	University of Maryland, College Park
286. Ken, Ivy	The George Washington University
287. Kezar, Adrianna	University of Southern California
288. Kiang, Peter	University of Massachusetts Boston
289. Killen, Melanie	University of Maryland
290. Kim, Barbar	California State University, Long Beach
291. Kim, David Kyuman	Stanford University
292. Kim, Jung	Lewis University
293. Kim, Nadia	Loyola Marymount University
294. Kim, Richard	University of California, Davis
295. Kim, Rose M.	Borough of Manhattan Community College, City University of New York
296. Kim, Soo Mee	California State University, Los Angeles
297. Kim, Stephanie	Georgetown University
298. Kimball, Ezekiel	University of Massachusetts Amherst
299. King, M Bruce	University of Wisconsin - Madison
300. King, Patricia	University of Michigan
301. Kinzie, Jillian	Indiana University Bloomington
302. Knaus, Christopher	University of Washington - Tacoma
303. Ko, Cynya Michelle	Columbia University
304. Kodama, Corinne	University of Illinois at Chicago
305. Kohli, Rita	University of California, Riverside
306. Kokka, Kari	University of Pittsburgh
307. Kondo, Dorinne	University of Southern California
308. Kornhaber, Mindy	Pennsylvania State University
309. Kortegast, Carrie	Northern Illinois University
310. Kumashiro, Kevin	Independent Scholar
311. Kwan, Yvonne	San José State University
312. Kwon, Yaejoon	Reed College
313. Lai, James	Santa Clara University

Name	College/University or Organization
314. Langhout, Regina	University of California, Santa Cruz
315. Lau, Anna	University of California, Los Angeles
316. Laus, Vincent	California State University, Stanislaus
317. Le, C.N.	University of Massachusetts Amherst
318. Lechuga, Vicente	Texas A&M University - College Station
319. Ledesma, María	University of Utah
320. Lee, Amy	University of Minnesota
321. Lee, C. Aujean	University of Oklahoma
322. Lee, Fred	University of Connecticut
323. Lee, Jennifer	Columbia University
324. Lee, Richard	University of Minnesota
325. Lee, Robert	Brown University
326. Lee, Stacey	University of Wisconsin-Madison
327. Lee, Taeku	University of California, Berkeley
328. Lee, Ung-Sang	University of California, Los Angeles
329. Lehman, Kathleen	University of California, Los Angeles
330. Lehr, Jane	California Polytechnic State University, San Luis Obispo
331. Leung, Genevieve	University of San Francisco
332. Leung, Maxwell	California College of the Arts
333. Lewis, Amanda	University of Illinois at Chicago
334. Lewis, Consuella	Concordia University Portland
335. Lien, Pei-Te	University of California, Santa Barbara
336. Liera, Roman	University of Southern California
337. Linde, Robyn	Rhode Island College
338. Lipson, Daniel	Sacramento State
339. Liu, Rossina Zamora	University of Maryland, College Park
340. Lizardy-Hajbi, Kristina	Illiff School of Theology
341. Locks, Angela	California State University, Long Beach
342. Longerbeam, Susan	University of Louisville
343. Lopez, Francesca	University of Arizona
344. Lopez, Lori	University of Wisconsin - Madison
345. López, Gerardo	Michigan State University
346. López, Nancy	University of New Mexico
347. Loya, Karla	University of Hartford
348. Lu, Charles	University of California, San Diego
349. Luedke, Courtney	University of Wisconsin Whitewater
350. Lui, Joyce	San José City College
351. Lum, Belinda	Sacramento City College
352. MacLachlan, Anne	University of California, Berkeley
353. Malone, Mei-Ling	California State University, Fullerton
354. Manning, Kathleen	University of Vermont
355. Manzano, Lester	Loyola University Chicago
356. Maramba, Dina	Claremont Graduate University
357. Marin, Patricia	Michigan State University
358. Marine, Susan	Merrimack College

Name	College/University or Organization
359. Marquez Kiyama, Judy	University of Denver
360. Marsicano, Christopher	Davidson College
361. Martin, Isaac	University of California, San Diego
362. Martinez, Brandon C.	Providence College
363. Martinez, Danny C.	University of California, Davis
364. Martínez, Ramón Antonio	Stanford University
365. Martinez-Ebers, Valerie	University of North Texas
366. Masesquesmay, Gina	California State University, Northridge
367. Masuoka, Natalie	University of California, Los Angeles
368. Matias, Cheryl	University of Denver
369. Matos, Yalidy	Rutgers University
370. Mattheis, Allison	California State University, Los Angeles
371. Mavrogordato, Madeline	Michigan State University
372. Mayer, Anysia	California State University, Stanislaus
373. Mayorga, Edwin	Swarthmore College
374. McCarthy, Martha	Loyola Marymount University
375. McClellan, George	University of Mississippi
376. McClelland, Katherine	Franklin and Marshall College
377. McCloud, Laila	Western Illinois University
378. McCormick, Alexander	Indiana University Bloomington
379. McDermott, Kathryn	University of Massachusetts Amherst
380. McDonough, Patricia M.	University of California, Los Angeles
381. McGuire, Keon	Arizona State University
382. McLaughlin, Conor	Bowling Green State University
383. Mehan, Hugh	University of California, San Diego
384. Melguizo, Tatiana	University of Southern California
385. Merchant, Natasha	University of Washington
386. Merseth, Julie Lee	Northwestern University
387. Mickelson, Roslyn Arlin	University of North Carolina at Charlotte
388. Milem, Jeffrey	University of California, Santa Barbara
389. Milman, Noriko	University of San Francisco
390. Minta, Michael	University of Minnesota
391. Mintz, Beth	University of Vermont
392. Mishra, Sangay	Drew University
393. Mitchell, Jr., Donald	Bellarmino University
394. Mitra, Dana	Pennsylvania State University
395. Mobley, Jr., Steve	University of Alabama
396. Mollet, Amanda	University of Kansas
397. Montaña, Theresa	California State University, Northridge
398. Moolenaar, Elisabeth	Regis University
399. Morales, Amanda	University of Nebraska
400. Morales, Erica	California State Polytechnic University, Pomona
401. Morgan, Demetri	Loyola University Chicago
402. Morgan, Zachary	California Institute of the Arts
403. Morrill, Angie	The Klamath Tribes

Name	College/University or Organization
404. Moses, Michele	University of Colorado Boulder
405. Moses, Yolanda	University of California, Riverside
406. Motha, Suhanthie	University of Washington
407. Muñiz, Raquel	Boston College
408. Muñoz, José	California State University, San Bernardino
409. Muñoz, Susana	Colorado State University
410. Musoba, Glenda	Texas A&M University
411. Myers, Kit	University of California, Merced
412. Nagasawa, Mark	Bank Street College of Education
413. Nakagawa, Kathy	Arizona State University
414. Nakano, Dana	California State University, Stanislaus
415. Nance, Teresa	Villanova University
416. Narui, Mitsu	The Ohio State University
417. Navarro, Rachel	University of North Dakota
418. Nelson, Christine	University of Denver
419. Nelson Laird, Thomas	Indiana University Bloomington
420. Ngo, Federick	University of Nevada, Las Vegas
421. Nguyen, Bach Mai Dolly	Oregon State University
422. Nguyen, David Hoa	Indiana University - Purdue University, Indianapolis
423. Nguyen, Mike Hoa	University of Denver
424. Nguyen, Thai-Huy	Seattle University
425. Nicolazzo, Z	University of Arizona
426. Nienhusser, H. Kenny	University of Connecticut
427. Nieri, Tanya	University of California, Riverside
428. Nieto, Sonia	University of Massachusetts Amherst
429. Nititham, Diane	Murray State University
430. Noblit, George	University of North Carolina at Chapel Hill
431. Noguera, Pedro	University of California, Los Angeles
432. Nyunt, Gudrun	Northern Illinois University
433. O'Neal, Colleen	University of Maryland, College Park
434. Obear, Kathy	University of Massachusetts Amherst
435. Ocampo, Angela	University of Michigan
436. Ocampo, Anthony	California State Polytechnic University, Pomona
437. Oda, Meredith	University of Nevada, Reno
438. Okamoto, Dina	Indiana University Bloomington
439. Okello, Wilson	University of North Carolina Wilmington
440. Oliva, Maricela	University of Texas at San Antonio
441. Olivas, Michael A.	University of Houston
442. Ong, Paul	University of California, Los Angeles
443. Ono, Kent	University of Utah
444. Orey, B. D'Andra	Jackson State University
445. Orfield, Gary	University of California, Los Angeles
446. Orphan, Cecilia	University of Denver
447. Oseguera, Leticia	Pennsylvania State University
448. Osuji, Chinyere	Rutgers University-Camden

Name	College/University or Organization
449. Ott, Molly	Arizona State University
450. Overton, Betty	University of Michigan
451. Ovink, Sarah	Virginia Polytechnic Institute and State University
452. Ozaki, C. Casey	University of North Dakota
453. Padios, Jan	University of Maryland, College Park
454. Paguyo, Christina	University of Denver
455. Paik, Leslie	City College of the City University of New York
456. Park, Jerry	Baylor University
457. Park, Julie	University of Maryland, College Park
458. Park, Lisa	University of California, Santa Barbara
459. Parker, Eugene	University of Kansas
460. Parker, Laurence	University of Utah
461. Parker, Tara L.	University of Massachusetts Boston
462. Parris, Girma	Case Western Reserve University
463. Pasque, Penny	The Ohio State University
464. Patel, Leigh	University of Pittsburgh
465. Patraporn, R. Varisa	California State University, Long Beach
466. Patton Davis, Lori	The Ohio State University
467. Pendakur, Sumun	University of Southern California
468. Perez, Frank G.	University of Texas, El Paso
469. Perez, Patricia	California State University, Fullerton
470. Perez, Rosemary	Iowa State University
471. Perez II, David	Syracuse University
472. Perez-Felkner, Lara	Florida State University
473. Perlstein, Daniel	University of California, Berkeley
474. Perna, Laura	University of Pennsylvania
475. Peterson, Larry	North Dakota State University
476. Pham, Minh-Ha T.	Pratt Institute
477. Pham, Vincent	Willamette University
478. Phan, Ngoc	Hawaii Pacific University
479. Phommasa, Malaphone	University of California, Santa Barbara
480. Pinderhughes, Dianne	University of Notre Dame
481. Pizarro, Marcos	San José State University
482. Pizzolato, Jane	University of Arizona
483. Platt, Spencer	University of South Carolina
484. Poon, OiYan	Colorado State University
485. Pope, Raechele	University at Buffalo
486. Porter, Christa	Kent State University
487. Posselt, Julie	University of Southern California
488. Powers, Jeanne	Arizona State University
489. Price, Melanye	Prairie View A&M University
490. Pyke, Karen	University of California, Riverside
491. Quintanar, Rosalinda	San José State University
492. Ramirez, Hiram	California State University, Channel Islands
493. Ramirez, Leonard	Northeastern Illinois University

Name	College/University or Organization
494. Ramirez, Ricardo	University of Notre Dame
495. Ramos, Delma	University of North Carolina at Greensboro
496. Ray, Chris	North Dakota State University
497. Razfar, Aria	University of Illinois at Chicago
498. Reang Sperry, Chanira	University of Washington
499. Reddick, Richard	University of Texas at Austin
500. Reinerman, Craig	University of California, Santa Cruz
501. Rendon, Laura	University of Texas at San Antonio
502. Renn, Kristen	Michigan State University
503. Reyes, Nicole	University of Hawai'i, Mānoa
504. Reyes, Pedro	University of Texas at Austin
505. Rincón, Blanca	University of Nevada, Las Vegas
506. Rios-Aguilar, Cecilia	University of California, Los Angeles
507. Roberts, Maxine	Independent Scholar
508. Robinson, Sean	Morgan State University
509. Rodriguez, Awilda	University of Michigan
510. Rodriguez, Robyn	University of California, Davis
511. Rodriguez, Noreen	Iowa State University
512. Rodriguez-Kiino, Diane	California Lutheran University
513. Rofel, Lisa	University of California, Santa Cruz
514. Rogoff, Barbara	University of California, Santa Cruz
515. Rowan-Kenyon, Heather	Boston College
516. Rubin, Paul	University of Utah
517. Ruck, Martin D	The Graduate Center, City University of New York
518. Rury, John	University of Kansas
519. Sacramento, Jocyl	California State University, Stanislaus
520. Saenz, Victor	University of Texas at Austin
521. Salazar, Cinthya	University of Maryland, College Park
522. Salinas, Criss	Florida Atlantic University
523. Sallee, Margaret	University at Buffalo
524. Sansone, Vanessa	University of Texas at San Antonio
525. Santa-Ramirez, Stephen	Arizona State University
526. Saran, Rupam	Medgar Evers College, The City University of New York
527. Saw, Anne	DePaul University
528. Schey, Ryan	Auburn University
529. Schneider, Aaron	University of Denver
530. Scott, Jamil	Georgetown University
531. Scott, Janelle	University of California, Berkeley
532. Seaton, Eleanor	Arizona State University
533. Sedlacek, William	University of Maryland, College Park
534. Segal, Marcia Texler	Indiana University Southeast
535. Segoshi, Megan	University of Michigan
536. Segura, Gary	University of California, Los Angeles
537. Seifert, Tricia	Montana State University
538. Sekou, Bilal	University of Hartford

Name	College/University or Organization
539. Self, J. Scott	Abilene Christian University
540. Sengupta-Irving, Tesha	University of California, Berkeley
541. Sewell, Christopher	Williams College
542. Shallish, Lauren	The College of New Jersey
543. Sharma, Nitasha	Northwestern University
544. Sharrow, Elizabeth	University of Massachusetts Amherst
545. Shaw, Vivian	Harvard University
546. Shiao, Jiannbin	University of Oregon
547. Shin, K. Ian	University of Michigan
548. Shin, Richard	University of Maryland, College Park
549. Shomura, Chad	University of Colorado Denver
550. Siegel-Hawley, Genevieve	Virginia Commonwealth University
551. Silver, David	Carnegie Foundation for the Advancement of Teaching
552. Sinclair-Chapman, Valerie	Purdue University
553. Slay, Kelly	University of Maryland
554. Sleeter, Christine	California State University, Monterey Bay
555. Smith, Rogers	University of Pennsylvania
556. Smith, Sandra	University of California, Berkeley
557. Sohoni, Deenesh	College of William and Mary
558. Solorzano, Daniel	University of California, Los Angeles
559. Song, Sarah	University of California, Berkeley
560. Spickard, Paul	University of California, Santa Barbara
561. Sponsler, Laura	University of Denver
562. Squire, Dian	Northern Arizona University
563. Squires, Gregory	The George Washington University
564. Stewart, D-L	Colorado State University
565. Stewart, TJ	Iowa State University
566. Stovall, David	University of Illinois at Chicago
567. Strayhorn, Terrell	Virginia Union University
568. Strolovitch, Dara	Princeton University
569. Strunk, Kamden	Auburn University
570. Stulberg, Lisa	New York University
571. Subervi, Federico	University of Wisconsin - Madison
572. Sun, Jeffrey	University of Louisville
573. Sung, Kenzo	Rowan University
574. Suyemoto, Karen	University of Massachusetts Boston
575. Sze, Julie	University of California, Davis
576. Tachine, Amanda	Arizona State University
577. Takagi, Dana Y.	University of California, Santa Cruz
578. Talusan, Liza	University of Massachusetts Boston
579. Tanaka, Gregory Kazuo	San José City College
580. Tang, Eric	University of Texas at Austin
581. Tate, Katherine	Brown University
582. Taylor, Amanda	American University
583. Taylor, Betty Jeanne	University of Texas at Austin

Name	College/University or Organization
584. Taylor, Kari	Springfield College
585. Terriquez, Veronica	University of California, Santa Cruz
586. Terry, La Mont	Occidental College
587. Thompson Dorsey, Dana	University of Pittsburgh
588. Thornhill, Ted	Florida Gulf Coast University
589. Tieken, Mara	Bates College
590. Tienda, Marta	Princeton University
591. Tierney, William	University of Southern California
592. Tillapaugh, Daniel	California Lutheran University
593. Tomaneng, Rowena	University of San Francisco
594. Torres-Olave, Blanca	Loyola University Chicago
595. Tran, Hoang	Florida Atlantic University
596. Tran, Nellie	San Diego State University
597. Tran Parsons, Uyen	University of North Texas
598. Tran, Van	The Graduate Center, City University of New York
599. Trieu, Monica	Purdue University
600. Trolian, Teniell	University at Albany
601. Truong, Kimberly	MGH Institute of Health Professions
602. Tseng, Vivian	William T. Grant Foundation
603. Tsing, Anna	University of California, Santa Cruz
604. Tucker-Worgs, Tamelyn	Hood College
605. Turner, Caroline	California State University, Sacramento
606. Umemoto, Karen	University of California, Los Angeles
607. Uy, Phitsamay	University of Massachusetts Lowell
608. Valadez, Concepcion	University of California, Los Angeles
609. Valdez, Zulema	University of California, Merced
610. Valencia, Richard R.	University of Texas at Austin
611. Valverde, Caroline Kieu-Linh	University of California, Davis
612. Vargas, Edward	Arizona State University
613. Varghese, Manka	University of Washington
614. Vasquez, John	Van Andel Institute
615. Vasquez, Marissa	San Diego State University
616. Vaughn, Kehaulani	University of Utah
617. Vega, Desireé	University of Arizona
618. Velasco, Richard	Texas Tech University
619. Venzant Chambers, Terah	Michigan State University
620. Verney, Steven	University of New Mexico
621. Villanueva, George	Loyola University Chicago
622. Vue, Rican	University of California, Riverside
623. Wallace, Sophia Jordán	University of Washington
624. Wang, Leslie	University of Massachusetts Boston
625. Wang, Oliver	California State University, Long Beach
626. Wang, Wenjie	New Mexico State University
627. Ward, LaWanda	Pennsylvania State University
628. Warren, Mark	University of Massachusetts Boston

Name	College/University or Organization
629. Watanabe, Paul	University of Massachusetts Boston
630. Waters, Mary	Harvard University
631. Weaver-Hightower, Marcus	University of North Dakota
632. Weidman, John	University of Pittsburgh
633. Weisberg, Herbert	The Ohio State University
634. Wellman, David	University of California, Santa Cruz
635. Welner, Kevin	University of Colorado Boulder
636. White-Lewis, Damani	University of Maryland, College Park
637. Williams, Brittany	St. Cloud State University
638. Williams, Joanna	University of Virginia
639. Williams, Leslie	University of Hartford
640. Williams, Peter	Abilene Christian University
641. Williams, Terry	Loyola University Chicago
642. Williams León, Teresa	California State University, Northridge
643. Wilson, Camille	University of Michigan
644. Wilson, David	University of Delaware
645. Winkle-Wagner, Rachelle	University of Wisconsin - Madison
646. Wong, Diane	New York University
647. Wong, Janelle	University of Maryland, College Park
648. Worthington, Roger	University of Maryland, College Park
649. Wotipka, Christine Min	Stanford University
650. Wright, Dwayne Kwaysee	The George Washington University
651. Wright, Erin	University of Hawai'i, Mānoa
652. Wu, Ellen	Indiana University Bloomington
653. Wu, Tommy	McMaster University
654. Wun, Connie	AAPI Women Lead
655. Xiong, Yang Sao	University of Wisconsin - Madison
656. Yamamura, Erica	Seattle University
657. Yamashiro, Jane	Mills College
658. Yano, Christine	University of Hawai'i, Mānoa
659. Yao, Christina	University of South Carolina
660. Yee, Barbara W.K.	University of Hawai'i, Mānoa
661. Yee, Joliana	Yale University
662. Yellow Horse, Aggie	Arizona State University
663. Yep, Kathleen	Pitzer College
664. Yeung, Fanny	California State University, East Bay
665. Yi, Varaxy	California State University, Fresno
666. Yoo, David	University of California, Los Angeles
667. York, Travis	Association of Public & Land-Grant Universities
668. Yoshikawa, Hirokazu	New York University
669. Young, Ryan	University of Illinois at Urbana-Champaign
670. Yu, Judy	Queens College, City University of New York
671. Yun, John	Michigan State University
672. Zamani-Gallaher, Eboni	University of Illinois at Urbana-Champaign
673. Zarate, Estela	California State University, Fullerton

Name	College/University or Organization
674. Zatz, Marjorie	University of California, Merced
675. Zentella, Ana	University of California, San Diego
676. Zerquera, Desiree	University of San Francisco
677. Zhou, Min	University of California, Los Angeles
678. Zweigenhaft, Richard	Guilford College