



January 31, 2025

Dean Bruce T. Liang
University of Connecticut School of Medicine
263 Farmington Avenue
Farmington, Connecticut 06030-3946

Sent via U.S. Mail and Electronic Mail (bliang@uchc.edu)

Dear Dean Liang:

The Foundation for Individual Rights and Expression (FIRE), a nonpartisan nonprofit dedicated to defending freedom of speech,¹ is concerned that incoming University of Connecticut School of Medicine students are required to affirm contested political viewpoints² in the school's Hippocratic Oath, violating their First Amendment right against compelled speech.

On August 23, during the annual White Coat Ceremony for incoming medical students, Assistant Dean for Admissions and Student Affairs Thomas Regan, M.D. administered the medical school's version of the Hippocratic Oath to the class of 2028. It reads, in relevant part:³

I will strive to promote health equity.

I will actively support policies that promote social justice and specifically work to dismantle policies that perpetuate inequities, exclusion, discrimination and racism.

FIRE called the UConn School of Medicine Admissions Office to clarify whether the oath, including these additions, is mandatory for students participating in the ceremony. A staff member confirmed that this oath is required for all incoming students.⁴ We have also emailed

¹ For more than 20 years, FIRE has defended freedom of expression, conscience, and other individual rights on America's college campuses. You can learn more about our mission and activities at thefire.org.

² The following is our understanding of the pertinent facts, which is based on public information. We appreciate that you may have additional information and invite you to share it with us.

³ *Do No Harm*, "Emails Reveal Political Rationale Behind UConn's Woke Revision of Hippocratic Oath," (Oct. 21, 2024) <https://donoharmmedicine.org/2024/10/21/uconn-hippocratic-oath-dei-revision/>.

⁴ Phone conversation between Ross Marchand, FIRE Program Officer, and staff member, UConn School of Medicine Admissions Office (Jan. 7, 2025, 10:57 A.M.).

the admissions office to confirm the mandatory nature of the oath but have yet to receive a written response.⁵

While UConn may encourage students to adopt the views contained in the oath, the First Amendment bars the university from requiring them to do so.⁶ The First Amendment protects not only the right to speak but the right to *refrain* from speaking.⁷ As the Supreme Court has notably held, public institutions may not compel individuals to “declare a belief [and] ... to utter what is not in [their] mind.”⁸ Requiring new students to pledge their loyalty to a particular ideology violates students’ expressive rights, is inconsistent with the role of the university as a bastion of free inquiry, and cannot lawfully be enforced at a public institution. UConn can require students to adhere to established medical standards, but this authority cannot be abused to demand allegiance to a prescribed set of political views—even ones that many students may hold.⁹ Specifically, the school may not compel students to pledge to support or promote concepts such as “social justice” and “equity,” notions that have long been the subject of intense political polarization and debate.

To illustrate our concern by analogy, we trust UConn would readily recognize the problem with requiring incoming medical students to pledge to oppose “socialized medicine,” or policies mandating COVID-19 vaccination schedules or promoting gender-affirming care. Just as with UConn’s current iteration of the Hippocratic Oath, prospective or incoming students with personal or professional beliefs and commitments that differ from those referenced in the oath would be at a disadvantage for professing the “wrong” belief.

Moreover, many words and phrases in UConn’s current Hippocratic Oath are impermissibly vague and lack clear definitions. All government regulations must “give a person of ordinary intelligence a reasonable opportunity to know what is prohibited, so that [they] may act accordingly,”¹⁰ and that rule applies “with particular force” if a regulation “affects First Amendment rights.”¹¹ Requirements that students pledge to promote “social justice” and “equity” and commit to opposing “policies that perpetuate inequities, exclusion, discrimination and racism” lack clear parameters for compliance. The meanings of these words

⁵ Email from Ross Marchand to UConn School of Medicine Admissions Office (Jan. 8, 2025, 1:59 P.M.).

⁶ It has long been settled law that the First Amendment is binding on public universities like UConn. *Healy v. James*, 408 U.S. 169, 180 (1972) (“[T]he precedents of this Court leave no room for the view that, because of the acknowledged need for order, First Amendment protections should apply with less force on college campuses than in the community at large. Quite to the contrary, ‘the vigilant protection of constitutional freedoms is nowhere more vital than in the community of American schools.’”) (internal citation omitted). Accordingly, the decisions and actions of a public university—including the pursuit of disciplinary sanctions, and maintenance of policies implicating student and faculty expression—must be consistent with the First Amendment. *Papish v. Bd. of Curators of the Univ. of Mo.*, 410 U.S. 667, 667–68 (1973); *Dambrot v. Central Mich. Univ.*, 55 F.3d 1177 (6th Cir. 1995).

⁷ See *Wooley v. Maynard*, 430 U.S. 705, 714 (1977) (“[T]he right of freedom of thought protected by the First Amendment against state action includes both the right to speak freely and the right to refrain from speaking at all.”).

⁸ *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 631, 634 (1943).

⁹ See *Wooley*, 430 U.S. at 714 (“[W]here the State’s interest is to disseminate an ideology, no matter how acceptable to some, such interest cannot outweigh an individual’s First Amendment right to avoid becoming the courier for such message.”).

¹⁰ *Grayned v. City of Rockford*, 408 U.S. 104, 108–09 (1972).

¹¹ *UWM Post, Inc. v. Bd. of Regents of Univ. of Wis. Sys.*, 774 F. Supp. 1163, 1178 (E.D. Wis. 1991).

and phrases are wholly undefined and in the eyes of the beholder, inviting uneven application by administrators seeking to enforce the oath with their own, preconceived definitions of terms such as “equity.”

Indeed, the latter mandate could be read so broadly as to include (for example) advocating against any policy that does *not* abolish private health insurance, or even direct private payments to doctors. Even short of that extreme, students reciting the oath may reasonably construe it to prevent them from supporting political candidates who do not hold what UConn deems to be the “correct” views on health policy—a clear violation of students’ First Amendment rights. Students should not have to constantly ask themselves whether political advocacy or even a dinner table conversation with loved ones may violate a sacred oath they took to become a doctor.

FIRE calls on UConn to make clear that students may refrain from reciting all or part of the oath without any threat of penalty and will not have to affirm any political viewpoints as a condition of their education at the school.

We request receipt of a response to this letter no later than the close of business on February 14, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross Marchand", written over a horizontal line.

Ross Marchand
Program Officer, Policy Reform and Campus Rights Advocacy