

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DO NO HARM,

Plaintiff,

v.

KENYA L. EDDINGS, in her official capacity
as Arkansas Minority Health Commission
Executive Director,

Defendant.

Case No. 4:23-cv-347-LPR

ORAL HEARING REQUESTED

**PLAINTIFF DO NO HARM'S MEMORANDUM OF LAW
IN SUPPORT OF ITS MOTION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION**

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INTRODUCTION

The Arkansas Minority Health Commission (AMHC) runs a scholarship—the Minority Healthcare Workforce Diversity Scholarship—that discriminates against students based on their skin color. To be eligible for the scholarship, an applicant must “confirm that [he is] a racial minority,” meaning “African American, Hispanic, Native American/American Indian, Asian American or Marshallese.” *See* Ex. A at 2; *see also* Ex. B at 2, 3. In other words, Arkansas’s white and Arab-American students need not apply.

The scholarship is blatantly illegal. “Classifications of citizens solely on the basis of race are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.” *Shaw v. Reno*, 509 U.S. 630, 643 (1993) (cleaned up). The “central mandate” of the Equal Protection Clause is “racial neutrality.” *Miller v. Johnson*, 515 U.S. 900, 904 (1995). Discrimination based on skin color “is presumptively invalid,” *Shaw v. Reno*, 509 U.S. 630, 643 (1993), and racial classifications are reviewed “under strict scrutiny,” *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 227 (1995). Under that rubric, a defendant must “assert a compelling state interest” and “demonstrate that its [program] is necessary to serve the asserted interest.” *Burson v. Freeman*, 504 U.S. 191, 199 (1992). The outright exclusion of an entire racial group cannot satisfy strict scrutiny.

Plaintiff, Do No Harm, has at least one member (Member A) who satisfies all the eligibility requirements under the scholarship except one—Member A is white and not Hispanic. Member A is able and ready to apply to the scholarship for the Fall 2023 semester (and later semesters) if Defendant stops racially excluding white applicants.¹ Based on past scholarship cycles, Do No Harm expects that the deadline for the Fall 2023 semester will sometime in June 2023. *See* Ex. C (“[d]eadline to apply for

¹ Defendant’s scholarship is available for the “[f]all semester and spring semester.” *See* Ex. B at 4; Ex. C at 2; Ex. D at 4 (Spring 2023); Ex. E at 4 (“Scholarships are awarded twice per year,” including “for the Fall 2022 school semester”).

the” Fall 2022 scholarship was “June 24th, 2022, by 5:00p.m., CST”). Do No Harm respectfully requests that the Court issue a temporary restraining order and preliminary injunction barring Defendant from making any scholarship selections for Fall 2023 and subsequent semesters by using the existing, racially exclusionary criteria during the pendency of this action. Because the application process for the next round of scholarships likely ends in June 2023, Do No Harm respectfully asks this Court to grant its motion for temporary restraining order **as soon as possible**, and to rule on the motion for preliminary injunction by **May 31, 2023**.

BACKGROUND

A. The Arkansas Minority Health Commission and the Arkansas Department of Health provide racially exclusive scholarships.

Arkansas has “established the Arkansas Minority Health Commission.” Ark. Code §20-2-102. Arkansas law declares that the “Department of Health” “shall collaborate with the commission to achieve healthcare equity in the State of Arkansas.” §20-2-103(a)(2)(B)(i). The law also requires that AMHC “report to the Secretary of the Department of Health” its work, including “[o]utlining plans for continuing and expanding in the coming year the program to reduce disparities in health and health care in this state.” §20-2-106. Arkansas has “created a cash fund” for AMHC “to be used for expenses.” §20-2-205(a). Arkansas also permits AMHC to “receive grants and donations,” “which shall be deposited in the State Treasury as cash funds and may be used for reimbursements for expenses of providing seminars or educational activities.” §20-2-205(b). Among other powers and duties, AMHC must “[p]ublish evidence-based data, define state goals and objectives, and develop pilot projects for decreasing” “racial and ethnic minority disparities in health and health care.” §20-2-103(a)(7)(A), (8).

AMHC has exercised its powers to create the Minority Health Workforce Diversity Scholarship and has promulgated “Rules and Regulations” for the scholarship’s governance. Ex. B at 2. Rule 1 declares that AMHC “shall administer” the scholarship. *Id.* “All formal communications shall be addressed to or signed by the Director” of AMHC, *id.*, who is Defendant Eddings, Compl. (Doc. 1)

¶7; Ex. A at 2; Ex. D at 4; Ex. E at 4. The “Director ... has the final responsibility for selecting scholarship recipients pursuant to [the] mission, vision and goals of the Commission.” Ex. B at 2.

AMHC’s stated “goal of the scholarship is to help increase diversity in the state’s healthcare workforce.” *See* Ex. B at 2. To further that goal, AMHC has established the following eligibility requirements:

Scholarship Eligibility Criteria

An applicant must meet the following requirements to be eligible to receive the Minority Health Workforce Diversity Scholarship:

- Must be a U.S. citizen or permanent resident alien
- Must be a bona fide resident of the state as defined by the Department of Higher Education for a minimum of 12 months immediately before the date on which the student applies
- Must be enrolled in a program of study that leads to or is creditable towards a field of health (i.e. medicine, nursing, pharmacy, dental, radiology, allied health, public health and/or health related professions)
- Must certify they are tobacco-free and must pledge in writing on the application form to refrain from the use of tobacco
- Must represent a racial minority population underrepresented in health workforce (i.e. Black American, Hispanic American, Native American/American Indian, Asian American and Marshallese)

Id.

AMHC’s racial exclusion is manifest in other parts of the scholarship’s rules and regulations. Rule 2(F) states that “[a]pplicants must represent a racial minority population underrepresented in health workforce,” a category that “include[s]: Black American, Hispanic American, Native American/American Indian, and Asian American.” *Id.* at 3. Rule 3 states that “[a]ny interested minority student planning to enroll in an eligible public or private college or university in Arkansas may apply.” *Id.* And the rules and regulations separately define “eligible applicant” to mean “minority applicant.” *Id.* at 5; *see also* Ark. Code §20-2-101(2) (“Minority’ means black Americans, Hispanic Americans, Asian Americans, and American Indians.”). So, white students are categorically prohibited from competing for the \$1,000 scholarship Defendant awards to eligible full-time students. *Id.* at 2-3.

Consistent with its rules and regulations, AMHC has expressly discriminated against white students on its past application forms. AMHC under Defendant Eddings and the Arkansas Department of Health created and published the “**Spring** semester of **2023**” application form. Ex. A at 2. Under a section titled “Eligibility,” the application requires that students confirm their eligibility by signing their “initial” next to each eligibility criterion. *Id.* One of the criteria students must confirm is stated as follows: “I confirm that I am a racial minority (African American, Hispanic, Native American/American Indian, Asian American or Marshallese).” *Id.* So, although students “must complete the Minority Health Workforce Diversity Scholarship application and essay” by the “deadline for receipt of applications,” Ex. B at 3, the application form makes it impossible for white or Arab-American students to do so without lying about their race, *see* Ex. A at 2, 5 (requiring applicants to confirm by “signing ... that all the information provided above ... is true and correct”); Member A Decl. ¶11.

Defendant has applied AMHC’s racially exclusive rules and regulations to past application cycles. Recently, the Department of Health publicly confirmed that AMHC “awarded \$27,500 in scholarships to 29 *minority* students pursuing careers in health care and public health for the Spring 2023 school semester.” Ex. D at 4 (emphasis added). Consistent with AMHC’s stated “goal ... to help increase diversity in the state’s healthcare workforce,” *see* Ex. B at 2, Defendant stated that the selected students “will help close the minority workforce diversity gap,” Ex. D at 4. Similarly, for the Fall 2022 semester, AMHC awarded “\$26,000 in scholarships to 28 minority students pursuing careers in health care and public health.” Ex. E at 4. Defendant reiterated AMHC’s concern about the “ever-increasing gap in minority representation in the health care workforce.” *Id.*

B. Do No Harm has white members who are ineligible to apply to the scholarship based solely on their race.

Do No Harm is a nationwide membership organization consisting of a diverse group of physicians, healthcare professionals, students, patients, and policymakers who want to protect healthcare from a radical, divisive, and discriminatory ideology. Compl. ¶4; Rasmussen Decl. ¶3. Do No Harm

accomplishes its mission through education and advocacy about the divisive and discriminatory ideas being embedded within medical education, training, research, practice, and policy. Compl. ¶5; Rasmussen Decl. ¶3. It has, among other things, sued the Biden administration for introducing discriminatory “equity” criteria into Medicare, sued private medical organizations for creating racially exclusive fellowships, and filed OCR complaints against medical schools that create fellowships and scholarships that exclude students based on race. Compl. ¶5; Rasmussen Decl. ¶3.

Do No Harm has at least one member who is being harmed by Defendant’s racially discriminatory scholarship. Compl. ¶6; Rasmussen Decl. ¶¶4-9. Member A meets all nonracial criteria for applying to the scholarship. Compl. ¶41; Mem. A Decl. ¶¶3, 4-11. Member A, a sophomore, is currently enrolled as a full-time pre-nursing student at a public university in Arkansas. Compl. ¶33; Mem. A Decl. ¶¶6-7; Rasmussen Decl. ¶¶7-8. Member A is a U.S. citizen, was raised in Arkansas, and has been a resident of Arkansas for more than 12 months. Compl. ¶¶34-35; Mem. A Decl. ¶5. Member A is tobacco-free and would pledge in writing to refrain from the use of tobacco. Compl. ¶38; Mem. A Decl. ¶10. But Member A does not satisfy the scholarship’s racial criterion because Member A is non-Hispanic white. Compl. ¶39; Member A Decl. ¶¶3, 11; Rasmussen Decl. ¶9.

Member A is able and ready to apply to the scholarship for the next cycle if Defendant stops discriminating against white applicants. Compl. ¶42; Mem. A Decl. ¶11. Member A would like to apply to the scholarship because it would provide her with financial assistance as she pursues her health-related education and career.² Compl. ¶40; Mem. A Decl. ¶8. Member A expects to be a full-time pre-nursing student in Arkansas in the Fall 2023 semester, and a full-time nursing student in the Spring 2024, Fall 2024, and Spring 2025 semesters. Compl. ¶36; Mem. A Decl. ¶¶6-7. However, Member A

² According to AMHC’s advertisement of the scholarship, “If you desire to be a nurse, physician, pharmacist, dentist, nutritionist or anything in the field of health, this scholarship is for you!” Ex. C at 2.

is barred from the scholarship solely on account of race. Compl. ¶¶39, 41; Mem. A Decl. ¶¶3, 11. If the Fall 2023 and future application forms continue to require that applicants confirm that they are a racial minority, Member A cannot truthfully complete them. Compl. ¶¶14, 24, 39; Mem. A Decl. ¶11.

ARGUMENT

Do No Harm is entitled to a temporary restraining order and a preliminary injunction if it can demonstrate that the following four factors weigh in its favor: “(1) the threat of irreparable harm to the movant; (2) the state of balance between this harm and the injury that granting the injunction will inflict on other parties litigant; (3) the probability that [the] movant will succeed on the merits; and (4) the public interest.” *D.M. by Bao Xiong v. Minnesota State High Sch. League*, 917 F.3d 994, 999 (8th Cir. 2019); *Little Rock Fam. Plan. Servs. v. Rutledge*, 458 F. Supp. 3d 1065, 1071 (E.D. Ark. 2020) (“The same standards are applied to motions for temporary restraining orders.”). “While no single factor is determinative, the probability of success factor is the most significant.” *Carson v. Simon*, 978 F.3d 1051, 1059 (8th Cir. 2020) (cleaned up).

A. Do No Harm is likely to succeed on the merits.

AMHC is denying white students like Member A “the equal protection of the laws.” U.S. Const. amend. XIV, §1; *see* 42 U.S.C. §1983. The “central mandate” of equal protection is “racial neutrality.” *Miller*, 515 U.S. at 904. Whenever an individual is treated “unequally because of his or her race, that person has suffered an injury that falls squarely within the language and spirit of the Constitution’s guarantee of equal protection.” *Adarand Constructors, Inc.*, 515 U.S. at 229-30.

“[A]ll racial classifications ... must be analyzed by a reviewing court under strict scrutiny.” *Id.* at 227. This is true “even for so-called ‘benign’ racial classifications.” *Johnson v. California*, 543 U.S. 499, 505 (2005); *accord Kohlbeck v. City of Omaha*, 447 F.3d 552, 555 (8th Cir. 2006) (“We apply strict scrutiny to all governmental distinctions on the basis of race.”). Because Defendant’s scholarship facially excludes white students, Ex. A; Ex. B, Defendant must satisfy strict scrutiny.

Strict scrutiny is a “searching examination, and it is the government that bears the burden to prove that the reasons for any racial classification are clearly identified and unquestionably legitimate.” *Fisher v. Univ. of Tex. at Austin*, 570 U.S. 297, 310 (2013) (cleaned up). “Applying strict scrutiny, a racial classification is constitutional, under the Equal Protection Clause of the Fourteenth Amendment, only if it is a narrowly tailored measure that furthers a compelling governmental interest.” *Kobllbek*, 447 F.3d at 555. Defendant cannot satisfy strict scrutiny.

First, no compelling governmental interest justifies the complete exclusion of white students from the scholarship. The only legally permissible interest that the AMHC or the Department of Health could claim is remedying the present effects of their own past intentional discrimination in healthcare. *See City of Richmond v. J.A. Croson Co.*, 488 U.S. 469, 498 (1989). But this is not the “actual” goal that the AMHC seeks to accomplish. *Shaw v. Hunt*, 517 U.S. 899, 908 n.4 (1996). Instead, AMHC’s stated “goal of the scholarship is to help increase diversity in the state’s healthcare workforce, which *could* have positive effects on” health. *See* Ex. B at 2 (emphasis added); *see also* Ark. Code §20-2-103(a)(2)(B)(i) (“Department of Health” “shall collaborate with the commission to achieve healthcare equity in the State of Arkansas.”); §20-2-106 (AMHC “[o]utlin[es] plans for continuing and expanding in the coming year the program to reduce disparities in health and health care in this state.”); §20-2-103(a)(7)(A), (8) (AMHC must “[p]ublish evidence-based data, define state goals and objectives, and develop pilot projects for decreasing” “racial and ethnic minority disparities in health and health care”). Indeed, Defendant herself recently justified her discriminatory selection of students on the ground that the selected students “will help close the minority workforce gap.”³ Ex. D at 4.

³ Defendant’s justification that “[t]here is an ever-*increasing* gap in minority representation in the health care workforce,” Ex. E at 4 (emphasis added), undermines any suggestion that discriminatory selection is aimed at remedying the effects of decades-old intentional discrimination.

That won't do. Neither "racial balancing" nor "the imposition of racial proportionality" is a compelling interest. *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 730-31 (2007). And if, as here, a racial classification "is *the* factor" that is, "for some students, ... determinative standing alone," then an appeal to "diversity" fails to justify the classification. *See id.* at 723; *see also id.* (rejecting a "limited notion of diversity" that "view[ed] race exclusively in white/nonwhite terms"); *see also, e.g., MD/DC/DE Broads. Ass'n v. FCC*, 236 F.3d 13, 21 (D.C. Cir. 2001) (employment practices favoring certain race groups to promote "programming diversity" was not compelling interest); *Lomack v. City of Newark*, 463 F.3d 303, 309-10 (3d Cir. 2006) (diversity in workplace for the fire department did not amount to compelling interest). So AMHC has not identified an interest that could justify "den[ying] certain citizens the opportunity to compete for" a public benefit "based solely upon their race." *Croson*, 488 U.S. at 493.

Even if AMHC's actual purpose were to remedy the effects of the state's own past discrimination, that still wouldn't be a compelling interest here. AMHC has failed to "identify that discrimination, public or private, with some specificity *before*" it imposed its racial exclusion. *Hunt*, 517 U.S. at 909 (emphasis added). "[A] generalized assertion that there has been past discrimination in an entire industry" cannot justify an outright racial exclusion. *Croson*, 488 U.S. at 497-99. Even if there were "no doubt" that Arkansas has a "sorry history of both private and public discrimination" in the healthcare industry, that "observation, standing alone, cannot justify a rigid racial quota in the awarding of" a public benefit. *Id.* at 499. "[A]n amorphous claim that there has been past discrimination in a particular industry *cannot* justify the use of an unyielding racial quota." *Id.* (emphasis added). "Unyielding" describes precisely the outright racial exclusion in the rules and regulations that govern AMHC's scholarship. *See* Ex. B.

Moreover, "the institution that makes the racial distinction must have had a 'strong basis in evidence' to conclude that remedial action was necessary, *before* it embarks on an affirmative-action

program.” *Hunt*, 517 U.S. at 910. There is no evidence in the application or in the rules and regulations that AMHC analyzed prior discrimination as the cause of disparities. *See* Ex. B. Likewise, there is no evidence that AMHC concluded based on evidence that a complete racial exclusion is necessary to remedy past discrimination in the healthcare workforce. *Id.* So no compelling interest justifies AMHC’s outright racial exclusion.

Second, AMHC also cannot show that its scholarship’s racial exclusion is narrowly tailored. Narrow tailoring requires “the most exact connection between justification and classification.” *Wygant v. Jackson Bd. Of Educ.*, 476 U.S. 267, 280 (1986). It also requires that a racial classification be “necessary” to accomplish the compelling interest. *See Parents Involved*, 551 U.S. at 734-35.

AMHC cannot show an “exact connection” between its racially exclusive scholarship and its goal to promote diversity in healthcare. An outright exclusion of all white applicants is not “exact[ly] connect[ed],” *Wygant*, 476 U.S. at 280, to AMHC’s stated objective of increasing diversity in the healthcare workforce. *See Gratz v. Bollinger*, 539 U.S. 244, 271-72 (2003) (automatic 20 points awarded to “underrepresented minority” applicants solely because of race was not narrowly tailored); *cf. MD/DC/DE Broads. Ass’n*, 236 F.3d at 22 (“a sweeping requirement is the antithesis of rule narrowly tailored to meet a real problem”).

There is likewise no exact connection between AMHC’s outright racial exclusion and remedying past discrimination. *See Kohlbeck*, 447 F.3d at 555-56 (holding that racial classification was “not narrowly tailored to further the goal of remedying past discrimination” because government employed “the use of racial classifications in situations where there is no identified past discrimination”). A scholarship is not “a tailored remedy program” unless disparities are based on “an accurate determination of ... the extent to which that disparity flows from past discrimination,” *Podberesky v. Kirwan*, 38 F.3d 147, 160 (4th Cir. 1994)—a determination that’s absent here.

Other problems abound. The scholarship takes account of academic excellence, Ex. A at 3, even though “[h]igh achievers, whether African-American or not, are not the group [in healthcare] against which [AMHC or the Department of Health] discriminated in the past,” *see Kirwan*, 38 F.3d at 158 (holding that a racially exclusive scholarship was not narrowly tailored). The scholarship inexplicably excludes Arab Americans, even though that group has suffered discrimination. And it includes Asian Americans, even though there’s no evidence that the group is “underrepresented” in health generally or that any underrepresentation in Arkansas is “based on present effects of past discrimination.” *See Kirwan*, 38 F.3d at 160. As the Supreme Court has explained, “one may legitimately ask why” black students would be “forced to share this ‘remedial relief’ with a[] [person belonging to another preferred racial group] who move[d] to [Arkansas]” a year ago. *Crosby*, 488 U.S. at 506. In short, an outright racial exclusion in a scholarship “cannot be said to be narrowly tailored to any goal, except perhaps outright racial balancing.” *Kirwan*, 38 F.3d at 160.

Nor can AMHC show that the racial exclusion in its scholarship is necessary. To make this showing, Defendant must prove that it “considered methods other than explicit racial classification to achieve [its] stated goals.” *Parents Involved*, 551 U.S. at 735. But there is no evidence that AMHC ever considered a race-neutral alternative. *See Kirwan*, 38 F.3d at 161 (holding that a “University’s choice of a race-exclusive merit scholarship program as a remedy cannot be sustained” in part because “the University ha[d] not made any attempt to show that it ha[d] tried, without success, any race-neutral solutions”). Given AMHC’s goal to promote minority health, Ex. B at 2; Ex. E at 4, obvious alternatives were available that would be better tailored than race. For example, AMHC could have restricted its scholarship to students with a particular interest in health problems that disproportionately affect minority communities. Instead, it decided to completely exclude students based entirely on race.

B. Do No Harm and its members will suffer irreparable harm without immediate relief.

Do No Harm and Member A’s injuries are irreparable because Member A is suffering from racial discrimination in violation of the Equal Protection Clause. “[O]ne form of injury under the Equal Protection Clause is being forced to compete in a race-based system that may prejudice the plaintiff.” *Parents Involved*, 551 U.S. at 719. “The injury in cases of this kind is that a ‘discriminatory classification prevent[s] the plaintiff from competing on an equal footing.’” *Adarand*, 515 U.S. at 211. The injury is “the denial of equal treatment resulting from the imposition of the barrier, not the ultimate inability to obtain the benefit.” *Ne. Fla. Chapter of Assoc. Gen. Contractors of Am. v. City of Jacksonville*, 508 U.S. 656, 666 (1993).

That injury is irreparable. “The violation of a constitutionally protected right constitutes ‘irreparable harm,’” including where a plaintiff shows “that he has been unconstitutionally discriminated against.” *Smith v. S. Dakota*, 781 F. Supp. 2d 879, 887 (D.S.D. 2011) (quoting *Kirkeby v. Furness*, 52 F.3d 772, 775 (8th Cir. 1995)); accord *Jernigan v. Crane*, 64 F. Supp. 3d 1260, 1287-88 (E.D. Ark. 2014), *aff’d*, 796 F.3d 976 (8th Cir. 2015) (“inability to exercise ... fundamental right ... has caused irreparable harm”); *Mills v. District of Columbia*, 571 F.3d 1304, 1312 (D.C. Cir. 2009). So Do No Harm’s “showing that the [scholarship] interfered with ... the [constitutional] rights of its [members] supports a finding of irreparable injury.” *Planned Parenthood v. Citizens for Cmty. Action*, 558 F.2d 861, 867 (8th Cir. 1977); see also, e.g., *Coal. for Equity & Excellence in Md. Higher Ed. v. Md. Higher Ed. Comm’n*, 295 F. Supp. 3d 540, 556 (D. Md. 2017) (“Irreparable injury comes from the maintenance of segregative policies[.]”); *L.E.A. v. Bedford Cnty. Sch. Bd.*, 2015 WL 4460352, at *4 (W.D. Va. July 21, 2015) (“Assuming Plaintiffs are able to prevail on the merits of their Equal Protection claim, they will suffer irreparable harm.”); cf. *Hisp. Nat’l L. Enft Ass’n NCR v. Prince George’s Cty.*, 535 F.Supp.3d 393, 427 (D. Md. Apr. 21, 2021) (“Where the Court has found a likelihood of success on Plaintiffs’ equal protection claim, the deprivation of such a constitutional right alone would constitute irreparable harm.”).

Moreover, “[w]ithout injunctive relief or final resolution of th[is] suit,” Member A “will be prevented from competing next” scholarship cycle, *see Bao Xiong*, 917 F.3d at 1003—which is expected this summer, *see Ex. C* at 2. That “sort[] of injur[y], i.e., deprivations of temporally isolated opportunities, [is] exactly what preliminary injunctions are intended to relieve.” *Bao Xiong*, 917 F.3d at 1003. In short, “if the injunction is denied,” Member A will “suffer irreparable harm—namely, [Member A] will be prevented from trying out for” the scholarship “in probable violation of [Member A’s] constitutional rights.” *Id.*

C. The public interest and balance of the equities weigh in Do No Harm’s favor.

The public interest favors granting an injunction. “[I]t is ‘always in the public interest to prevent the violation of a party’s constitutional rights.’” *Brandt v. Rutledge*, 47 F.4th 661, 671-72 (8th Cir. 2022) (quoting *Bao Xiong*, 917 F.3d at 1004). Indeed, there is an overriding public interest in rooting out racial discrimination, especially by the government. Because Defendant is violating equal-protection rights, “the public interest ... factor favors” Do No Harm. *See Bao Xiong*, 917 F.3d at 1003-04.

The balance of the equities also favors Do No Harm. “If the injunction is granted,” Member A may apply to AMHC and compete on an equal footing. *See id.* at 1004. “The negative public consequences of such an allowance, if any, will be slight.” *See id.* “On the other hand, if the injunction is denied, [Member A] will continue to suffer irreparable harm—namely, [Member A] will be prevented from” competing on an equal footing “in probable violation of [Member A’s] constitutional rights.” *See id.* So the “balance of harms is decidedly in” Do No Harm’s favor. *See id.*

CONCLUSION

For all these reasons, this Court should grant Do No Harm’s motion for a temporary restraining order **as soon as possible** and its motion for preliminary injunction **by May 31, 2023**. This Court should grant a temporary restraining order and a preliminary injunction barring Defendant from selecting scholarship recipients using the existing, racially exclusionary criteria during the pendency of

this action. Defendant should be preliminarily “enjoined from enforcing that part of the qualifications for entry into the [scholarship] which require that the applicant be of the African-American [or other nonwhite] race[s].” *See Kirwan*, 38 F.3d at 162.

Dated: April 26, 2023

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'C.M.', is positioned above a horizontal line.

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CERTIFICATE OF SERVICE

I filed this memorandum with the Court via ECF. Because Defendant has not yet entered an appearance, I am also serving the motion, this memorandum, the exhibits, and the declarations by certified mail, returned receipt requested, at Defendant's address below. I am also sending copies of the same by certified mail, return receipt requested, to the Chair of the Arkansas Minority Health Commission and the Attorney General of Arkansas, at the addresses below.

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Little Rock, AR 72204

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Office of the Attorney General
323 Center Street
Suite 200
Little Rock, AR 72201

Dated: April 26, 2023



Cameron T. Norris

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DO NO HARM,

Plaintiff,

v.

KENYA L. EDDINGS, in her official capacity
as Arkansas Minority Health Commission
Executive Director,

Defendant.

Case No. 4:23-cv-347-LPR

Declaration of Kristina Rasmussen

I, Kristina Rasmussen, declare as follows:

1. I am over 18, of sound mind, and otherwise competent to sign this declaration.
2. I am the Executive Director of Do No Harm.
3. Do No Harm is a nationwide membership organization consisting of a diverse group of physicians, healthcare professionals, students, patients, and policymakers who want to protect healthcare from radical, divisive, and discriminatory ideologies and policies. Do No Harm accomplishes its mission through education and advocacy about the divisive and discriminatory ideas being embedded within medical education, training, research, practice, and policy. It has, among other things, sued the Biden administration for introducing discriminatory “equity” criteria into Medicare, sued private medical organizations for creating racially exclusive fellowships, and filed OCR complaints against medical schools that create fellowships and scholarships that exclude students based on race.
4. Do No Harm’s members are harmed by racially exclusionary programs and policies like what the Arkansas Minority Health Commission (AMHC) has created with the Minority Healthcare Workforce Diversity Scholarship. These programs exclude some of Do No Harm’s members because of their race.

5. Do No Harm has at least one member who is currently a student enrolled at a university in Arkansas.

6. I know the identity of Member A, who is a member of Do No Harm.

7. Member A attends an Arkansas university and is currently a college sophomore.

8. Member A is enrolled as a full-time pre-nursing student.

9. Member A wishes to apply to the AMHC's scholarship but cannot do so because Member A is white and non-Hispanic. Member A, however, is able and ready to apply to the scholarship once the AMHC stops discriminating.

10. As Executive Director of Do No Harm, I know the concerns of Do No Harm's members. It is my experience that medical professionals, health researchers, and students in the health field who disagree with, and are gravely concerned about, the corrosive effects of the racialization of medicine are not likely to speak out publicly for fear of retaliation. And they would be far less likely to join Do No Harm if they could not be anonymous.

11. For example, I know medical professionals, many of whom are Do No Harm members, who lost their jobs (or would face the threat of losing their jobs) if they decline to participate in so-called implicit bias training programs during which they must admit to unconsciously having racist biases and agree that the medical profession is systematically racist. Decent and honorable medical professionals who just want to care for everyone are concerned that these unjust racist labels sow distrust and weaken patients' confidence in the care they are receiving. These requirements are now being imposed through the legal and/or licensing regimes, and medical professionals often must participate in these programs as part of the continuing medical education. I am also aware of medical professionals, many of whom are Do No Harm members, who are afraid to speak out against these initiatives publicly because they fear losing their jobs or certifications.

12. In my experience, medical professionals are also afraid to raise their grave concerns about the declining quality of care because the medical training and research institutions' growing obsession with the so-called "diversity, equity, and inclusion" programs. For instance, Do No Harm found that medical schools are considering not only race, but also whether the applicants would support DEI efforts, in their admissions decisions. These schools are also doing away with the objective, measurable standards like the MCAT scores or grades for admissions or graduation requirements. Often, these schools will pay exorbitant speaker fees for DEI speakers instead of using those resources toward training health professionals about medicine. I am also aware of many medical professionals who are afraid to speak out against these initiatives publicly because they fear retaliation or other negative consequences.

13. Indeed, many Do No Harm members who are medical professionals or students in the medical field would not participate in litigation like this to vindicate their rights if they could not participate anonymously. Those concerns are particularly present in the context of affirmative action. For example, Abigail Fisher—the named plaintiff who challenged affirmative action in *Fisher v. Univ. of Texas*, 570 U.S. 297 (2013), and *Fisher v. Univ. of Texas*, 579 U.S. 365 (2016)—“endured consistent harassment since 2008” “[a]s a direct result of [her] involvement in that case,” *SFFA v. Harvard Coll.*, No. 1:14-cv-14176 (D. Mass. Apr. 29, 2016), ECF 150-4 ¶3. She experienced grotesque “threats” and “insults” from across the country and even suffered professionally. *See id.* ¶¶5, 9-10. According to Fisher, those experiences “often led [her] to second-guess [her] involvement in the case and as an advocate against unlawful affirmative action policies.” *Id.* ¶11.

14. Do No Harm brought this suit to ensure that its members—like Member A—will not face discipline, investigation, or any other negative repercussions, official or social, for vindicating their constitutional rights.

15. I understand that being the director of a national association that is sometimes the named plaintiff in lawsuits comes with risks. But most healthcare professionals, researchers, and students whose rights are being violated are, understandably, unwilling to endure the kind of retaliation that comes with high-profile litigation.

16. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2023

A handwritten signature in black ink that reads "Kristina Rasmussen". The signature is written in a cursive, flowing style.

Kristina Rasmussen
Executive Director of Do No Harm

**UNITED STATES DISTRICT COURT
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Plaintiff,

v.

KENYA L. EDDINGS, in her official capacity
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Defendant.

Case No. 4:23-cv-347-LPR

Declaration of Member A

I, Member A, declare as follows:

1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.

2. I am a member of Do No Harm. I became a member of Do No Harm because I support its mission as well as this lawsuit.

3. I meet all non-racial eligibility requirements set by the Arkansas Minority Health Commission (AMHC). However, I do not meet the racial requirement because I am non-Hispanic white.

4. I am a U.S. citizen.

5. I am also a resident of Arkansas, as defined by the Department of Higher Education.

I was raised in Arkansas and have been a resident of Arkansas for more than 12 months.

6. I am currently enrolled as a full-time student at a public university in Arkansas. I am a sophomore. I expect to continue attending college in Arkansas in Fall 2023, Spring 2024, Fall 2024, and Spring 2025.

7. I am planning to declare nursing as a major in my junior year, which is the earliest I can do so at my school. For now, I am on the pre-nursing track and taking pre-requisites for the

nursing major. Nursing is the major that I've always been drawn to, and I hope to use this degree to help others, including through perhaps doing medical mission work in the future.

8. I would like to apply to the Minority Healthcare Workforce Diversity Scholarship. I am funding my college education with a mix of scholarships, money I earn from a part-time job, and other types of financial aid. Applying to this scholarship would provide me with financial assistance as I pursue my health-related education and career. I am always looking for scholarship opportunities and have applied to various scholarship opportunities during my freshman and sophomore years.

9. I am prepared to write the required short essay in support of my application addressing my notable qualities, knowledge about minority health, and examples of my demonstrated leadership ability. I am aware of and able to write an essay about the great medical need in certain communities. And I strongly believe that everyone should be given great medical care regardless of race. I also have held various leadership positions for various student organizations and for off-campus activities.

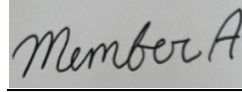
10. I am tobacco-free and would pledge in writing to refrain from the use of tobacco.

11. I am able and ready to apply to the scholarship for the Fall 2023 semester and future semesters if the AMHC stops discriminating against white applicants. But I am currently ineligible to apply to the scholarship because I am white. And I cannot truthfully complete application forms that would require that I confirm that I belong to the listed minority groups. Accordingly, I cannot apply until that condition is removed.

12. I am signing this declaration under a pseudonym because I am a college student, and if my participation in this litigation becomes public, I fear reprisal from other students on campus, my professors, school administrators, future employers, and the public.

13. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2023

A rectangular grey box containing the handwritten text "Member A" in a cursive script.

Member A

**UNITED STATES DISTRICT COURT
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KENYA L. EDDINGS, in her official capacity
as Arkansas Minority Health Commission
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Defendant.

Case No. 4:23-cv-347-LPR

Declaration of Cameron T. Norris

I, Cameron T. Norris, declare as follows:

1. I am over 18, of sound mind, and otherwise competent to sign this declaration.
2. I am an attorney at the law firm Consovoy McCarthy PLLC and counsel for plaintiff

Do No Harm.

3. The following materials attached as exhibits are true and accurate copies of documents and pages from the Arkansas Minority Health Commission's public website and Facebook page that were downloaded as PDF files between April 5, 2023, and April 20, 2023:

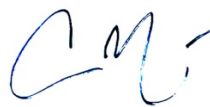
- a. Exhibit A is AMHC's Minority Health Workforce Diversity Scholarship application form, available at <https://perma.cc/B3VG-J8PH>.
- b. Exhibit B is AMHC's Minority Health Workforce Diversity Scholarship Guidelines, available at <https://perma.cc/7GRN-BJLE>.
- c. Exhibit C is a June 22, 2022, scholarship advertisement from AMHC's Facebook page, available at <https://perma.cc/7VRL-CULR>.

4. The following documents attached as exhibits are true and accurate copies of pages from a public website that were downloaded as PDF files between April 20, 2023, and April 25, 2023:

- a. Exhibit D is a February 16, 2023, Department of Health press release from the Department's website, available at <https://perma.cc/NR6R-VBUE>.
- b. Exhibit E is an October 14, 2022, Department of Health press release from the Department's website, available at <https://perma.cc/K6S2-5N9K>.

5. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2023



Cameron T. Norris

Ex. A



Arkansas Department of Health

Arkansas Minority Health Commission
5800 W. 10th Street, Suite 805 • Little Rock, AR 72204 • (501) 686-2720 • Fax: (501) 686-2722

Governor Asa Hutchinson
Renee Mallory RN, BSN, Interim Secretary of Health
Kenya L. Eddings, MPH, CWWS, Director

Arkansas Minority Health Commission Minority Healthcare Workforce Diversity SCHOLARSHIP APPLICATION FORM

Deadline: This application form and all other required documentation must be received by Saturday, December 31, 2022 by 5:00pm(CST).

Email to: Onekia.Freeman@arkansas.gov. Questions? Call (501) 686-2720 (8:00 a.m. – 4:30 p.m. weekdays) or e-mail: onekia.freeman@arkansas.gov.

Website: arminorityhealth.com.

Required fields are indicated by an asterisk (*).

Eligibility: Students must meet these criteria to be eligible. **Please initial.**

1. ____* I confirm that I am a racial minority (African American, Hispanic, Native American/American Indian, Asian American or Marshallese).
2. ____* I am a citizen of the United States or a permanent resident alien (includes Washington, D.C., and Puerto Rico).
3. ____* I am a resident of Arkansas as defined by the Department of Higher Education for a minimum of twelve (12) months.
4. ____* I will be attending a college in Arkansas in the **Spring** semester of **2023**.
5. ____* I am enrolled in a program of study that leads to or is creditable toward a field of health (i.e. medicine, nursing, pharmacy, dental, radiology, allied health, public health, and/or health related professions). These programs include graduate degree programs, baccalaureate degree programs, associate degree programs, qualified certificate programs and nursing school diplomas, which require concurrent college enrollment.
6. ____* I am tobacco-free and must pledge in writing on the application form to refrain from the use of tobacco.

7. ***Name:**

- a. First name*-- Middle name(s) -- Last name*:

- b. If it is different than your formal name, what do you prefer to be called?

8. ***Have you been awarded an AMHC scholarship before?**

- ___ Yes (What Year?: _____) or ___ No

9. ***Home address:** *The AMHC Scholarship Program is restricted to residents of Arkansas.*

*Address: _____

*City: _____ *State: _____ *ZIP: _____

10. ***Primary telephone:** (_____) _____

11. **Secondary telephone:** (_____) _____ **Extension:** _____

12. ***E-mail:** _____

13. **Date of Birth (MM/DD/YYYY):** ____/____/____

14. ***What school do you currently attend?**

*Name: _____

*City: _____ *State: _____ *ZIP: _____

Phone number: (_____) _____

What is your current GPA? _____

15. ***Race/Ethnicity:**

American Indian/Alaska White Asian Hispanic/Latino

African American Marshallese Other: _____

16. **Gender:**

Male Female

17. **Preferred Language:**

English Spanish Other: _____

18. ***Classification in the Spring 2023 semester:** _____

[freshman, sophomore, junior, senior, graduate, terminal degree (pharmacy, medicine, etc.), postgraduate]

19. ***What degree(s) are you pursuing?**

20. ***What profession or field of employment do you wish to enter with your college degree?**

21. ***Anticipated year of college graduation:** _____

22. **List any other postsecondary institutions you have attended:**

22a. Name: _____

City: _____ State: _____ Years: _____

22b. Name: _____

City: _____ State: _____ Years: _____

22c. Name: _____

City: _____ State: _____ Years: _____

23. * Essay:

Please compose an essay that addresses each of the following: your most notable qualities, your knowledge about minority health, and examples of your demonstrated leadership ability.

Attach your essay to this form. The essay is limited to no more than 1,000 words on two printed pages (approximately 6,000 characters). Recommendation: **Carefully proof your essay and know that well-written, short essays are admired.**

24. *Certification Statement:

I pledge to be tobacco free. "Tobacco" includes any product containing, made, or derived from tobacco that is intended for human consumption, whether chewed, smoked, absorbed, dissolved, inhaled, snorted, sniffed, or ingested by any other means or any component, part, or accessory of a tobacco product to include but not limited to: any lighted or unlighted cigarette, cigar, pipe, and any other smoking product, and spit tobacco, also known as smokeless, dip, chew, snus, and snuff, in any form including, "e-cigarette" and Electronic Nicotine Delivery Systems (ENDs). This pledge includes alcohol for applicants less than twenty-one years of age.

By signing my name below, I confirm that all the information provided above and in the accompanying documents is true and correct to the best of my knowledge.

Signed: _____ Date: _____

Ex. B

MINORITY HEALTH WORKFORCE DIVERSITY SCHOLARSHIP

Guidelines

The Minority Health Workforce Diversity Scholarship is an award offered by the Arkansas Minority Health Commission to college students of a minority race who plan to pursue careers in the field of health. The goal of the scholarship is to help increase diversity in the state's healthcare workforce, which could have positive effects on both the health of minority populations and the quality of care in Arkansas.

Scholarship Eligibility Criteria

An applicant must meet the following requirements to be eligible to receive the Minority Health Workforce Diversity Scholarship:

- Must be a U.S. citizen or permanent resident alien
- Must be a bona fide resident of the state as defined by the Department of Higher Education for a minimum of 12 months immediately before the date on which the student applies
- Must be enrolled in a program of study that leads to or is creditable towards a field of health (i.e. medicine, nursing, pharmacy, dental, radiology, allied health, public health and/or health related professions)
- Must certify they are tobacco-free and must pledge in writing on the application form to refrain from the use of tobacco
- Must represent a racial minority population underrepresented in health workforce (i.e. Black American, Hispanic American, Native American/American Indian, Asian American and Marshallese)

Scholarship Guidelines

Before completing the sponsorship application, please review the sponsorship guidelines below.

MINORITY HEALTH WORKFORCE DIVERSITY SCHOLARSHIP

RULES AND REGULATIONS

RULE 1 – ORGANIZATION AND STRUCTURE

I. The Arkansas Minority Health Commission (AMHC) shall administer the Minority Healthcare Workforce Diversity Scholarship. All formal communications shall be addressed to or signed by the Director of the Arkansas Minority Health Commission. II. The Director of the Arkansas Minority Health Commission has the final responsibility for selecting scholarship recipients pursuant to mission, vision and goals of the Commission.

RULE 2 – SCHOLARSHIP ELIGIBILITY CRITERIA

Eligibility Criteria: An applicant must meet the following requirements to be eligible to receive the Minority Health Workforce Diversity Scholarship:

A.The applicant must be a citizen of the United States or a permanent resident alien.B.The applicant shall be a bona fide resident of the state as defined by the Department of Higher Education for a minimum of twelve (12) months immediately before the date on which the student applies.C.The applicant shall be enrolled in an approved institution of higher education as a full-time or part-time first-time student, as defined by the Department of Higher Education.D.The applicant must be enrolled in a program of study that leads to or is creditable towards a field of health (i.e. medicine, nursing, pharmacy, dental, radiology, allied health, public health, and/or health related professions). These programs include graduate degree programs, baccalaureate degree programs, associate degree programs, qualified certificate programs and nursing school diplomas, which require concurrent college enrollment.E.Applicants must certify that they are tobacco-free and must pledge in writing on the application form to refrain from the use of tobacco. "Tobacco" includes any product containing, made, or derived from tobacco that is intended for human consumptions, whether chewed, smoked, absorbed, dissolved, inhaled, snorted, sniffed, or ingested by any other means or any component, part, or accessory of a tobacco product to include but not limited to: any lighted or unlighted cigarette, cigar, pipe, and any other smoking product, and spit tobacco, also known as smokeless, dip, chew, snus, and snuff, in any form including, "e-cigarette" and Electronic Nicotine Delivery Systems (ENDs). This pledge includes alcohol for applicants less than twenty-one years of age.

F.Applicants must represent a racial minority population underrepresented in health workforce. Minority populations as defined in Act 912 of 1991 include: Black American, Hispanic American, Native American/American Indian, and Asian American. The Arkansas Minority Health Commission also includes Marshallese as an eligible racial minority.

RULE 3 – APPLICATION PROCESS

I.ApplicationStudents must submit an application for the Minority Health Workforce Diversity Scholarship to the Arkansas Minority Health Commission. The Arkansas Minority Health Commission will provide application forms to any individual upon request. The applicant must complete the Minority Health Workforce Diversity Scholarship application and essay to be considered for the scholarship.**II.Submission of Application and Application Deadline**Any interested minority student planning to enroll in an eligible public or private college or university in Arkansas may apply.

The Arkansas Minority Health Commission shall establish the deadline for receipt of applications each year. The deadline date shall be clearly printed on the application. All applications and supporting documentation must be received by the Arkansas Minority Health Commission by the established deadline date in order to be considered. It is the responsibility of the individual applicant to ensure that the application is received by the Arkansas Minority Health Commission by the deadline date.

III.Amount of ScholarshipThe amount of the annual scholarship awarded to each recipient shall be as follows:A.A full-time recipient shall be awarded in the amount of one thousand dollars (\$1,000) per academic year;B.A part-time recipient shall be awarded in the amount of five hundred dollars (\$500) per academic year.

RULE 4 - AWARD PROCESS

Arkansas institutions of higher education will award the Minority Health Workforce Diversity Scholarship to eligible students based on the criteria below.

A. Awards will be made based on minority students enrolled in a degree of study that leads to or is creditable towards a field of health (i.e. medicine, nursing, pharmacy, dental, radiology, allied health, public health, and/or health related professions).

B. Applications will be reviewed for completeness and to determine whether the applicant meets all the required eligibility requirements. Applicants will be notified regarding receipt of all required documentation of the status of their application.

C. The Arkansas Minority Health Commission shall notify the students of their status as eligible. The notice provides instructions for receiving an award and defines the recipient's responsibilities.

D. The Arkansas Minority Health Commission shall notify applicants who are determined to be ineligible and provide the reason for ineligibility.

RULE 5 – SCHOLARSHIP PAYMENT POLICIES

Payment of Scholarship

The Arkansas Minority Health Commission shall disburse scholarship funds to the approved applicants. The Arkansas Minority Health Commission shall send funds to the applicant via electronic funds transfer or state warrant, after verification of full-time or part-time enrollment in a state institution. The scholarship fund payment will correspond to academic terms or equivalent time periods at the eligible institution not to include summer terms. Students who withdraw from school may owe a refund to the program.

Minority Health Workforce Diversity Scholarship is not automatically renewable.

Students must apply each year and awards will be made based on the amount of funds available.

RULE 6 - PROGRAM DEFINITIONS

The following definitions are used in the Minority Healthcare Workforce Diversity Scholarship:

A. APPROVED INSTITUTION

A state-supported two-year or four-year college or university or technical institute located in the State of Arkansas that is accredited by the North Central Association, Commission on Higher Education, or has achieved candidacy status, and does not discriminate against applicants, or employees on the basis of race, color, religion, sex, age, handicap, or national origin, consistent with the provisions of applicable state and federal laws.

Arkansas Minority Health Commission Scholarship www.arminorityhealth.com

B. ACADEMIC YEAR

Fall semester and spring semester only.

C. CITIZEN

A person who is a U.S. citizen or a permanent resident alien. If the recipient is not a U.S. citizen, but a permanent resident alien, the recipient must attach a copy of the permanent resident alien card to the application.

D. ELIGIBLE APPLICANT

Any minority applicant who is enrolled in a program of study that leads to or is creditable toward a field of health (i.e. medicine, nursing, pharmacy, dental, radiology, allied health, public health, and/or health related professions).

E. MINORITY

Act 912 of 1991 defines minority as Black Americans, Hispanic Americans, Asian American and American Indian/Native American. The Arkansas Minority Health Commission also recognizes the Marshallese population as minority.

F. FULL-TIME STUDENT

Twelve (12) college credit hours or its equivalent per semester for the first semester and fifteen (15) credit hours or the equivalent thereafter.

G. PART-TIME STUDENT

Six (6) college credit hours or its equivalent per semester for students.

H. QUALIFIED CERTIFICATE PROGRAM

A program that is:

A. Offered by an approved institution of higher education;

B. Shorter in duration than an associate degree for which credit hours awarded are creditable towards an associate degree; and

C. Recognized by the United States Department of Education for financial aid purposes.

I. TUITION

Charges levied for attendance at an eligible institution of higher education including mandatory fees charged to all full-time or part-time students by the approved institution.

Ex. C



Arkansas Minority Health Commission

June 22, 2022 · 🌐

Deadline to apply for the Minority Workforce Diversity Scholarship is June 24th, 2022, by 5:00p.m., CST. Applications will not be accepted or reviewed after this date & time.

Full and part-time college students can apply for our Minority Health Workforce Diversity Scholarship!!! If you desire to be a nurse, physician, pharmacist, dentist, nutritionist or anything in the field of health, this scholarship is for you!

Click the link below to apply:

<https://www.arminorityhealth...> See more

👍 4

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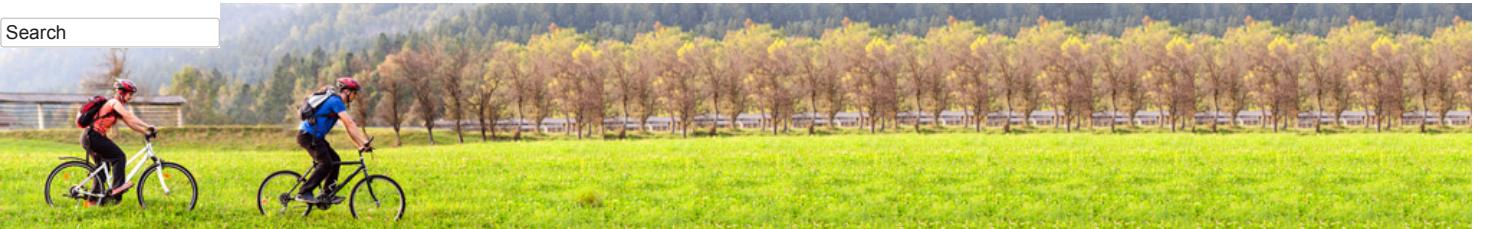
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Posted: 02/16/23

AR Minority Health Comm. Announces Recipients of Minority Health Workforce Diversity Scholarship

Twenty-nine students receive awards ranging from \$500 to \$1,000.

LITTLE ROCK, Ark. – The Arkansas Minority Health Commission has awarded \$27,500 in scholarships to 29 minority students pursuing careers in health care and public health for the Spring 2023 school semester.

Part-time students receiving scholarships are:

- Christy Vick-Perry, Little Rock, University of Arkansas – Pulaski Technical College (UA-PTC)
- Aarionna Richardson, Altheimer, Southeast Arkansas College(SEARK)
- Romonda Weston, Pine Bluff, SEARK

Full-time students receiving scholarships are:

- Amie Brint, Little Rock, University of Arkansas for Medical Sciences (UAMS)
- Amond Baker, Little Rock, UAMS
- Esmeralda Almaras-Mora, Rogers, UAMS
- Martin Morales, Little Rock, University of Arkansas at Little Rock (UA Little Rock)
- Quinyatta Mumford, Little Rock, UA Little Rock
- FaSeeia Preston, Pine Bluff, UA Little Rock
- Pricila Tinajero, Wilmar, University of Arkansas at Monticello
- Jaedyn Lee, Mabelvale, Arkansas State University (A-State)
- Onika Gibson-Lovett, Pine Bluff, A-State
- Mary Allen-Rodger, Little Rock, UA-PTC
- Paige Thomas, Benton, University of Arkansas (U of A)
- Zhipping Xu, Fayetteville, U of A
- Ashley Allen, Crossett, University of Arkansas Pine Bluff (UAPB)
- Shelbi Barnes, Bentonville, UAPB
- Ashanti Cooper, Altheimer, Baptist Health College Little Rock (BHCLR)
- Wendy Magbanua, Benton, BHCLR
- Kennedi Mayweather, Little Rock, BHCLR
- Amity Scott, Maumelle, BHCLR
- Jermayia Brown, England, University of Central Arkansas (UCA)
- Jamauria Byrd, Pine Bluff, UCA
- Sabrina Gonzales, Blytheville, UCA
- Kalyndria McGown, Pine Bluff, UCA
- Lorian Walls, Benton, UCA
- Danyel White, Conway, UCA
- Darrick Rose Jr., Benton, Henderson State University
- Lakendra Williams, Pine Bluff, Jefferson Regional Medical Center School of Nursing

The Arkansas Minority Health Commission and its Board are proud of these students, said Kenya Eddings, Arkansas Minority Health Commission Executive Director. “Their choice of a career of service through health care or public health will help close the minority workforce diversity gap.”

Minority students enrolled in a program of study that leads to or is creditable towards, a field in health can apply for the scholarship. Additional information about the scholarship can be found at www.arminorityhealth.com.

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AR MINORITY HEALTH COMM. ANNOUNCES RECIPIENTS OF MINORITY HEALTH WORKFORCE DIVERSITY SCHOLARSHI

10/14/2022 - 10/14/2022

Location

LITTLE ROCK, Ark. – The Arkansas Minority Health Commission has awarded \$26,000 in scholarships to 28 minority students pursuing careers in health care and public health for the Fall 2022 school semester.

Part-time students receiving scholarships are: Sir-Jason Monroe, Valissia Batemon, both of Conway, Taylor Thompson and Vivian White, both of Little Rock.

Full-time students receiving scholarships are: Ciristen Neal, of Alexander, Alma Navarrete, of Benton, Estefany Soto, Kathryn Armstrong, both of Conway, Nydia Hernandez, of Hamburg, Danna Chaney, of Heber Springs, Zharia Harris, of Hensley, Damaiya Byrd, of Hot Springs, Kierra Wright, of Jonesboro, Gabriel Wilber, Amber Hill, Nabeel Alwan, Breann Hansberry, Skylar West, Brittany Taylor, Jonathan Park, Andrea Daniels, all of Little Rock, Devan Mishra, India Hayes, both of Maumelle, Alexis Larkins, of Pine Bluff, Lizbeth Cenobio, of Springdale, Ashanti Turner, of Stephens, Rashad Thrower, of Texarkana, and Latoya Handy, of West Memphis.

“There is an ever-increasing gap in minority representation in the health care workforce,” said Kenya Eddings, Arkansas Minority Health Commission Executive Director. “We are proud of these students who have chosen to pursue a career of service through health care and public health and excited to be able to help them by providing scholarships.”

The Minority Health Workforce Diversity Scholarships are awarded twice per year. Minority students enrolled in a program of study that leads to, or is creditable towards a field in health, can apply for the scholarship. Additional information about the scholarship can be found at arminorityhealth.com.

About Arkansas Minority Health Commission

The mission of the Arkansas Minority Health Commission (AMHC) is to assure all minority Arkansans equitable access to preventive health care and to seek ways to promote health and prevent diseases and conditions that are prevalent among minority populations.

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