



BENTLEY COLLEGE

175 Forest Street
Waltham, Massachusetts
02452-4705

May 29, 2001

Office of Human Resources

U.S. OFFICE OF EDUCATION
BOSTON 2

TEL: 781.891.347
FAX: 781.891.245
www.bentley.edu

Jul 12 11 12 AM '01

Ms. Donna L. Russell, Team Leader/General Attorney
U.S. Department of Education Office of Civil Rights
John W. McCormack Post Office and Courthouse
Post Office Square
Boston, MA 02109

Re: Compliance Review No. 01-00-6004

Dear Ms. Russell:

During our meeting that occurred on December 14, 2000, the U. S. Department of Education, the Office for Civil Rights ("OCR") provided Bentley College Administrators with the following feedback:

In the area of policies and procedures, OCR found that:

- Policies and procedures dealing with sexual harassment are published in the Student Handbook.
- Notices are posted in all the restrooms. This course of action is not generally taken at other schools.
- Sexual harassment information is readily available.
- Bentley College coordinates efforts to insure that there is awareness in the community about how sexual harassment issues are addressed. Bentley is "better than other schools" in this regard.
- When there are complaints, there is an efficient, swift, consistent, and severe response. Bentley seems to have a "zero tolerance" for inappropriate behavior. Confidentiality is maintained. Student Affairs is very supportive. Protection is provided for the victim. Cases are triaged; there is medical and psychological support and safety measures are taken to protect the person.
- Bentley College does a remarkable job on policies and procedures. In fact Bentley is a model for other schools and we are to be commended in this area.
- The College was asked if the Student Handbook was available on-line and the response from the College was yes.

In the area of prevention efforts, OCR found that:

- Bentley College has the most comprehensive systems OCR has seen in an academic setting. OCR found no cultural issues with international students.
- OCR has no formal findings of law. That is, there are no violations of federal law.
- Weekend Briefings - No other school has this kind of process in place. The most significant factor is that the briefings allow Bentley to catch students who are at risk, i.e. Bentley provides a safety net for at risk students. This is a very strong asset for Bentley and OCR asked permission to share this strategy with other schools.
- Reported incidents are consistently addressed through the judicial system and the judicial system seems to work.
- Bentley's Alcohol and Other Drug Counselor is another asset for the school.

in the spirit of collaboration, OCR said they would like to engage in discussion and negotiations around several environmental issues: (A) Level of Staffing in Campus Police, (B) A hostile environment in and around the residential halls and under reporting of incidents of sexual harassment, (C) Student access to health services, (D) Faculty student, and staff lack of awareness about how to address sexual harassment issues within the community, and (E) Sanctions for students who engage in sexual harassment.

Bentley proposes the following goals, time lines, and person(s) accountable, to address the concerns raised by OCR:

(A) Problem: Level of Staffing in Campus Police.

Solution: Increase Campus Police staffing.
Time line: July 1, 2001 and July 1, 2002.
Accountability: Ernest Leffler, Chief

(B) Problem: Hostile environment in and around student resident halls and under reporting of sexual harassment incidents.

Solution: Continue training for RA's and RD's; discuss examples of sexual harassment, hostile environment, and the importance of reporting.
Time line: August 2001
Accountability: Earl Avery

Solution: Add sexual harassment training as a component to First Year Seminar, which all freshmen are required to take.
Time line: Fall semester 2001
Accountability: Earl Avery and Gerald Stenerson

Solution: Publish aggregate data on judicial violations and sanctions and publish an article in the Vanguard to highlight and educate students about sexual harassment.
Time line: Fall semester 2001
Accountability: Andrew Shepardson

Solution: Develop a short survey to assess the specific type of harassment that the OCR team spoke of in order to have a clear picture of the scope of the issue and to measure and change over time. We might be able to use data already collected through other surveys. Develop recommendations.
Time line: Spring 2002
Accountability: Action Team: Brenda Hawks, Mary Marcel, Suzanne Hinton, and Monica Weaver.

Solution: Review the results of the work of the Action Team and where appropriate, implement recommendations that can enhance the Training for the RD's and RA's and modify the curriculum for the First Year Seminar
Time line: Summer 2002

Accountability Earl Avery and Gerald Stenerson

Solution: Explore further the idea of a program on male violence as a part of the first year seminar. Preliminary discussions make this look like a possibility as it was thought of as a way to address violence on campus. Sexual harassment as psychological or verbal violence would certainly fit into the scheme.

Time Line: Fall semester 2002

Accountability: Gary Kelly and Roger Danchise

(C) Problem: Consider wider student access to health services.

Solution: Address access with VP for Construction

Time line: Spring 2001

Accountability Kathleen Yorkis

(D) Problem: Increase awareness of faculty, students, and staff about how to address sexual harassment issues within our community.

Solution: Current sexual harassment policy is being reviewed and revised. In accordance with Massachusetts law, sexual harassment policy is disseminated annually to the community. Revised policy will be emailed to the community.

Time line: Fall 2001

Accountability Earl Avery

(E) Problem: Sanctions for students who engage in sexual harassment needs to be reviewed.

Solution: Review and analyze sanctions that have been imposed since 1996 and if appropriate, revise the sanctions policy.

Time line: Fall 2001

Accountability Andrew Shepardson

Respectfully submitted,



Barbara Addison Reid
Executive Director of Human Resources

Cc: Ruth Ricker
Kathleen Yorkis
Charles Hadlock
Earl Avery
Roger Danchise