

This Article considers whether percent plans are a “workable, race-neutral alternative” to affirmative action in admissions. Connecting *Grutter* with doctrine on employment law, it clarifies that “critical mass” must be evaluated quantitatively, particularly in race-neutral regimes. It then finds that percent plan policies have not engendered critical mass because they rely on flawed assumptions about majority-minority schools. In contrast, individualized assessments can realize significant diversity gains in the same settings within the constitutional limits to college and universities’ latitude to weigh race. These findings support the notions that percent plans are not “workable” policies and that affirmative action should remain constitutionally permissible.