



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS
MIDWESTERN DIVISION, CHICAGO OFFICE
500 WEST MADISON STREET, SUITE 1475
CHICAGO, ILLINOIS 60661

JUN 20 2007

TEL: 312-730-1560
TDD: 312-730-1609
FAX: 312-730-1576

Axel D. Steuer, Ph.D.
President
Illinois College
1101 West College Avenue
Jacksonville, Illinois 62650

Re: OCR Docket #05-06-2154

Dear Dr. Steuer:

On December 18, 2006, Illinois College (College) submitted a Settlement Agreement (Agreement) to resolve the above-referenced complaint and to ensure that the College complies with the requirements of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 (Title IX), and its implementing regulation, 34 C.F.R. Part 106. On March 2 and April 13, 2007, OCR received reports from the College regarding its implementation of the Agreement.

Item #1 of the Agreement required the College to conduct a thorough and impartial investigation of the allegation that a student at the College (Student A) was subjected to sexual harassment on several occasions during the 2006 pledging season. Based on the information provided, OCR determined that the College's Sexual Harassment and Grievance Officer (Officer) conducted a thorough investigation of Student A's allegation by interviewing pertinent witnesses and considering the evidence produced by the interviews.

Item #1 also required the College to determine whether sexual harassment of Student A had occurred and to notify Student A of its determination. In its March 2 report, the College documented that its review of the evidence established that sexual harassment had occurred with respect to two of the three literary societies that were investigated and, in a letter dated April 13, 2007, Student A was notified of the College's determinations. Based on the information provided, OCR determined that the College has met its obligation under Item #1 of the Settlement Agreement.

Item #2 of the Settlement Agreement required the College to take reasonable, timely, age appropriate and effective corrective action, including actions to end the harassment, eliminate the hostile environment and prevent any recurrence of sexual harassment if it determined that sexual harassment had occurred. In its April 13 report, the College informed OCR that it had already instituted corrective actions against one literary society as a result of the College's spring 2006 investigation of Student A's internal sexual harassment complaint. The corrective actions included sexual harassment training and a revision of its pledging program. As a result of its subsequent investigation, the College determined that the society should

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continue to be closely monitored by the Dean of Students and that all pledges and existing members would be required to undergo annual sexual harassment training at the commencement of the pledging season. The College also warned the society in writing that additional incidents of sexual harassment would result in further, more severe sanctions.

Based on the facts and circumstances of the sexual harassment by the second literary society, the College suspended it for two weeks from use of its meeting hall. In addition, the College required all pledges and existing members to undergo mandatory sexual harassment training at the commencement of the pledging season each year. The College also warned the society in writing that additional incidents of sexual harassment would result in further, more severe sanctions. In addition, the College sent warning letters to several individual members advising them that additional incidents of sexual harassment would result in "severe sanctions."

OCR contacted Student A, who was participating in an off-campus program in Spring 2007, when the College completed its investigation of the alleged sexual harassment. Student A advised OCR that she had received counseling after the incidents in 2006; she stated that she did not believe she needed additional counseling.

Based on the above, OCR determined that appropriate and effective action was taken by the College against both literary societies in an effort to end the harassment, eliminate the hostile environment and prevent any recurrence of the harassment in future pledging seasons. Accordingly, OCR determined that the College has met its obligations under Item #2 of the Agreement.

OCR determined the College has fulfilled its obligations under the Agreement. Therefore, OCR is closing its monitoring of this case as of the date of this letter. I would like to thank you and Mr. Thomas L. Veith, Attorney at Law, for the cooperation extended to OCR throughout this complaint investigation, including OCR's monitoring of the implementation of the Agreement. If you have any questions regarding this matter, you may contact me at (312) 730-1560.

Sincerely,



Jeffrey Tumbull
Team Leader

cc: Mr. Thomas L. Veith, Attorney at Law