



UNITED STATES DEPARTMENT OF EDUCATION  
REGION I  
JOHN W. McCORMACK POST OFFICE AND COURTHOUSE, ROOM 222  
POST OFFICE SQUARE  
BOSTON, MASSACHUSETTS 02109

JUL 23 2001

Mr. Leo I. Higdon, Jr.  
President  
Babson College  
Babson Park, Massachusetts 02457-0310

OFFICE FOR  
CIVIL RIGHTS

Compliance Review No. 01-00-6003

Dear President Higdon:

The Office for Civil Rights (OCR) has completed the investigation of the above-referenced compliance review. During the investigation we reviewed sexual harassment issues at Babson College (College) and the College's procedures for addressing complaints of discrimination on the basis of sex. We also investigated the actions the College takes to prevent sexual harassment on campus and whether a campus environment existed that is hostile to students based on their sex.

This review was conducted under the jurisdiction of Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. 1681 et. seq., and its implementing regulations found at 34 C.F.R. Part 106 (Title IX) which prohibit discrimination on the basis of sex in any program or activity that receives Federal financial assistance from the U.S. Department of Education. The College is subject to the requirements of Title IX because it receives Federal financial assistance from the U.S. Department of Education.

During the investigation, OCR reviewed information received from the College and interviewed College staff and students. Based on the information obtained, OCR found some areas that needed the College's attention. These areas were: (1) The appointment of a Title IX Coordinator as required by the Title IX regulation; (2) review and clarification of its grievance procedures for students and faculty; and (3) training on sexual harassment and the complaint procedures.

On February 5, 2001, we notified the College about our concerns and we met with the Dean of Students and the Director of Human Resources on May 11, 2001. The College agreed to address our concerns. On July 9, 2001, we received the College's response, in which it agreed to take numerous actions to address OCR's concerns, including:

- Appointing a Title IX Coordinator and publicizing the appointment through e-mail and revised written publications.
- Revising its grievance procedures to make them clearer. The revisions in the grievance procedures will be discussed and then will appear in the student, faculty and staff handbooks. The revised student handbook will also be available on-line in the fall of 2001. In addition, the College is considering the creation of

an Ombudsman Program to give all members of the College community another avenue to express issues of concern.

- Adding training on sexual harassment to the College's First Year Experience program.
- Sending a letter, which will also be sent to students annually, explaining sexual harassment and how they can complain.
- Repeating its Sexual Harassment Training for all supervisors and managers this summer.

We reviewed the College's proposed actions and found that they address our areas of concern. The proposed actions also include items that will take place during the summer and fall 2001. Based on the College's proposed actions, OCR will end the investigation of this compliance review as of the date of this letter.

As is our standard practice, OCR will monitor the implementation of the College's proposed actions. The first monitoring report is due in our office on January 31, 2002. In that report, we would like to have copies of e-mail messages sent to students, faculty and staff in July and September 2001, to inform them about the appointment of the Title IX Coordinator, including her office address and telephone number, copies of handbooks for students, faculty and staff, and a copy of the annual letter sent to students explaining sexual harassment and how individuals may file a complaint. We would also like to receive a copy of the revised grievance procedures and evidence of the training in sexual harassment for supervisors and managers, including the names and titles of the persons attending the training and the date(s) of the training. Finally, we would like documentation about how information or materials about sexual harassment has been included, or will be, included in the First Year Experience program.

We thank you and the College community for their cooperation during this investigation. The Director of Human Resources and Dean of Students have been particularly helpful. We are pleased that the College has agreed to take additional steps to help ensure that its campus is free of sexual harassment. If you have any questions, you may reach me at (617) 223-9667. You may also call Ralph B. D'Amico, Jr., Team Leader at (617) 223-9700 or Maria Montalvo, the investigator assigned to this review, at (617) 223-9672.

Sincerely,



Thomas J. Hibino  
Director

Enclosure

cc: Mr Frank Aubuchon