**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC., Plaintiff, v. PRESIDENT AND FELLOWS OF HARVARD COLLEGE, Defendant.	Civil Action No. 1:14-cv-14176-ADB

AMICUS CURIAE **BRIEF OF 531 SOCIAL SCIENTISTS AND SCHOLARS
ON COLLEGE ACCESS, ASIAN AMERICAN STUDIES, AND RACE
IN SUPPORT OF DEFENDANT**

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INTEREST OF *AMICI CURIAE*

Amici curiae are 531 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] Collectively, *amici* represent researchers and scholars employed at 240 different institutions and organizations, including more than 220 colleges and universities across the United States. Their work extends across numerous fields and disciplines—education, sociology, anthropology, psychology, public policy, political science, and history—with at least one third having substantial expertise on the Asian American population. Numerous *amici* have been recognized with the highest national honors and awards in their field. Eleven *amici* are members of the National Academy of Education, and 15 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 considers as it designs and implements its whole-person review process. The brief draws upon *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 arguments in this case. Those arguments promote an excessive focus on numerical measures of academic success that research has shown to be unreliable as isolated measures of merit and that rely on the myth of an Asian penalty and on problematic stereotypes of Asian Americans. The research

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[1] A 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.

discussed, coupled with a review of the facts of this case, lead *amici* to conclude that Plaintiff's motion for summary judgement should be denied.

INTRODUCTION

High achieving Asian American applicants benefit from Harvard's individualized whole-person review because it treats each applicant as an individual and inhibits the influence of racial biases and assumptions. Plaintiff's arguments to the contrary are largely premised on racial stereotypes of Asian Americans as a monolithic group with uniformly high test scores and high school GPAs—and on related negative stereotypes about African American and Latino students' academic abilities. Asian Americans comprise an incredibly diverse population, with a variety of national origins, economic circumstances, and educational opportunities. But, ironically, Plaintiff treats Asian Americans as a homogenous population, never pausing to acknowledge the immense diversity within that group. Harvard, in contrast, treats each Asian American applicant (like applicants of every other race) as an individual person whose achievements along multiple axes reflect the individual's personal context and life experience.

At bottom, Plaintiff fails to produce any evidence of discrimination on the basis of race against Asian American applicants. Plaintiff's argument depends on its view that, among the many thousands of academically qualified applicants, Harvard should admit only students with the highest quantifiable measures of achievement, measured by a limited and deficient set of criteria—and that any deviation from that course necessarily reflects racial bias. But it is up to Harvard, not Plaintiff, to decide what qualities it values among its many academically qualified applicants. And nothing in Plaintiff's proffered evidence suggests that Harvard is intentionally discriminating on the basis of race when it chooses to consider all aspects of an applicant's achievements and potential to contribute, rather than focusing on the narrow range of limited criteria Plaintiff prefers.

Indeed, research-based evidence demonstrates that the criteria Plaintiff would have this Court require Harvard to rely on are themselves infected with biases and stereotypes.

Because Asian American applicants, like applicants of all races, benefit from Harvard's whole-person review process, Plaintiff's motion for summary judgment should be denied.

ARGUMENT

It is by now beyond doubt that an institution of higher education such as Harvard has a compelling interest in enrolling a diverse student body. *Fisher v. Univ. of Tex. at Austin*, 136 S. Ct. 2198, 2210 (2016); *Grutter v. Bollinger*, 539 U.S. 306, 328 (2003). It is also beyond doubt that an institution seeking to enroll a diverse student body may consider race as one factor among many when assessing who among the universe of academically qualified students will best contribute to the institution's overall educational goals. *Fisher*, 136 S. Ct. at 2205; *Grutter*, 539 U.S. at 334-340. In evaluating the constitutionality of state schools' consideration of race as a factor in admissions, the Supreme Court has repeatedly emphasized "the importance of considering each particular applicant as an individual, assessing all of the qualities that individual possesses, and in turn, evaluating that individual's ability to contribute to the unique setting of higher education." *Gratz v. Bollinger*, 539 U.S. 244, 271 (2003). Harvard's whole-person approach to undergraduate admissions does just that—it considers "each characteristic of a particular applicant . . . in assessing the applicant's entire application." *Ibid.* Critically, qualified applicants of *all* races benefit from Harvard's whole-person approach—because *every* applicant is assessed on his or her own merits, understood with reference to his or her life experience—and *all* students admitted to Harvard benefit from being part of a community that is diverse across multiple dimensions.

I. **Asian American Applicants Benefit from Harvard's Whole-Person Review Process.**

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. In choosing among that vast pool of well-qualified applicants, Harvard considers "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. Plaintiff's arguments to the contrary are based on false premises and stereotypes. Plaintiff's arguments have no basis in social-science research—and in many respects contradict such research.

A. **Asian Americans Comprise an Extremely Diverse Population.**

Unlike Harvard, Plaintiff fails to treat Asian American applicants as individuals. Plaintiff ignores the incredible range of diversity among Asian American applicants, instead treating them as a homogenous group that excels and contributes in only a narrow range of human activity. In reality, the individuals covered by Plaintiff's category of "Asian Americans" represent a broad array of national origins, ethnicities, cultural heritages, economic and educational circumstances and opportunities, and American experiences. In short, they are individuals, each with his or her own story—and that is exactly how Harvard treats them.

As one 2011 study 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: 2011*, at 2. Asian Americans have been among the "nation's

fastest growing racial groups since discriminatory immigration quotas were eliminated in 1965 and now make up 6% of the country's total population." *Ibid.*

Asian Americans are also "the most economically divided racial or ethnic group in the U.S.," displaying the most extreme 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 broad degree of disparities 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 India, who display relatively high rates of college entry and completion. *Ibid.*

Due in part to disparities in educational opportunities among Asian American K-12 students, moreover, 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 a relatively large proportion of Asian American adults with Southeast-Asian ethnicities (between 51 and 65%) have not attended college, while the same is true for a much smaller percentage (between 20 and 34%) of Asian Americans with South- 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%) attend community colleges, contrary to the common racial stereotype suggesting that Asian Americans primarily attend elite private colleges. *Id.* at 9.

Plaintiff thus errs in treating Asian American applicants to Harvard as a homogeneous block. The purpose of employing a whole-person review process like the one Harvard uses is to account for the diverse range of 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 treats as a unit. 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 in so doing, Harvard can more accurately assess the contributions each applicant would likely make to the undergraduate population and experience.

Significantly, not all qualified Asian American applicants fit the stereotype of perfect test scores, perfect high school GPAs, and assumed cognitive and cultural advantages. And the many qualified Asian American applicants who fall outside that stereotype but nevertheless have the potential to make enormous contributions to the campus community benefit greatly from holistic review processes like Harvard's. As with the applicant pool more generally, quantifiable measures alone do not offer full, reliable, or valid measures of the diversity of achievements among the myriad talented applicants to Harvard and other selective colleges and universities.

B. Harvard's Whole-Person Review in Admissions Takes Account of the Diverse Experiences and Qualities of Asian American Applicants.

Harvard's review process seeks to assemble a body of students who will learn from and

challenge each other, creating a diverse environment in which "to educate the citizens and citizen-leaders for our society." Harvard College, Mission, Vision, and History, https://college.harvard.edu/about/mission-and-vision (last visited Aug. 30, 2018). 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 identities," to "deepen[]" "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 traditional 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. Doc. 420, Defendant's Statement of Material Facts (Def. SMF) ¶¶ 22, 49; Doc. 419-33, Report of David Card, Ph.D. (Card Report) ¶¶ 53-54. Because academic potential is *not* the only metric Harvard values, the admissions process also considers an applicant's personal 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. Although consideration of race is certainly an element of Harvard's whole-person review, the "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.

Critically, Harvard's whole-person review process takes into account diversity in individual applicants' contexts of achievement, values a diverse range of interests and accomplishments,

and considers how each applicant might contribute to the university's educational environment. The process uses four categories of ratings—academic, athletic, extracurricular, and personal—in addition to an overall rating that summarizes the strengths of the applicant and takes into account all information about how an applicant may contribute to the campus educational environment, including considering the applicant's race as one factor among many. Def. SMF ¶¶ 64, 118-125. That process benefits Asian American applicants by allowing for consideration of the array of contexts from which each applicant—and his or her achievement credentials—emerged. Educational researchers have explained that a whole-person review process such as Harvard's fosters a greater understanding of each applicant by using a broad range of factors, including academic performance, personal traits, and school, community, and family contexts, to recognize a wide array of talents and qualities in all students, including Asian Americans.

Research demonstrates that this approach to admissions, also known as whole-context review, transcends "individual characteristics to consider 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.* Because the analysis of

Plaintiff's expert Professor Arcidiacono fails to take account of the full range of comprehensive applicant data that Harvard considers, it does not accurately reflect or model the actual process of holistic review at Harvard.

Data demonstrate, moreover, that Harvard's whole-person review process benefits Asian American applicants. Among 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%). Def. SMF ¶ 229; Doc. 414-2, Plaintiff's SMF ¶ 638. And the proportion of Asian Americans in each admitted class at Harvard has increased by 29% in the last decade. Def. SMF ¶ 113. Those statistics confirm research finding that considering race as one of many factors (rather than as a determinative factor) in admission through a holistic review process like Harvard's can increase rates of admission among Asian American applicants and other students of color. For example, a recent study demonstrated that holistic review practices that account for individual applicants' educational and life contexts (including race) 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 (Oct. 9, 2017), http://www-personal.umich.edu/~bastedo/papers/ASHE2017.paper.pdf.

C.   As a Group, Asian Americans Support Race-Conscious Admissions Policies.

As explained, Plaintiff's argument fails to account for the diversity of experiences in the Asian American population, instead treating Asian Americans as a bloc that excels along a particular axis of success. But Plaintiff's approach is also 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

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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 who can potentially

contribute to a campus community in unlimited ways.

Social-science data—spanning different samples during different periods of time—con-

firms 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 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 among Asian Americans

to race-blind admissions practices: 61% of Asian American voters in California opposed a 1996

ballot measure that prohibited the consideration of race in public college admissions, and 75% of

Asian American voters in Michigan opposed a similar 2006 ballot initiative in that State. *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). In fact, 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,*

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Affirmative Action, and the Political Economy of Racism: A Multidimensional Model of Racial Ideologies 23 (Nov. 2017), https://www.oiyanpoon.com/projects.

Thus, Plaintiff's narrative in this case does not reflect concerns actually held by Asian Americans as a community. That is no surprise given the benefits individual members of that community derive from race-conscious, whole-person admissions practices like Harvard's.

II.   Research Shows That Plaintiff's Excessive Focus on Numerical Measures of Academic Success Is Unwarranted and Unwise.

The Supreme Court has long recognized that colleges and universities may consider all manner of "qualities" that are "likely to promote beneficial educational pluralism," "includ[ing] exceptional personal talents, unique work or service experience, leadership potential, maturity, demonstrated compassion, a history of overcoming disadvantage, ability to communicate with the poor, or other qualifications deemed important." *Regents of the Univ. of Calif. v. Bakke*, 438 U.S. 265, 317 (1978) (opinion of Powell, J.). More recently, the Court explained that one measure of academic success (there, class rank), "like any single metric, . . . will capture certain types of people and miss others." *Fisher*, 136 S. Ct. at 2213. The Court went on to explain that "privileging one characteristic above all others does not lead to a diverse student body. Indeed, to compel universities to admit students based on [one academic metric] alone is in deep tension with the goal of educational diversity as this Court's cases have defined it." *Ibid.* But that is exactly what Plaintiff asks for—to compel Harvard to admit students based only on the narrow range of factors that Plaintiff values.

A large body of research shows that 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*

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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.

Particularly relevant to this case, Asian Americans on average exhibit the highest group levels for

both educational access 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 commu-

nity, but on average, those features help, rather than hurt, Asian American students.[2] No one ar-

gues that Harvard should admit students based primarily on family resources, but that would, to a

large degree, be the practical effect of Plaintiff's preferred approach to admissions. Significantly,

such an approach would harm lower-income applicants of all races, including Asian Americans.

Perhaps acknowledging the flaws of tests like the SAT and ACT, more than 1,000 accred-

ited institutions of higher education (most recently the University of Chicago) have announced

that they do not require standardized tests as part of their admissions practices.[3] That trend recog-

nizes the limitations of such tests as measures of academic quality among prospective students.

Of course, test scores and high school grades were not designed to predict—and cannot

predict—what contributions an applicant is likely to make to a university's broader educational

goals of fostering a healthy social environment for developing good citizens and citizen-leaders

with strong critical-thinking and leadership skills. *See generally* Amicus Br. of Am. Educ. Re-

search Ass'n et al., *Fisher*, *supra* (Oct. 30, 2015), 2015 WL 6668475 (collecting and discussing

research sources). To assess those intangible (but vital) dimensions of each applicant—and in part

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[2] Data from the College Board itself shows that in 2017, students whose parents held a graduate degree achieved an average score of 1177 (out of a total of 1600 points), compared to an average score of just over 1000 for those whose parents had graduated from high school only. College Board, *supra*, at 3. In 2016, the average composite score on the ACT was 4 points higher (out of a total of 36 points) among those students whose family income was $80,000 or higher compared to those whose family income was less than $80,000—a disparity that increased from 2012 to 2016. Mattern et al., *supra*.

[3] FairTest, More Than 1000 Accredited Colleges and Universities That Do Not Use ACT/SAT Scores to Admit Substantial Numbers of Students into Bachelor-Degree Programs, https://www.fairtest.org/university/optional (last visited Aug. 30, 2018).

to correct for the biases associated with standardized tests—colleges and universities have always

relied on essays and other non-quantitative measures as part of the admissions process. Their right

to do so is supported by research and 40 years of Supreme Court precedent (from *Bakke* in 1978

to *Fisher* in 2016), and it makes good sense given the biases associated with standardized tests.

III.   Plaintiff Fails to Provide Any Evidence of Discrimination Against Asian Americans, Relying Instead on Myths of an "Asian Penalty," the "Model Minority" Stereotype, and Misleading Reports of "Personality" Ratings.

Plaintiff contends that Harvard's 40-member admissions committee (*see* Def. SMF ¶ 76)

engages in systemic intentional discrimination on the basis of race against Asian American appli-

cants. Lacking a smoking gun confirming such a massive illegal conspiracy, Plaintiff relies on its

expert's statistical analysis of a subsection of applicants to Harvard—and purports to find that

Asian American applicants score higher on supposedly objective criteria such as academic and

extracurricular ratings, while scoring lower on non-quantitative criteria such as personal and over-

all ratings. The only logical conclusion, Plaintiff asserts, is that Harvard is intentionally excluding

Asian American applicants *because they are Asian American*. Plaintiff is wrong at every step.

Fundamentally, Plaintiff's case is built on its assumption that the greater an applicant's

past academic success (measured in a very limited manner), the greater his or her chances of ad-

mission to Harvard should be. But that argument is premised on the assumption that *Plaintiff's*

view of which personal qualities Harvard should value in the admissions process should prevail

over *Harvard's* view—and, consequently, that Plaintiff's view of what type of student body be-

longs at Harvard should prevail over Harvard's own judgment. If it wanted to, Harvard could

admit a class comprised only of students with perfect high school GPAs, or only of students with

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. Har-

vard 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.

A.   The Myth of an Asian Penalty

Plaintiff's claims of discrimination rest on the false assertion that Asian American applicants are systematically penalized in the admissions process. As Harvard's expert points out, that contention is flatly contradicted by the facts: in three of the six years at issue in this case, Asian American ethnicity was associated with a slightly *higher* likelihood of admission to Harvard than white ethnicity was, controlling for other factors. Doc. 419-37, Rebuttal Report of David Card, Ph.D. ¶ 103 & Ex. 12. And even among the subset of applicants Plaintiff focuses on (*i.e.*, non-ALDC applicants), Asian Americans had a higher rate of admission than white applicants in four of the six years at issue and when all six years are considered in the aggregate. Card Report ¶¶ 70-71 & Ex. 7. Indeed, Plaintiff's allegation of intentional discrimination against Asian Americans—when Asian Americans comprise 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, https://www.census.gov/quickfacts/fact/table/US/PST045217 (2017); Harvard College, Admissions Statistics, https://college.harvard.edu/admissions/admissions-statistics (last visited Aug. 30, 2018).

With the facts against it, Plaintiff supports its "Asian penalty" narrative by relying on flawed statistics, false assumptions, and racial stereotypes. Plaintiff primarily argues that Harvard's admissions process should rely more heavily on quantitative measures of academic performance—but does not even attempt to demonstrate (nor could it) that such measures alone would provide a reliable or complete indication of future academic success, let alone that such measures correlate with other qualities that Harvard values in its student body. Plaintiff cannot show that Harvard admits academically unqualified applicants of any race. So the question is, among the

many thousands of qualified applicants, which students should be admitted. Plaintiff's contention that Harvard intentionally discriminates based on race by valuing some non-quantitative measures of success when choosing among academically qualified applicants does not hold water. Plaintiff fails to establish that Asian American applicants are disadvantaged by Harvard's whole-person review process, let alone that any disadvantage is the result of intentional race discrimination by the 40-person admissions committee.

B.   Plaintiff's Contention That Academic Metrics Should Matter Most in Choosing Among Academically Qualified Applicants Relies on and Reinforces Racial Stereotypes.

Plaintiff argues that, by choosing not to privilege numerical measures of past academic success over all other criteria when choosing among applicants who all agree are academically qualified to attend Harvard, the 40-person admissions committee intentionally discriminates on the basis of race against Asian Americans. In addition to lacking evidentiary and social-science support, that contention is flawed because it relies on racial stereotypes about Asian Americans and reinforces negative stereotypes about other racial minorities.

Underlying Plaintiff's argument is what social scientists call the "Model Minority Stereo-type" (or "Model Minority Myth"), which juxtaposes two racial stereotypes: first, that Asian Americans are smarter and value education more than other groups, and second, 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); Samuel D. Museus & Peter N. Kiang, *Deconstructing the Model Minority Myth and How It Contributes to the Invisible Minority Reality in Higher Education Research*, New Directions for Institutional Research, Summer 2009, at 5, 6-13; Stacey J. Lee, *Behind the Model-Minority Stereotype: Voices of High- and Low-Achieving*

Asian American Students, 25 Anthropology & Educ. Q. 413, 413-414 (1994). The stereotype of Asian Americans as a "model" minority in the context of education has no place in admissions decisions, however, because it (like any racial stereotype) ignores the context of each person's educational experience and ignores differences within the broader Asian American population.

Decades of scholarship in Asian American Studies helps to illuminate the political and structural origins of the educational achievement advantage demonstrated by specific ethnic groups of Asian Americans in the United States today. *See*, *e.g.*, Robert T. Teranishi et al., *The College-Choice Process for Asian Pacific Americans: Ethnicity and SocioEconomic Class in Context*, 27 Rev. Higher Educ. 527, 545-547 (2004). That research reveals that Asian Americans' educational success is attributable to context, rather than to some innate ability or inherent cultural attitude—just as with every other racial group. *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). The origins of the Model Minority stereotype extend even prior to the 1965 Immigration and Nationality Act, 8 U.S.C. § 1101 *et seq.*, 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. After 1965, the United States started to recruit highly 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 even further 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 allo-

cated to immigrants from Asia. U.S. Citizen & Immigration Servs., *Characteristics of H1B Spe-*

cialty Occupation Workers: Fiscal Year 2012 Annual Report to Congress, October 1, 2011-Sep-

tember 30, 2012, at 6 (2013). And the majority of 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 stereo-

type 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. Sociologist Jennifer Lee reports that 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, while 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 Nagara-

jan, *Only 10% of Students Have Access to Higher Education in Country*, Times of India (Jan. 5,

2014); *The Rise of Asian Americans*, *supra*, at 25. The high degree of educational achievement of

Asian Americans traces more directly to U.S. immigration policies and other contextual factors,

not inherent qualities tied to race. And Asian Americans who trace their U.S. origins to paths that

do not involve recruitment of highly skilled individuals may well experience the U.S. education

system in a wholly different context. As with any other racial group, Asian Americans' access to

educational success and opportunity is uniquely shaped by context. Harvard's whole-person re-view takes into account variations in experience within that (and every) population.

Importantly, by relying on positive stereotypes of Asian Americans' educational abilities and values, Plaintiff subtly leverages negative stereotypes about African American and Latino students' experience with education. By assuming that higher average standardized test scores and grades among Asian Americans are the result of unique individual effort, Plaintiff implies that any lower average scores for other racial minorities are due to lack of individual effort. This strategy capitalizes on documented racial stereotypes. In fact, although research shows that a larger percentage of Latino 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 study of white students attending elite colleges who took part in the National Longitudinal Study of Freshman showed they were more likely to view Asian Americans as "hard working," "intelligent," and more willing to "persevere[]" than African American and Latino students—and were more likely to attribute African American and Latino 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).

The bottom line is that racial stereotypes—whether positive or negative—often have no basis in reality and *never* take account of the diverse experiences of individuals within any racial group. Harvard's whole-person review, in contrast, "focuse[s] on each applicant as an individual, and not simply as a member of a particular racial group." *Parents Involved*, 551 U.S. at 722.

C.   **Plaintiff Mischaracterizes the Role That Harvard's Personal Rating Plays in Whole-Person Review.**

Plaintiff relies on misleading characterizations of Harvard's personal rating as a tool for enabling discrimination—rather than for giving credit to academically qualified students for qualities that are vital in determining success at Harvard and later in life, such as personal commitment to the community and potential for future growth. 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, at A1 (June 16, 2018), it is not an assessment of how sparkling or drab an applicant's personality is. Far from it.

When assigning a personal rating, admissions officers do not take race into account. Def. SMF ¶¶ 61, 118. But Plaintiff relies on an observed negative statistical correlation between Asian American ethnicity and personal rating, arguing that the only possible explanation for that correlation is intentional discrimination by Harvard's 40-member admissions committee. Plaintiff's conclusion has no basis in logic, to say nothing of social science research or data. There is no reason to expect that applications from a group with the highest average academic ratings would also receive the highest average ratings in every other category. Very few of the more than 40,000 applicants to Harvard are exceptional in every area—and no racial group receives the highest ratings in every category.

Research shows distinct differences in college application patterns among different racial groups. Asian American students are more likely than students of other racial and ethnic groups to apply to highly selective universities. *See* Brian P. An, *The Relations Between Race, Family Characteristics, and Where Students Apply to College*, 39 Soc. Sci. Res. 310, 317 (2010). Asian American students, particularly those from high- and middle-income families, are also more likely to apply to more colleges than the national average. *See* Mitchell J. Chang et al., *Beyond Myths:*

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The Growth and Diversity of Asian American College Freshman, 1971-2005, at 16 (2007). Research suggests that Asian American applicants 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, and that desire for institutional prestige may underlie the choice to apply to elite universities. *See* Kaidi Wu et al., *Frogs, Ponds, and Culture: Variations in Entry Decisions*, 9 Soc. Psychol. & Personality Sci. 99, 101 (2018). This research on application patterns by race suggests that Asian Americans may be more likely than other students to fill out an application to Harvard when 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* (forthcoming Oct. 2018) (manuscript at ch. 4, p. 22) (on file with author).

Moreover, 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. Within the large group of academically qualified applicants, Harvard is entitled to ask 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. Harvard's whole-person review considers each applicant as an individual, not merely as a member of a group. Thus, an Asian American applicant who, *e.g.*, shows promise in an unconventional field or hails from an unconventional place may well receive a higher personal rating than an otherwise similarly situated applicant. Harvard's approach eschews assumptions based on statistical norms, instead valuing each applicant as a whole person.

CONCLUSION

Plaintiff's motion for summary judgment should be denied.

Dated: August 30, 2018   Respectfully submitted,

/s/ Richard J. Rosensweig   /s/ Sarah E. Harrington
Richard J. Rosensweig (BBO #639457)   Sarah E. Harrington (*pro hac vice*)
GOULSTON & STORRS PC   GOLDSTEIN & RUSSELL, P.C.
400 Atlantic Avenue   7475 Wisconsin Avenue, Suite 850
Boston, Massachusetts 02110   Bethesda, MD 20814
(617) 574-3588   (202) 362-0636
rrosensweig@goulstonstorrs.com   sharrington@goldsteinrussell.com

Counsel for Amici Curiae 531 Social Scientists and Scholars
on College Access, Asian American Studies, and Race

CERTIFICATE OF SERVICE

I hereby certify that this document filed on August 30, 2018, through the Court's ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Richard J. Rosensweig

Appendix: List of *Amici Curiae*

1.	Abajian, Suzie	Orange County Department of Education
2.	Abes, Elisa	Miami University
3.	Abrajano, Marisa	University of California, San Diego
4.	Acevedo-Gil, Nancy	California State University, San Bernardino
5.	Adamian, Annie	California State University, Chico
6.	Agius Vallejo, Jody	University of Southern California
7.	Agozino, Onwubiko	Virginia Polytechnic Institute and State University
8.	Aguilar-Hernández, José M.	California State Polytechnic University, Pomona
9.	Ali, Arshad	George Washington University
10.	Alvarez, Cynthia L.	University of California, Los Angeles
11.	Amechi, Mauriell	University of Redlands
12.	Ampaw, Frimpomaa	Central Michigan University
13.	Ananth, Akhila	California State University, Los Angeles
14.	Anderson, Lauren	Connecticut College
15.	Annamma, Subini	University of Kansas
16.	Antonio, Anthony	Stanford University
17.	Antrop-Gonzalez, Rene	Metropolitan State University
18.	Aptekar, Sofya	University of Massachusetts Boston
19.	Aquino Sosa, Gloria	Saint Mary's College of California
20.	Arao, Brian	University of California, Santa Cruz
21.	Ardoin, Sonja	Appalachian State University
22.	Arellano, Lucy	Oregon State University
23.	Asato, Jolynn	San Jose State University
24.	Assalone, Amanda	Southern Education Foundation
25.	Au, Kathryn H.	University of Hawaiʻi, Mānoa
26.	Austin, Algernon	Demos
27.	Austin, Ann	Michigan State University
28.	Baber, Lorenzo	Iowa State University
29.	Bahena, Sofia	University of Texas at San Antonio
30.	Ballysingh, Tracy	University of Vermont
31.	Barnhardt, Cassie	University of Iowa
32.	Barone, Ryan	Colorado State University
33.	Basile, Vincent	Colorado State University
34.	Bastedo, Michael	University of Michigan
35.	Beatty, Cameron	Florida State University
36.	Bengochea, Alain	University of Nevada, Las Vegas
37.	Bensimon, Estela	University of Southern California
38.	Berger, Joseph	University of Massachusetts Boston
39.	Berliner, David	Arizona State University

40. Bernal, Jesse   Grand Valley State University
41. Bernardo, Joseph   Loyola Marymount University
42. Berrey, Ellen   University of Toronto
43. Berriz, Berta   Lesley University
44. Blockett, Reginald   Grand Valley State University
45. Bloom-Leiva, Gilda   San Francisco State University
46. Bondi, Stephanie   University of Nebraska
47. Borja, Melissa   University of Michigan
48. Boylan, Hunter   Appalachian State University
49. Brazelton, Grady   Northern Arizona University
50. Bukoski, Beth   University of Texas at Austin
51. Burciaga, Rebeca   San Jose State University
52. Byrd, Ajani   Mission College
53. Byrd, W. Carson   University of Louisville
54. Cabrera, Nolan   University of Arizona
55. Cain, Ebony   Pepperdine University
56. Calderon, Dolores   Western Washington University
57. Calderone, Shannon   Washington State University
58. Callahan, Rebecca   University of Texas at Austin
59. Camacho, Keith   University of California, Los Angeles
60. Camangian, Patrick   University of San Francisco
61. Cantor, Nancy   Rutgers University-Newark
62. Cantwell, Brendan   Michigan State University
63. Castillo-Montoya, Milagros   University of Connecticut
64. Castro Samayoa, Andrés   Boston College
65. Castro, Erin   University of Utah
66. Catalano, D. Chae   Western Illinois University
67. Chan, Jason   Independent Scholar
68. Chang, Benji   Education University of Hong Kong
69. Chao Romero, Robert   University of California, Los Angeles
70. Cheah, Charissa   University of Maryland, Baltimore County
71. Chen, Angela   Pre-Health Dreamers
72. Chen, Carolyn   University of California, Berkeley
73. Chen, Jondou   University of Washington
74. Chen, Stephanie   Wright Institute
75. Cheng, Jih-Fei   Scripps College
76. Cheung, Christabel   University of Hawaiʻi, Mānoa
77. Chiang, Warren   Stanford University
78. Chikkatur, Anita   Carleton College
79. Chin, Christina   California State University, Fullerton
80. Chin, Jean Lau   Adelphi University

81.	Ching, Cheryl	University of Massachusetts Boston
82.	Chow, Candace	University of Utah
83.	Chung, Angie	University at Albany
84.	Cintron-Vélez, Aixa	Russell Sage Foundation
85.	Clark, Christine	University of Nevada, Las Vegas
86.	Cohen, Sarah	Loyola University Chicago
87.	Cokley, Kevin	University of Texas at Austin
88.	Collins, Christopher	Azusa Pacific University
89.	Conchas, Gilberto	University of California, Irvine
90.	Cooper Stein, Kristy	Michigan State University
91.	Covarrubias, Alejandro	University of San Francisco
92.	Crisp, Gloria	Oregon State University
93.	Cruz, Cindy	University of California, Santa Cruz
94.	Cuellar, Marcela	University of California, Davis
95.	Dache-Gerbino, Amalia	University of Missouri
96.	Dancy, T. Elon	University of Pittsburgh
97.	Danico, Mary	California State Polytechnic University, Pomona
98.	Dao, Loan	University of Massachusetts Boston
99.	Darling-Hammond, Linda	Stanford University
100.	DasGupta, Debanuj	University of Connecticut
101.	Davis III, Charles H.F.	University of Southern California
102.	Davis, Tracy	Western Illinois University
103.	DeAngelo, Linda	University of Pittsburgh
104.	Deckman, Sherry	Lehman College, City University of New York
105.	DeGuia, Vanessa	Teach For America
106.	DeGuzman, Glenn	University of California, Berkeley
107.	deGuzman, Jean-Paul	University of California, Los Angeles
108.	Denson, Nida	Western Sydney University
109.	Deo, Meera	University of California, Davis
110.	Desai, Shruti	McKendree University
111.	Dhingra, Pawan	Amherst College
112.	Dineen-Wimberly, Ingrid	University of La Verne
113.	Dotts, Brian	University of Georgia
114.	Dowd, Alicia	Pennsylvania State University
115.	Drezner, Noah	Columbia University
116.	Duran, Richard P	University of California, Santa Barbara
117.	Dwyer, Brighid	Villanova University
118.	Dymski, Gary	University of Leeds
119.	Eagan, Kevin	University of California, Los Angeles
120.	Eaton, Susan	Brandeis University
121.	Eaton, Paul	Sam Houston State University

122.	Edejer, Eilene	Loyola University Chicago
123.	Edwards Williams, Kirsten	University of Oklahoma
124.	Edwards, Korie	Ohio State University
125.	Embrick, David	University of Connecticut
126.	Endo, Rachel	University of Washington Tacoma
127.	Engberg, Mark	University of Denver
128.	Espino, Michelle	University of Maryland, College Park
129.	Fabionar, James	University of San Diego
130.	Felder, Pamela	Black Doctorates Matter
131.	Fernandes, Leela	University of Michigan
132.	Fernandez, Frank	University of Houston
133.	Fine, Michelle	The Graduate Center, City University of New York
134.	Finnegan, Dorothy E.	College of William and Mary
135.	Fiske, Susan	Princeton University
136.	Flores, Stella	New York University
137.	Fox, Heather	University of Illinois at Urbana-Champaign
138.	Francisco-Menchavez, Valerie	San Francisco State University
139.	Frankenberg, Erica	Pennsylvania State University
140.	Frasure-Yokley, Lorrie	University of California, Los Angeles
141.	Fried, Jane	Central Connecticut State University
142.	Fries-Britt, Sharon	University of Maryland, College Park
143.	Fujimoto, Eugene	California State University, Fullerton
144.	Fultz, Michael	University of Wisconsin - Madison
145.	Furr, Sara	University of Chicago
146.	Gándara, Patricia	University of California, Los Angeles
147.	Garces, Liliana M.	University of Texas at Austin
148.	Garcia Bedolla, Lisa	University of California, Berkeley
149.	Garcia, Crystal	Auburn University
150.	Garcia, Jennifer	Loyola Marymount University
151.	Garibay, Juan	University of Virginia
152.	Gasman, Marybeth	University of Pennsylvania
153.	Gee, Gilbert	University of California, Los Angeles
154.	George Mwangi, Chrystal	University of Massachusetts Amherst
155.	George, Casey	University of Louisville
156.	Geron, Kim	California State University, East Bay
157.	Giani, Matthew	University of Texas at Austin
158.	Gilbert, Aliza	Highland Park High School
159.	Gilkerson, Tammeil	Laney College
160.	Gin, Kevin	Holy Names University
161.	Gina, Garcia	University of Pittsburgh

162.	Ginsberg, Ricki	Colorado State University
163.	Gonzales, Leslie	Michigan State University
164.	Goodman, Kathleen	Miami University
165.	Gordon da Cruz, Cynthia	Chabot College
166.	Goyette, Kimberly	Temple University
167.	Grande, Sandy	Connecticut College
168.	Graves, Joseph	Joint School of Nanosciences & Nanoengineering, North Carolina AT&T State University & The University of North Carolina at Greensboro
169.	Griffin, Kimberly	University of Maryland, College Park
170.	Guido, Florence	University of Northern Colorado
171.	Gurin, Patricia	University of Michigan
172.	Gutierrez, Kris	University of California, Berkeley
173.	Hakuta, Kenji	Stanford University
174.	Hall, Aris	Clemson University
175.	Hall, Gordon	University of Oregon
176.	Han, Hahrie	University of California, Santa Barbara
177.	Hancock Alfaro, Ange-Marie	University of Southern California
178.	Hardie, Jessica	Hunter College, City University of New York
179.	Harper, Shaun	University of Southern California
180.	Hart, Jeni	University of Missouri
181.	Hartlep, Nicholas	Metropolitan State University
182.	Haslerig, Siduri	University of Oklahoma
183.	Hatch-Tocaimaza, Deryl	University of Nebraska
184.	Heller, Donald	University of San Francisco
185.	Hernandez, Xavier	University of California, Irvine
186.	Hildebrandt, Melanie	Indiana University of Pennsylvania
187.	Hillman, Nicholas	University of Wisconsin - Madison
188.	Hinchey, Patricia	Pennsylvania State University
189.	Hirschman, Daniel	Brown University
190.	Holme, Jennifer	University of Texas at Austin
191.	Hom, Delia Cheung	Northeastern University
192.	Horn, Catherine	University of Houston
193.	Hornak, Anne	Central Michigan University
194.	Houston, Derek	University of Oklahoma
195.	Hsieh, Betina	California State University, Long Beach
196.	Hsin, Amy	Queens College, City University of New York
197.	Hsu, Madeline	University of Texas at Austin
198.	Hudson, Tara	Kent State University
199.	Hughes, Bryce	Montana State University
200.	Humphries, Marisha	University of Illinois at Chicago

201. Hung, Yun-Ting   Metropolitan State University
202. Huo, Yuen   University of California, Los Angeles
203. Hurtado, Sylvia   University of California, Los Angeles
204. Inman, Arpana   Lehigh University
205. Ishimaru, Ann M.   University of Washington
206. Iverson, Susan   Manhattanville College
207. Jain, Dimpal   California State University, Northridge
208. Jayakumar, Uma   University of California, Riverside
209. Jenkins, DeMarcus   University of Arizona
210. Jeung, Russell   San Francisco State University
211. Jez, Su Jin   California State University, Sacramento
212. Johnson, Dawn   Syracuse University
213. Johnson, Matthew   Central Michigan University
214. Johnson, Royel   Pennsylvania State University
215. Johnston-Guerrero, Marc   Ohio State University
216. Jones, B. Noble   University of Georgia
217. Jourian, TJ   Oakland University
218. Junn, Jane   University of Southern California
219. Kanagala, Vijay   University of Vermont
220. Kang, Miliann   University of Massachusetts Amherst
221. Kawakyu O'Connor, Nahoko   University of Rochester
222. Kelly, Bridget   University of Maryland, College Park
223. Ken, Ivy   George Washington University
224. Kezar, Adrianna   University of Southern California
225. Kiang, Peter   University of Massachusetts Boston
226. Killen, Melanie   University of Maryland, College Park
227. Kim, Barbara   California State University, Long Beach
228. Kim, Jung   Lewis University
229. Kim, Nadia   Loyola Marymount University
230. Kim, Richard   University of California, Davis
231. Kim, Stephanie   Georgetown University
232. King, M. Bruce   University of Wisconsin - Madison
233. Kinzie, Jillian   Indiana University Bloomington
234. Kiuhara, Sharlene   University of Utah
235. Klasik, Daniel   George Washington University
236. Klemencic, Manja   Harvard University
237. Kodama, Corinne   University of Illinois at Chicago
238. Kohli, Rita   University of California, Riverside
239. Kokka, Kari   University of Pittsburgh
240. Kondo, Dorinne   University of Southern California
241. Kornhaber, Mindy   Pennsylvania State University

242.	Kortegast, Carrie	Northern Illinois University
243.	Kousser, J. Morgan	California Institute of Technology
244.	Kumashiro, Kevin	Independent Scholar
245.	Kwan, Yvonne	San Jose State University
246.	Kwon, Hyeyoung	Indiana University Bloomington
247.	Kwon, Yaejoon	Independent Scholar
248.	Lachica Buenavista, Tracy	California State University, Northridge
249.	Lai, James	Santa Clara University
250.	Lau, Anna	University of California, Los Angeles
251.	Lau, Chrissy	Texas A&M University - Corpus Christi
252.	Le, C.N.	University of Massachusetts Amherst
253.	Ledesma, María	University of Utah
254.	Lee Tu, Dawn	De Anza College
255.	Lee, C. Aujean	University of Oklahoma
256.	Lee, Fred	University of Connecticut
257.	Lee, Jennifer	Columbia University
258.	Lee, Jenny	University of Arizona
259.	Lee, Richard	University of Minnesota
260.	Lee, Stacey	University of Wisconsin - Madison
261.	Lehman, Kathleen J.	University of California, Los Angeles
262.	Lehr, Jane	California Polytechnic State University
263.	Lester, Jaime	George Mason University
264.	Leung, Maxwell	California College of the Arts
265.	Lewis, Amanda	University of Illinois at Chicago
266.	Lewis, Consuella	Concordia University Portland
267.	Lewis, Maria	Pennsylvania State University
268.	Li, Amy	University of Northern Colorado
269.	Lien, Pei-te	University of California, Santa Barbara
270.	Linde, Robyn	Rhode Island College
271.	Longerbeam, Susan	University of Louisville
272.	Lopez, Francesca	University of Arizona
273.	Louie, Vivian	William T. Grant Foundation
274.	Lu, Charles	University of California, San Diego
275.	Lugg, Catherine	Rutgers University
276.	Lui, Joyce	San Jose City College
277.	Luie, Siu Ming	Northeastern University
278.	MacLachlan, Anne	University of California, Berkeley
279.	Maeda, Daryl	University of Colorado Boulder
280.	Maira, Sunaina	University of California, Davis
281.	Malone, Mei-Ling	California State University, Fullerton
282.	Manzano, Lester	Loyola University Chicago

283. Maramba, Dina   Claremont Graduate University
284. Marcus, Ann   New York University
285. Marin, Patricia   Michigan State University
286. Marine, Susan B.   Merrimack College
287. Marquez Kiyama, Judy   University of Denver
288. Marsh, Tyson   Seattle University
289. Martin, Georgianna   University of Georgia
290. Martin, Isaac   University of California, San Diego
291. Martinez Aleman, Ana M. Boston College
292. Martinez, Brandon   Providence College
293. Martinez, Danny C.   University of California, Davis
294. Martinez, Eligio   Claremont Graduate University
295. Martinez, Magdalena   University of Nevada, Las Vegas
296. Martinez, Melissa   Texas State University
297. Martínez, Ramón   Stanford University
298. Masuoka, Natalie   University of California, Los Angeles
299. Mattheis, Allison   California State University, Los Angeles
300. Mayer, Anysia   California State University, Stanislaus
301. Mayorga, Edwin   Swarthmore College
302. McClellan, George   University of Mississippi
303. McClintock, Charles   Fielding Graduate University
304. McDermott, Kathryn   University of Massachusetts Amherst
305. McDonough, Patricia M.   University of California, Los Angeles
306. McEwen, Marylu   University of Maryland, College Park
307. McGowan, Brian   University of North Carolina at Greensboro
308. McGuire, Keon   Arizona State University
309. McLaughlin, Conor   Bowling Green State University
310. Means, Darris   University of Georgia
311. Mendoza-Reis, Noni   San Jose State University
312. Merseth, Julie Lee   Northwestern University
313. Mickelson, Roslyn Arlin University of North Carolina at Charlotte
314. Milano, Joy   Michigan State University
315. Milem, Jeffrey   University of California, Santa Barbara
316. Mintz, Beth   University of Vermont
317. Mirra, Nicole   Rutgers University
318. Mistry, Rashmita   University of California, Los Angeles
319. Mitra, Dana   Pennsylvania State University
320. Mobley, Jr., Steve   University of Alabama
321. Moore, Helen   University of Nebraska
322. Morales, Erica   California State Polytechnic University, Pomona
323. Morales, P. Zitlali   University of Illinois at Chicago

324.	Morgan, Demetri	Loyola University Chicago
325.	Morgan, Zachary	California Institute of the Arts
326.	Moses, Michele	University of Colorado Boulder
327.	Moses, Yolanda	University of California, Riverside
328.	Motha, Suhanthie	University of Washington
329.	Munoz, Susana	Colorado State University
330.	Museus, Samuel	University of California, San Diego
331.	Myers, Kit	University of California, Merced
332.	Nakae, Sunny	Loyola University Chicago
333.	Nakagawa, Kathryn	Arizona State University
334.	Nakano, Dana	California State University, Stanislaus
335.	Nam, Victoria	California State University, Monterey Bay
336.	Narui, Mitsu	Capital University
337.	Navarro, Oscar	California Polytechnic State University
338.	Negrón-Gonzales, Genevieve	University of San Francisco
339.	Nelson Laird, Thomas	Indiana University Bloomington
340.	Nelson, Chris	University of Denver
341.	Ngo, Bic	University of Minnesota
342.	Ngo, Federick	University of Nevada, Las Vegas
343.	Nguyen, Bach Mai Dolly	Lewis & Clark College
344.	Nguyen, David Hoa	Indiana University - Purdue University, Indianapolis
345.	Nguyen, Thai-Huy	Seattle University
346.	Nicolazzo, Z	University of Arizona
347.	Nienhusser, H. Kenny	University of Connecticut
348.	Nieto, Sonia	University of Massachusetts Amherst
349.	Noah, Aggie	Arizona State University
350.	Noguera, Pedro	University of California, Los Angeles
351.	Noh, Eliza	California State University, Fullerton
352.	Oakes, Jeannie	University of California, Los Angeles
353.	Obear, Kathy	Center for Transformation and Change
354.	Ocampo, Anthony	California State Polytechnic University, Pomona
355.	Oda, Meredith	University of Nevada, Reno
356.	Okamoto, Dina	Indiana University
357.	Oliva, Maricela	University of Texas at San Antonio
358.	Olivas, Michael A.	University of Houston
359.	Oluwole, Joseph	Montclair State University
360.	Ong, Paul	University of California, Los Angeles
361.	Ono, Kent	University of Utah
362.	Orfield, Gary	University of California, Los Angeles
363.	Orphan, Cecilia	University of Denver
364.	Oseguera, Leticia	Pennsylvania State University

365. Ozaki, Casey (Carolyn)   University of North Dakota
366. Pacheco, Denise   University of California, Los Angeles
367. Padios, Jan   University of Maryland, College Park
368. Paguyo, Christina   University of Denver
369. Park, Jerry   Baylor University
370. Park, John   University of California, Santa Barbara
371. Park, Moises   Baylor University
372. Parker, Eugene   University of Kansas
373. Parker, Tara   University of Massachusetts Boston
374. Parreñas, Rhacel   University of Southern California
375. Patel, Leigh   University of Pittsburgh
376. Patraporn, Varisa   California State University, Long Beach
377. Patton Davis, Lori   Indiana University - Purdue University, Indianapolis
378. Pendakur, Sumun   University of Southern California
379. Perez II, David   Miami University
380. Perez, Patricia A.   California State University, Fullerton
381. Perez, Rosemary   Iowa State University
382. Perez-Felkner, Lara   Florida State University
383. Perna, Laura   University of Pennsylvania
384. Pham, Minh-Ha   University of California, Berkeley
385. Poon, OiYan   Colorado State University
386. Pope, Raechele   University at Buffalo
387. Porter, Christa   Kent State University
388. Posselt, Julie   University of Southern California
389. Powers, Jeanne M.   Arizona State University
390. Quintanar, Rosalinda   San Jose State University
391. Ramirez, Hiram   California State University, Channel Islands
392. Ramirez, Ricardo   University of Notre Dame
393. Ramirez-Stapleton, Marcela   University of California, Irvine
394. Ramos, Aida   George Fox University
395. Ramos, Delma   University of North Carolina at Greensboro
396. Reddick, Richard J.   University of Texas at Austin
397. Renée Valladares, Michelle   University of Colorado Boulder
398. Rennick, Liz   University of Arizona
399. Reyes, Pedro   University of Texas at Austin
400. Reynolds, Amy   University at Buffalo
401. Riggers-Piehl, Tiffani   University of Missouri, Kansas City
402. Rincón, Blanca   University of Nevada, Las Vegas
403. Rios Aguilar, Cecilia   University of California, Los Angeles
404. Rivera, Gwendelyn   University of Southern California
405. Ro, Hyun Kyoung (Hyunny)   Bowling Green State University

406.	Robbins, Claire	Virginia Polytechnic Institute and State University
407.	Roberts, Maria	University of Nevada, Las Vegas
408.	Rodríguez, Noreen	Iowa State University
409.	Rodriguez, Robyn	University of California, Davis
410.	Rodriguez-Kiino, Diane	California Lutheran University
411.	Rooks, Curtiss	Loyola Marymount University
412.	Ropers-Huilman, Rebecca	University of Minnesota
413.	Rosiek, Gerald	University of Oregon
414.	Rowan-Kenyon, Heather	Boston College
415.	Rubin, Paul	University of Utah
416.	Ruck, Martin	The Graduate Center, City University of New York
417.	Sablan, Jenna	University of Maryland, College Park
418.	Saenz, Victor	University of Texas at Austin
419.	Saito, Leland	University of Southern California
420.	Sallee, Margaret	University at Buffalo
421.	Saw, Anne	DePaul University
422.	Schramm-Pate, Susan	University of Southern California
423.	Schuster, Maximilian	University of Pittsburgh
424.	Scott, Janelle	University of California, Berkeley
425.	Segal, Marcia Texler	Indiana University Southeast
426.	Segoshi, Megan	Independent Scholar
427.	Serna, Gabriel	Michigan State University
428.	Sewell, Christopher	Williams College
429.	Shallish, Lauren	College of New Jersey
430.	Sharma, Nitasha	Northwestern University
431.	Shek, Yen Ling	University of California, Los Angeles
432.	Shelton, Leslie	University of Arkansas
433.	Shih, Kristy	California State University, Long Beach
434.	Siegel-Hawley, Genevieve	Virginia Commonwealth University
435.	Silver, David	RTI
436.	Sipma-Dysico, Carlene	Lewis University
437.	Snyder, Seth	Carleton College
438.	Sohoni, Deenesh	College of William and Mary
439.	Solorzano, Daniel	University of California, Los Angeles
440.	Soria, Krista	University of Minnesota
441.	Spickard, Paul	University of California, Santa Barbara
442.	Squire, Dian	Northern Arizona University
443.	Stapleton, Lissa	California State University, Northridge
444.	Stearns, Elizabeth	University of North Carolina at Charlotte
445.	Stewart, Abigail	University of Michigan
446.	Stewart, Dafina-Lazarus	Colorado State University

447.	Stovall, David	University of Illinois at Chicago
448.	Strolovitch, Dara	Princeton University
449.	Strunk, Kamden	Auburn University
450.	Sule, Thandi	Oakland University
451.	Sun, Jeffrey	University of Louisville
452.	Sun-Hee Park, Lisa	University of California, Santa Barbara
453.	Sze, Julie	University of California, Davis
454.	Szpara, Michelle Y.	Cabrini University
455.	Takagi, Dana	University of California, Santa Cruz
456.	Talusan, Liza A.	Independent Scholar
457.	Tanaka, Gregory	Center for the Study of Democracy and Social Change
458.	Tang, Eric	University of Texas at Austin
459.	Taylor, Amanda	American University
460.	Taylor, Betty Jeanne	University of Texas at Austin
461.	Terriquez, Veronica	University of California, Santa Cruz
462.	Terry, La Mont	Occidental College
463.	Thompson Dorsey, Dana	University of Pittsburgh
464.	Tichavakunda, Antar	University of Cincinnati
465.	Tieken, Mara	Bates College
466.	Tienda, Marta	Princeton University
467.	Tierney, William	University of Southern California
468.	Tillapaugh, Daniel	California Lutheran University
469.	Tom, Joshua	Seattle Pacific University
470.	Tran, Hoang	Florida Atlantic University
471.	Tran, Van	Columbia University
472.	Trieu, Monica	Purdue University
473.	Tsing, Anna	University of California, Santa Cruz
474.	Tuck, Eve	University of Toronto
475.	Tuitt, Frank	University of Denver
476.	Turman, Natasha	Miami University Ohio
477.	Turner, Caroline	Sacramento State University
478.	Umemoto, Karen	University of California, Los Angeles
479.	Valadez, Concepcion	University of California, Los Angeles
480.	Valencia, Richard	University of Texas at Austin
481.	Valladares, Siomara	University of Colorado Boulder
482.	Vang, Ma	University of California, Merced
483.	Varghese, Manka	University of Washington
484.	Vasquez Heilig, Julian	California State University, Sacramento
485.	Vélez, Verónica	Western Washington University
486.	Venegas, Kristan	University of Southern California

487.	Villanueva, George	Loyola University Chicago
488.	Vo, Anne	University of Southern California
489.	Vo, Linda	University of California, Irvine
490.	Vue, Rican	Oregon State University
491.	Wallace, Sophia	University of Washington
492.	Walsh, Erin	Bryn Mawr College
493.	Wang, Leslie	University of Massachusetts Boston
494.	Wang, Oliver	California State University, Long Beach
495.	Ward, LaWanda	Pennsylvania State University
496.	Warren, Mark	University of Massachusetts Boston
497.	Watanabe, Paul	University of Massachusetts Boston
498.	Waters, Mary	Harvard University
499.	Weidman, John	University of Pittsburgh
500.	Welner, Kevin	University of Colorado Boulder
501.	Wilson, Terri S.	University of Colorado Boulder
502.	Winkle-Wagner, Rachelle	University of Wisconsin - Madison
503.	Wolf, De'Sha	Portland State University
504.	Wolf-Wendel, Lisa	University of Kansas
505.	Wolniak, Gregory	University of Georgia
506.	Wong, Janelle	University of Maryland, College Park
507.	Wong, Tom K.	University of California, San Diego
508.	Wright, Dwayne	Savannah Law School
509.	Wright, Erin Kahunawaikaʻala	University of Hawaiʻi, Mānoa
510.	Wu, Ellen	Indiana University Bloomington
511.	Wu, Judy	University of California, Irvine
512.	Wun, Connie	Transformative Research
513.	Yamamura, Erica	Seattle University
514.	Yamashiro, Jane	Mills College
515.	Yao, Christina	University of Nebraska
516.	Yee, Barbara	University of Hawaiʻi, Mānoa
517.	Yee, Jennifer	California State University, Fullerton
518.	Yeung, Fanny	California State University, East Bay
519.	Yi Borromeo, Varaxy	California State University, Fresno
520.	Yoon, Irene	University of Utah
521.	York, Travis	Association of Public & Land-Grant Universities
522.	Young, Cynthia Ann	Pennsylvania State University
523.	Yun, John	Michigan State University
524.	Zamani-Gallaher, Eboni	University of Illinois at Urbana-Champaign
525.	Zane, Nolan	University of California, Davis
526.	Zatz, Marjorie S.	University of California, Merced
527.	Zentella, Ana Celia	University of California, San Diego

528.	Zerquera, Desiree	University of San Francisco
529.	Zhou, Min	University of California, Los Angeles
530.	Zulueta, Benjamin	University of California, Santa Barbara
531.	Zúñiga, Ximena	University of Massachusetts Amherst