



# *Bias vs. Diversity: The Harvard Admissions Case*

The Legal Basics and Practical Implications for High Schools and Colleges

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# This Presentation's Objectives



Understand the legal basics to inform  
our policy and procedure reviews



Walk away with practical considerations  
in light of the Court's opinion

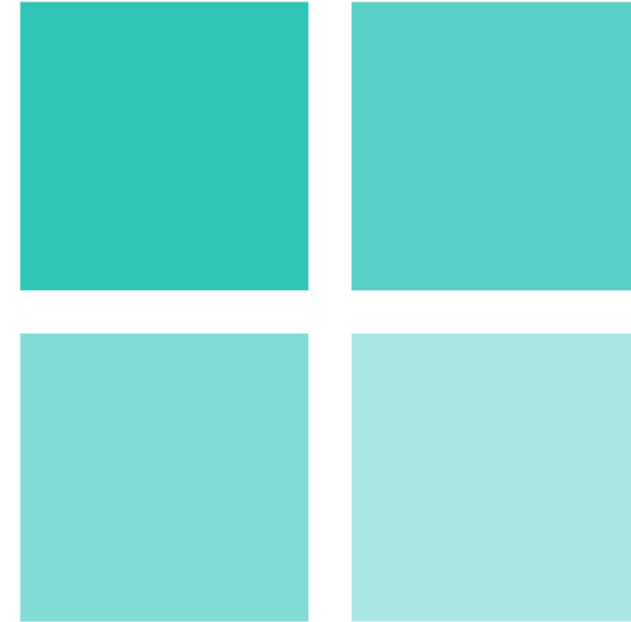


# This Presentation Is Not Legal Advice

It is an informational session to inform your policy thinking.

# Dr. Stephen Himes

- J.D. / Ed.D. with an emphasis in Civil Rights in Education Law
- Member of the national Education Law Association
- Twenty years of high school teaching experience in public and private schools—including experience advising on college admissions and writing for the college application
- Currently Co-Founder and Head of Advising for a firm that develops programming and professional development on college admissions for schools




**Storyboards**  
COLLEGE ADMISSION PORTFOLIOS

# What Did the Court Do in *SFFA v. Harvard* and *U. of North Carolina*

- In a 6-3 decision written by Chief Justice John Roberts, the Supreme Court issued a sweeping decision on the college admissions process.
- This decision presents several unanswerable questions and invites future litigation.
- But, incidentally, also gives a roadmap for how to create a great holistic college application

# Background: What Is “Affirmative Action”?

Reconstruction Roots: General Sherman’s Special Field Order No. 15  
“40 Acres and a Mule” (1865)



First Appears in New Deal Legislation: National Labor Relations  
Act Right to Unionize Without Fear of Discrimination (1935)



President Truman’s Desegregation of the Military (1948)



President Johnson’s Great Society and The Civil Rights Act (1964)



President Obama’s Amendments to No Child Left Behind (2010)

**Conservative Legal Theory  
Sees Affirmative Action as a  
Betrayal of Reconstruction:  
“Color-Blind” Constitution**



**“The way to stop discriminating on the basis of race is to stop discriminating on the basis of race.”**

***Parents Involved v. Seattle Schools (2007)***

*Chief Justice John Roberts*

**“We did not fight a Civil War about oboe players.”**

**Oral Argument in *SFFA v. Harvard* (2023)**

*Chief Justice John Roberts*

**“Eliminating racial discrimination mean eliminating all of it.”**

**Majority Opinion, *SFFA v. Harvard* (2023)**

*Chief Justice John Roberts*

# Liberal Legal Theory Sees Affirmative Action as Realizing Equal Protection

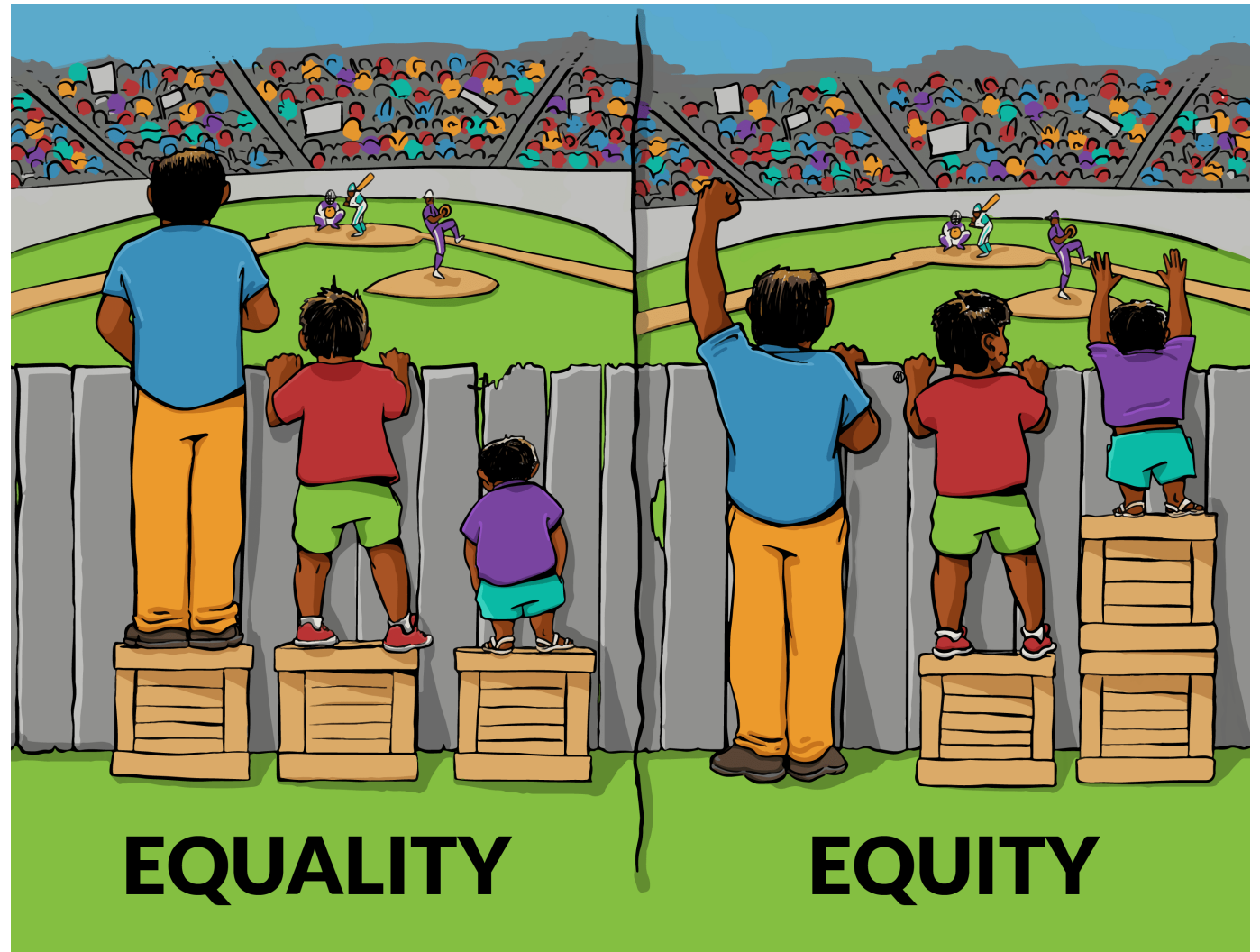
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Conservative Justices:

Equality = “Color Blind Constitution”

Liberal Justices:

Equity = “Living Constitution”





# Relevant Precedent: Justice Powell's Compromise California v. Bakke (1978)

Racial Diversity is a "Compelling Interest" in College Admissions

But, "Quotas" Absolutely Violate Equal Protection

So, Affirmative Action OK If "Narrowly Tailored" in a Holistic Review



Relevant Precedent:  
*Grutter v. Bollinger* (2003)

Diversity in Higher Education Still  
a "Compelling Interest"

Michigan Law School's "Holistic Review" (including race as one of many factors) **IS** "Narrowly Tailored."

UM Undergrad's "points for race" **IS NOT** Narrowly Tailored (*Gratz v. Bollinger*, heard with *Grutter*).



## Justice O'Connor's Opinion Is Unprecedented

- Contains a possible 25 year “sunset” provision
- Greatly influenced by briefs from the Military and Corporate worlds

Similar Briefs  
Were Submitted  
in *SFFA*. Justice  
Sotomayor Cites  
Them in Dissent

Examples of other industries and professions that benefit from race-conscious college admissions abound. American businesses emphasize that a diverse workforce improves business performance, better serves a diverse consumer marketplace, and strengthens the overall American economy. Brief for Major American Business Enterprises as *Amici Curiae* 5–27. A diverse pipeline of college graduates also improves research by reducing bias and increasing group collaboration. Brief for Individual Scientists as

Chief Justice  
Roberts Carves  
Out a Military  
Academy  
Exception in a  
Footnote

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<sup>4</sup>The United States as *amicus curiae* contends that race-based admissions programs further compelling interests at our Nation's military academies. No military academy is a party to these cases, however, and none of the courts below addressed the propriety of race-based admissions systems in that context. This opinion also does not address the issue, in light of the potentially distinct interests that military academies may present.

# What Did The Court Decide?

- It didn't *explicitly* overturn *Bakke* and *Grutter* by holding that racial diversity in college admissions isn't a "compelling interest." \*
- But created a "Precedent Trap" so that no college could ever overcome strict scrutiny in using racial classifications.



\*Justice Thomas wrote in concurrence to say, yes, actually, we did overrule *Grutter*.

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## The Precedent Trap: Compelling Interest

There is a compelling interest  
in diversity...

But, you have to *specifically*  
define it for the Court to  
measure it and know when  
goals have been reached.

Otherwise, it's "not sufficiently  
coherent" for strict scrutiny.

Although these are commendable goals, they are **not sufficiently coherent** for purposes of strict scrutiny. At the outset, it is unclear **how courts are supposed to measure any** of these goals. How is a court to know whether leaders have been adequately "train[ed]"; whether the exchange of ideas is "robust"; or whether "new knowledge" is being developed? *Ibid.*; 980 F. 3d, at 173–174. Even if these goals could somehow be measured, moreover, **how is a court to know when they have been reached**, and when the perilous remedy of racial preferences may cease? There is no particular point

Chief Justice Roberts, Opinion of the Court, pg 23

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## The Precedent Trap: Compelling Interest

“Check Box” racial categories are overbroad and reductive...

So, you cannot “meaningfully connect” these categories to outcomes and goals.

Second, respondents’ admissions programs fail to articulate a meaningful connection between the means they employ and the goals they pursue. To achieve the educational benefits of diversity, UNC works to avoid the underrepresentation of minority groups, 567 F. Supp. 3d, at 591–592, and n. 7, while Harvard likewise “guard[s] against inadvertent drop-offs in representation” of certain minority groups from year to year, Brief for Respondent in No. 20–1199, at 16. To accomplish both of those goals, in turn, the universities measure the racial composition of their classes using the following categories: (1) Asian; (2) Native Hawaiian or Pacific Islander; (3) Hispanic; (4) White; (5) African-American; and (6) Native American. See, e.g., 397

Chief Justice Roberts, Opinion of the Court, pg. 24

## The Problem:

### By Design, Holistic Admission Defies Specific Definition and Concrete Measures

- Colleges *can't* mechanically apply metrics, so it's hard to pinpoint characteristics that make the difference in admissions decisions.
- But, the Court says you *must* directly tie use of racial classifications to the undefinable goal of the “benefits of diversity.”
- Court explicitly says colleges are owed no deference: You can't say “Trust Us” on diversity.

The universities' main response to these criticisms is, essentially, “trust us.” None of the questions recited above need answering, they say, because universities are “owed deference” when using race to benefit some applicants but not others. Brief for University Respondents in No. 21–707,

Chief Justice Roberts, Opinion of the Court, pg. 26

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## So, Somehow, You Have to Have “Concrete Measures” Without Also Having Quotas

“Concrete Measures” let the Court know you’ve achieved diversity in Holistic Review

But “Quotas” are unconstitutional, so your measures can’t be *too concrete*, or they’ll violate *Bakke*!

firmly in mind.” *Grutter*, 539 U. S., at 324, 335. Thus, the majority’s holding puts schools in an untenable position. It creates a legal framework where race-conscious plans *must* be measured with precision but also *must not* be measured with precision. That holding is not meant to infuse clarity into the strict scrutiny framework; it is designed to render strict scrutiny “fatal in fact.” *Id.*, at 326 (quoting *Adarand*

\*Justice Sotomayor, pg. 51 of her Dissent

## Now You're Stuck!

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Any consideration of race creates a number that gets cast in a “Zero Sum” game...

That creates definable groups of students who do not get a “tip” in the holistic review!

51. But on Harvard’s logic, while it gives preferences to applicants with high grades and test scores, “that does not mean it is a ‘negative’” to be a student with lower grades and lower test scores. *Ibid.* This understanding of the admissions process is hard to take seriously. College admissions are zero-sum. A benefit provided to some applicants but not to others necessarily advantages the former group at the expense of the latter.

Chief Justice Roberts, Opinion of the Court, pg. 27

## Moreover, Racial Classifications are Based on Stereotypes That Discriminate Against Everyone

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The Court interprets the rationale for racial “groups” is that they “shorthand” specific viewpoints, which is an offensive stereotype.

And, race is used as a \*negative\* against students \*not\* in the “preferred” group.

That’s how the system creates discrimination against Whites and Asian-Americans, as well as URM.

Yet by accepting race-based admissions programs in which some students may obtain preferences on the basis of race alone, respondents’ programs tolerate the very thing that *Grutter* foreswore: **stereotyping**. The point of respondents’ admissions programs is that there is an inherent benefit in race *qua* race—in race for race’s sake. Respondents admit as much. **Harvard’s admissions process rests on the pernicious stereotype that “a black student can usually bring something that a white person cannot offer.”** *Bakke*,

Chief Justice Roberts, Opinion of the Court, pg. 29

## Inevitably, The “Success” of the Program is Measured by “Quota-Like” Racial Balancing Numbers Based on Stereotypes

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If you pinpoint a specific number to show how you’ve minimized the impact of racial of classifications...

Now you’ve pointed directly to a concrete number of students *being discriminated against on the basis of their race.*

Share of Students Admitted to Harvard by Race			
	African-American Share of Class	Hispanic Share of Class	Asian-American Share of Class
Class of 2009	11%	8%	18%
Class of 2010	10%	10%	18%
Class of 2011	10%	10%	19%
Class of 2012	10%	9%	19%
Class of 2013	10%	11%	17%
Class of 2014	11%	9%	20%
Class of 2015	12%	11%	19%
Class of 2016	10%	9%	20%
Class of 2017	11%	10%	20%
Class of 2018	12%	12%	19%

Chief Justice Roberts, Opinion of the Court, pg. 31



# The Final Step Into The Precedent Trap:

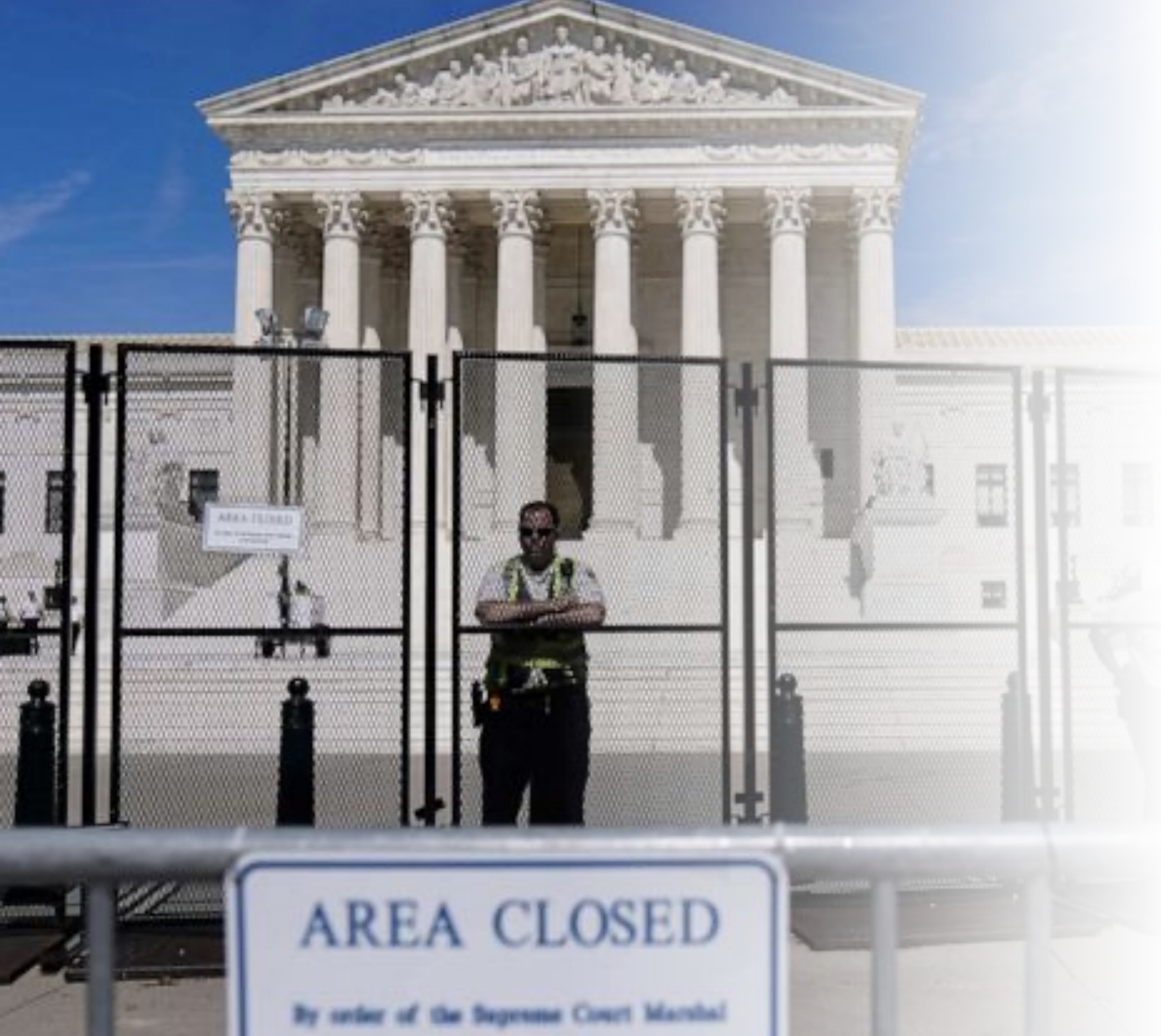
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- Narrow Tailoring requires a definable end point
- Holistic admissions and diversity policies, by their nature, are always being reviewed! That's Best Practice!
- “We review our policies every year in light of ongoing discussions about what diversity means in our context, rigorously assessed against our admissions decisions for fairness.”
- **THAT IS UNCONSTITUTIONAL!**

# Bottom Lines

- The Court detonates *Grutter's* 25-year “self-destruct mechanism” to end affirmative action without saying that diversity isn’t a compelling interest. It is a “commendable goal,” but not “coherent” enough for Court review.
- Interprets racial classifications *in and of themselves* to be a form of “separate but equal,” enshrining the “Color Blind Constitution” as consistent with the Equal Protection Clause and *Brown's* overturning of *Plessy v. Ferguson*.
- Leaves space for discussion of race in applications—under very specific conditions that mirror what a great holistic application looks like.





There's Much More to the Case Buried in the Footnotes, Studies Conducted for Briefs, Trial Court Findings of Fact, and Subsequent Research

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# Practice Points for High Schools



Educate Board, Administrators,  
Parents



Professional Development for  
Faculty and Counselors



Practical Guidance for Students

# #1

## Guide Students on Using Their Résumé And Honors & Activities Lists to Tell Their Story

At the same time, as all parties agree, nothing in this opinion should be construed as prohibiting universities from considering an applicant's discussion of how race affected his or her life, be it through discrimination, inspiration, or otherwise. See, e.g., 4 App. in No. 21-707, at 1725-1726, 1741; Tr. of Oral Arg. in No. 20-1199, at 10. But,

# The Court Virtually Strikes “Check Box” Racial Categories

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Second, respondents’ admissions programs fail to articulate a meaningful connection between the means they employ and the goals they pursue. To achieve the educational benefits of diversity, respondents measure the racial composition of their classes using racial categories

that are plainly overbroad (expressing, for example, no concern whether *South Asian* or *East Asian* students are adequately represented as “Asian”); arbitrary or undefined (the use of the category “Hispanic”); or underinclusive (no category at all for Middle Eastern stu-

But The Chief Justice Leaves the Door Open for Discussions of Racial Identity *THROUGH* Life Experiences

At the same time, as all parties agree, nothing in this opinion should be construed as prohibiting universities from considering an applicant's discussion of how race affected his or her life, be it through discrimination, inspiration, or otherwise. See, e.g., 4 App. in No. 21-707, at 1725-1726, 1741; Tr. of Oral Arg. in No. 20-1199, at 10. **But,**

Recent Research  
Reveals How the  
Activities and  
Honors List on the  
Common App  
Affects Holistic  
Admissions

## Inequality Beyond Standardized Tests: Trends in Extracurricular Activity Reporting in College Applications Across Race and Class

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Common Application,  
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**Nancy Wong**  
University of Maryland,  
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**Stephanie Breen**  
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**Dominique Baker**  
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**OiYan Poon**  
University of Maryland,  
College Park

Inequality related to standardized tests in college admissions has long been a subject of discussion; less is known about inequality in non-standardized components of the college application. We analyzed extracurricular activity descriptions in 5,967,920 applications submitted through the Common Application platform. Using human-crafted keyword dictionaries combined with text-as-data (natural language processing) methods, we found that White, Asian American, high-SES, and private school students reported substantially more activities, more activities with top-level leadership roles, and more activities with distinctive accomplishments (e.g., honors, awards). Black, Latinx, Indigenous, and low-income students reported a similar proportion of activities with top-level leadership positions as other groups, although the absolute number was lower. Gaps also lessened for honors/awards when examining proportions, versus absolute number. Disparities decreased further when accounting for other applicant demographics, school fixed effects, and standardized test scores. However, salient differences related to race and class remain. Findings do not support a return to required standardized testing, nor do they necessarily support ending consideration of activities in admissions. We discuss reducing the number of activities that students report and increasing training for admissions staff as measures to strengthen holistic review.

They Say: It's  
Not Quality, But  
Quantity. So,  
Limit the  
Number of  
Entries

The disparity in reported extracurriculars doesn't mean students from marginalized backgrounds aren't holding leadership positions, Park said.

Across socioeconomic background and race and ethnicity, students largely reported top-level leadership roles at equal rates, researchers found.

The difference comes from the number of activities listed. Students from underrepresented backgrounds reported fewer activities than their counterparts.

"Groups that have traditionally had some advantage in the process tend to have a broader opportunity to try more activities," Park said.

Each Common App user listed an average of seven activities, according to the paper. To help level the playing field, researchers recommend colleges limit the number of activities a prospective student can list to four or five.

# But, Under the Court's Guidance, Colleges are Likely Going to Want Students To Tell More Of *Their* Story Through *Their* Experiences!



Park also advocated for colleges to value the day-to-day work that many underrepresented students do outside of traditional activities.

“Some colleges are trying to encourage students to use the extracurricular field on an application to report activities like caregiving or being your family’s interpreter,” Park said. “Did you take care of your siblings? Did you work 20 hours all through high school? That’s huge.”

## What you can do

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- Dedicate more guidance on creating a personal story through the Activities and Honors Lists that show direct connection to academic and campus life contribution.
- Help them develop more “narrative” résumés that speak directly to college programming.
- Review your school’s offerings of clubs, affinity groups, mentorship programs, etc. to identify gaps in offerings for diverse students.



# #2

## Recognize that the College Essay Might Be The Most Emotionally Difficult Thing They've Ever Written

teenVOGUE

STYLE POLITICS CULTURE IDENTITY VIDEO SUMMIT SHOPPING

Politics

### Foster Youth and College: The Admissions Process Can Be Alienating and Overwhelming

*Unequal is a series about threats to affirmative action and the endurance of school segregation in the US.*

BY EMI NIETFELD

FEBRUARY 23, 2023

During oral arguments for the pending Supreme Court cases on affirmative action, **Justice Samuel Alito proposed a hypothetical**: If an applicant immigrated from Africa to a white, rural area in the US, couldn't they write an essay about dealing with "huge cultural differences," leaving race out of it?

As a former foster youth who felt tasked with explaining an incredibly complicated personal history in several hundred words on my college applications, this argument makes me want to bash my head against the wall. So much of the rhetoric around admissions supposes that it's easy for an applicant to summarize their life. But it's not, and the experiences of those of us who've been through the child welfare system make that abundantly clear.

## College Essays Can Force Kids to Relive Trauma

College essays are not an alternative to making a school diverse, and their limiting format can force applicants to turn their lives into florid trauma porn. Colleges should, of course, consider the circumstances and systemic forces that shape opportunities for applicants, but sometimes the burden of laying out those issues in an essay can be so arduous that it discourages people from even applying. Recognizing these complications is essential to understanding the debate over affirmative action — and what should come next if, **as expected**, the Supreme Court strikes down race-conscious admissions this term.

# The Opinion Seems to Trap Students Into Writing About Identity Through Offensive Tropes

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At the same time, as all parties agree, nothing in this opinion should be construed as prohibiting universities from considering an applicant's discussion of how race affected his or her life, be it through discrimination, inspiration, or otherwise. See, e.g., 4 App. in No. 21-707, at 1725-1726, 1741; Tr. of Oral Arg. in No. 20-1199, at 10. **But,**

## What you can do

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- Give them concrete strategies for the essay other than recounting trauma or framing their identity as a deficit narrative—or as a condescending “inspiration” narrative.
- Be mindful of the emotional well-being reasons why some students might decide not to apply to schools that require essays and supplementals. Be prepared for that conversation.
- Proactively create support systems for students through college application process.



# #3

## Provide Professional Development for Letters of Recommendation and for Teachers of the College Essay

15 JUSTICE GORSUCH: Okay. How do you  
16 respond then to -- again, we have many briefs on  
17 this point from Asian American applicants who  
18 have -- and they say there's an entire industry  
19 to help them appear less Asian on their college  
20 applications and that they consider elite  
21 colleges to have Asian quotas effectively, if  
22 not in name.




## Julie J. Park


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Dr. Julie J. Park and Sooji Kim dug deep into Harvard's Letters of Rec data.

BIPOC students score worse on "character" than white students

Why?



Many more BIPOC students attend public schools where teachers spend far less time on Letters of Rec...

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Private schools come with intensive support for college counseling, which translates into highly personalized and individualized letters of recommendation. In contrast, the average student-to-counselor [ratio](#) for public schools in 2017 was 663 to 1 in California, 499 to 1 in Washington State, and an astounding 741 to 1 in Michigan. How can a counselor juggling hundreds of students be expected to write lengthy, individualized letters detailing what makes every one of them a shining star?

In a [recent study](#), Tara Nicola, a Harvard doctoral student, and collaborators found that counselors at large, public high schools were more likely to recycle and reuse text from letters of recommendation submitted to colleges. That could help explain why letters for white students were better than those submitted for Asian Americans. And while that is unfair, since most students have little control over where they attend school, it is a distinctly different issue than SFFA's claim of Harvard intentionally discriminating against Asian Americans.

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## What you can do

- Provide professional development for teachers on Letters of Rec. Specially, how to connect their experience with students to how they'll contribute on campus.
- Guide teachers on avoiding deficit narratives and the same kind of offensive tropes the Court points to in essays and supplementals.
- If you ask classroom teachers to teach the College Essay, provide PD and support.



PROFESSIONAL  
DEVELOPMENT

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# #4

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Educate  
Administrators and  
Parents on Holistic  
Admissions



# In Holistic Admissions, the Application is Read as a Singular, Unified Document

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Every application the University receives is initially reviewed by one of approximately 40 admissions office readers, each of whom reviews roughly five applications per hour. *Id.*, at 596, 598. Readers are required to consider “[r]ace and ethnicity . . . as one factor” in their review. *Id.*, at 597 (internal quotation marks omitted). Other factors include academic performance and rigor, standardized testing results, extracurricular involvement, essay quality, personal factors, and student background. *Id.*, at 600. Readers are responsible for providing numerical ratings for the academic, extracurricular, personal, and essay categories.

Be Aware That Some States Are Already Taking Action to Limit Scholarships. And Signalling that Affinity Groups, Housing, Etc. Might Be Next.

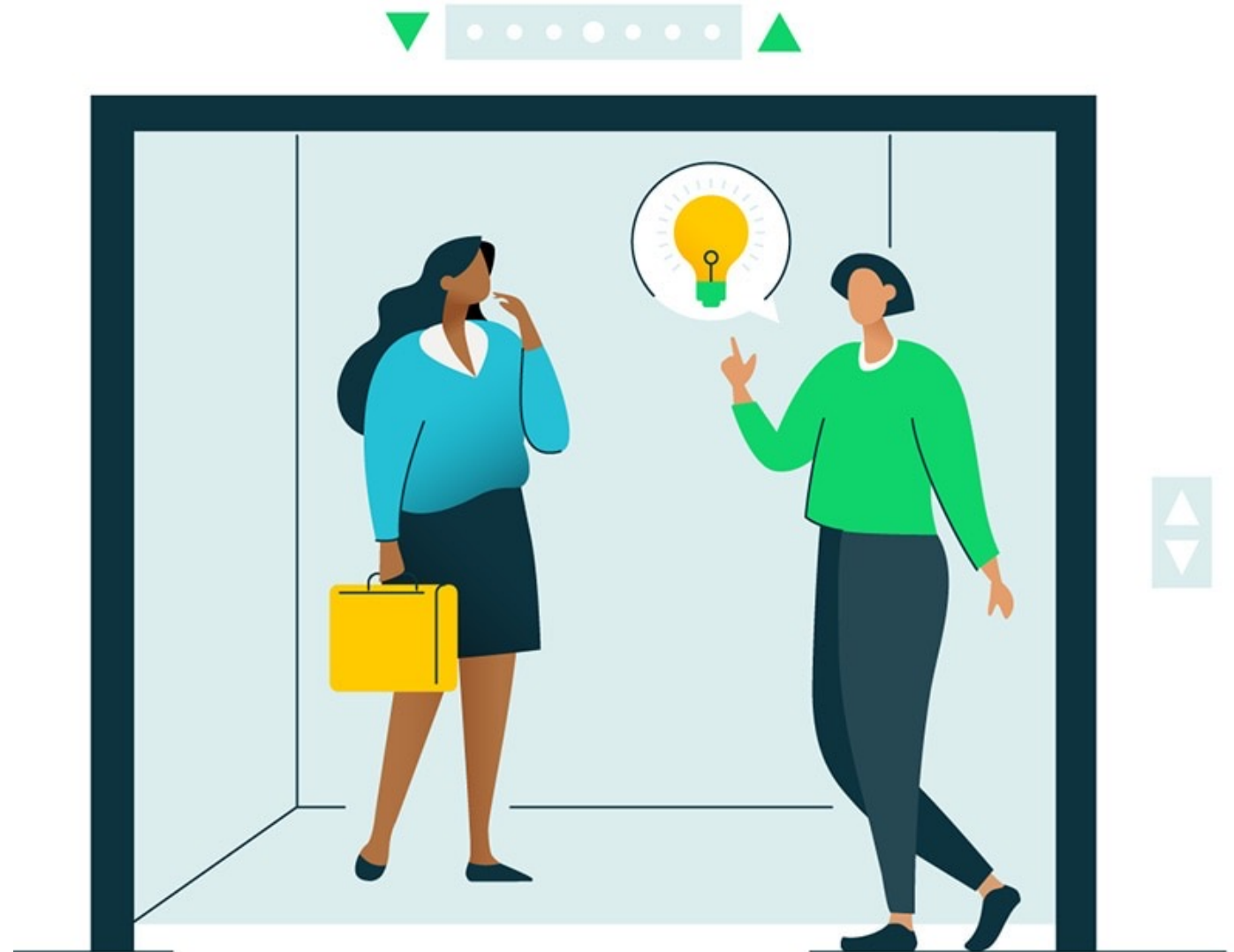
## Scholarships and Recruitment in the Crosshairs

The rulings have already begun to affect areas of higher education beyond admissions policies. On June 29, the same day the decisions came down, Missouri attorney general Andrew Bailey ordered all higher education institutions in the state to end all financial aid or scholarship programs that take race into account, with which the University of Missouri system promptly complied.

But the underlying premise of Bailey's order, that the SFFA decision can be applied to "race-based scholarships," is not a legal certainty. Luiz Maldonado, vice president for government relations at the American Association of State Colleges and Universities, said that in his reading the decision deals expressly with admissions and any attempts to conjecture about its further reach are just that—guesses.

## What you can do

- Prepare an elevator speech on “test optional” and holistic admissions for administrators and parents.
- The Chief Justice specifically describes how the application is read. Use that to explain your guidance for students.
- Align across schools, delivering same messages in administrator meetings and at college nights.



# What About Colleges?



# #1

Even if you don't officially consider race, you should still review your policies and practices against this new guidance

It is a disturbing feature of today's decision that the Court does not even attempt to make the extraordinary showing required by *stare decisis*. The Court simply moves the goalposts, upsetting settled expectations and throwing admissions programs nationwide into turmoil. In the end, however, it is clear why the Court is forced to change the rules of the game to reach its desired outcome: Under a



## What you can do

- Everybody from Legal, Administration, the Board of Regents, Faculty Senate, etc. need to be aligned on new policies.
- You will need to, in the very least, look at your admissions criteria, policy manuals, professional development, and training for new hires.
- It's going to cost time and budget and institutional energy but potentially save you costly litigation because the Court is inviting new litigation.



# #2

Lean on the  
Education Counsel's  
Playbook for Race  
Neutral Strategies

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## The Playbook: Understanding the Role of Race Neutral Strategies in Advancing Higher Education Diversity Goals

2nd Edition

<ul style="list-style-type: none"> <li>▪ <b>Race Attentive and Inclusive Outreach and Recruitment</b></li> </ul>	<p>This play addresses foundational considerations commonly associated with effective enrollment strategy.</p>
<ul style="list-style-type: none"> <li>▪ <b>Flexible Admission and Aid Criteria and Test Use</b></li> <li>▪ <b>Socioeconomic Status</b></li> <li>▪ <b>Geography</b></li> <li>▪ <b>Experience or Service Commitment Associated with Race</b></li> <li>▪ <b>First-Generation Status and Other Special Circumstances</b></li> </ul>	<p>These plays illustrate the kinds of selection criteria that may be considered as part of individualized, holistic review of applicants for institutional/ program admission, as well as for recruitment, pathways programs, and aid.</p>
<ul style="list-style-type: none"> <li>▪ <b>Percent Plans</b></li> <li>▪ <b>Educational Collaboration Agreements</b></li> <li>▪ <b>Cohort Programs</b></li> </ul>	<p>These plays reflect a broader system design focus, with key elements that may be part of a complement of other enrollment efforts; and some also may enhance the impact of other efforts.</p>

## Education Counsel's List

Here are the  
“workarounds.”

But Be Aware: The Chief Justice Seems to Invite Litigation If These “Workarounds” Are Used to Achieve “Racial Balancing.”

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on how to comply with the majority opinion.) “[W]hat cannot be done directly cannot be done indirectly. The Constitution deals with substance, not shadows,” and the prohibition against racial discrimination is “levelled at the thing,

# #3

Explicitly Write  
Your Supplementals  
to Tie Them to Your  
School's Academic  
and Campus Life  
Programming



Lawyers (and Public  
Perception) See  
College Admissions  
Solely as a Merit-  
Based Enterprise

9 MR. NORRIS: I mean, I think that's  
10 our point, that -- that SAT scores would go from  
11 the 99th percentile to the 98th percentile.  
12 That's not sacrificing academic excellence.  
13 That's moving Harvard from Harvard to Dartmouth.  
14 Dartmouth is still a great school. They get  
15 98th percentile SAT scores. We've got to make  
16 some sacrifices.

17 JUSTICE SOTOMAYOR: I -- I -- I don't  
18 -- I -- I actually --

19 JUSTICE KAGAN: There are those who  
20 love it.

21 JUSTICE SOTOMAYOR: Yeah.

22 (Laughter.)



## What you can do

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- Shifting your quantitative criteria away from “merit” and towards “readiness” and “fit” reframes the narrative of your holistic process.
- Identifying First Generation and other race-neutral statuses that “fit” your school’s programming provides a clear, race-neutral rationale for admission.
- Shows evidence of “individualized” consideration of identity rather than racialized grouping, which the Court finds suspect.



# #4

Review and Revise  
Supplemental  
Prompts to Elicit the  
Information You'll Use  
in Your Holistic  
Process



# What you can do

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- “Why Us?” prompts should explicitly tell students to get very \*specific\* about their reasons for applying.
- This information will help you find the right “fit,” with data that you can point to for each decision.
- Points students away from traumatic life story essays that can be barriers to applying.



# #5

Whatever You Do,  
Document It in Policy and  
Train Your Staff



## What you can do

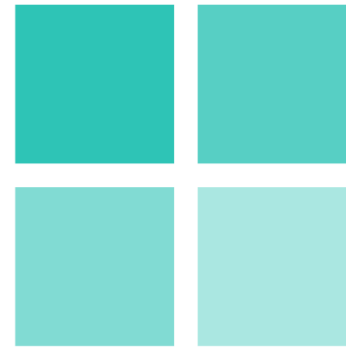
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- All emails, reports, charts, and spreadsheets are potentially court exhibits and (if public) discoverable through Sunshine Laws
- “Intent” will likely be an element of future legal actions. Written records express intent.
- Training and Professional Development really solidify your intent to comply with the law.



Thank You For Your  
Time and Your Work in  
College Admissions!

Please reach out with  
questions or feedback!



# Storyboards

COLLEGE ADMISSION PORTFOLIOS

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[www.storyboardsportfolios.com](http://www.storyboardsportfolios.com)