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Short Hills, NJ 07078
September 28, 2015

Ms. Catherine Lhamon
Assistant Secretary
Office for Civil Rights (OCR)
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Assistant Secretary Lhamon:

Based on a preliminary review of the Office for Civil Rights's September 9, 2015 report on alleged discrimination against Asian Americans by Princeton University, the Asian American Coalition for Education finds the report's conclusion shocking, disappointing and unconvincing because the following reasons:

1. The OCR's investigation methods rely significantly on interviews of Princeton staff, who are unlikely to admit they have committed any wrongdoing— discriminatory practices against Asian American applicants. When analyzing the records, OCR failed to conduct any vigorous statistical analysis to examine whether or not there is a discrimination pattern against Asian American applicants in Princeton's admission practices.
2. This report ignores or fails to adequately address extensive and compelling discriminatory evidence compiled by Daniel Golden, Thomas Espenshade, Alexandra Radford and Richard Sander. This report relies on an inadequate qualitative analysis and errs by concluding that Princeton does not use race as a defining factor. Indeed, this report fails to disprove the fact that Asian American applicants have always been held to the highest standards in both academic and non-academic areas. According to Thomas Espenshade & Alexandra Radford, on average, Asian Americans have had to score on average approximately 140 points higher than a White student, 270 points higher than a Hispanic student and 450 points higher than a Black student on the SAT in order to be admitted to America's elite schools. Richard Sander proved there is no evidence to indicate Asian American students rank weaker in non-academic criteria.
3. Though it says the race factor alone may not always qualify students in other racial groups, this report was unable to disprove that, if given the same academic and non-academic qualifications, in majority of cases, race becomes a negative eliminating factor for Asian American applicants. Here, OCR failed to demonstrate that investigators controlled other variables while assessing the impact of race on Princeton's admission decisions.

4. This report disclosed Princeton University employs a highly subjective and opaque holistic approach to evaluate its applicants. It lacks objectivity and transparency. It also has no clear definition of its desired diversity level and how it achieves it in an objective way. Because of such subjectivity, the OCR report fails to convince Asian American communities Princeton does not discriminate against Asian American applicants unless it proves that 1) statistically Asian American applicants are not held to a higher standard, 2) statistically race is not a negative eliminating factor for Asian American applicants and 3) Princeton's admission rate is comparable to Asian American students' achievements in other areas, such as Presidential Scholars and National Merit Scholarship. Only this way, OCR can prove that Princeton University's use of race has not unduly burdened Asian American applicants, which is essential to comply with relevant Supreme Court Rulings.
5. We were also perplexed that OCR totally ignored Michael Wang's May 2013's complaint against Princeton University and prematurely gave Princeton University a green light for its questionable admission practice without completing investigations of all pending complaints. Since Michael Wang filed his complaint in May 2013, OCR should have sufficient time to include his complaint in this investigation unless OCR decided only to review the ones that support your pre-determined conclusion.

Though we appreciate OCR has spent efforts in conducting this investigation and welcome that Princeton started to admit more Asian American students, based on OCR's flawed methods and unexplainable omission of an important complaint, the Asian American Coalition for Education hereby rejects the conclusion of your report. Moreover, based on your record of having dismissed our earlier complaint against Harvard University in spite of compelling evidence, we seriously doubt OCR can conduct an objective investigation without a supervisory panel that includes representatives from the Asian American community.

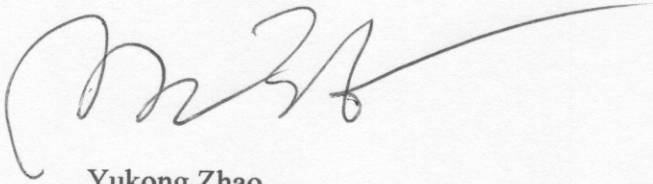
As a result, we strongly urge your office reopen the investigation of Princeton University for its alleged discrimination against Asian American applicants and implement the following vigorous and credible methods.

1. OCR should revise the investigation to include Michael Wang's case and other pending complaints.
2. Using statistical analysis, OCR should examine whether or not Asian American applicants are held to much higher standards than other ethnic groups.
3. Using statistical analysis with controlled variables, OCR should examine if given similar qualifications of other applicants, whether race is a main factor for Princeton University's rejection of Asian American applicants.
4. Form an oversight committee including Asian American representatives to ensure the objectivity of such investigations.
5. Require Princeton to publish admission data based on race and qualifications of admitted students as well as applicants, to allow public and concerned stakeholders to review.

We believe our above suggestions are reasonable and essential for OCR to conduct responsible and objective investigations into alleged racial discrimination against Asian Americans in education. Protecting us from such discrimination is the stated purpose of the OCR.

We look forward to hearing from you!

Sincerely,

A handwritten signature in black ink, appearing to read 'Yukong Zhao', with a long, sweeping horizontal line extending to the right.

Yukong Zhao
Chair, Organizing Committee
Asian American Coalition for Education