



Bob Jones University's Response to the GRACE Report Recommendations

INTRODUCTION

Sexual abuse and assault are growing societal challenges. They are heinous crimes and perpetrators must be brought to justice by our system of law. We are all awakening to the magnitude of these issues and are more publicly addressing them and the trauma they inflict on victims. Over the last few years, sexual abuse and assault have come to the forefront of thinking in the higher education community as institutions are coming to grips with the magnitude of the problem among students and grappling with appropriate policies and procedures for preventing sexual assault and responding to those involved. In 2012, Bob Jones University voluntarily undertook an unprecedented review of its policies and procedures for responding to students who reveal they were abused or assaulted, primarily before they enrolled as students. In taking this bold step, we subjected ourselves to potential misunderstanding and criticism, but we did so because appropriately responding to victims is more important than our institutional reputation.

As part of the review, 116 people were interviewed, approximately 40 of whom were abuse/assault survivors. Most of these were former Bob Jones University or Bob Jones Academy students, and the individual experiences they reported spanned nearly 40 years.

The report resulting from the review has assisted the University in improving our total student experience, including our response to victims of sexual abuse/assault. Some initiatives discussed below are a direct response to the recommendations in the GRACE Report; others go well beyond. Some were in progress before the report; others have been started since. A few have yet to be initiated.

BACKGROUND AND BJU'S OBJECTIVES

BJU's understanding of sexual abuse/assault counseling and our procedures for counseling victims developed and improved over time as our primary counselor worked to gain knowledge, reading books and articles on the topic as they began to be published in the mid- to late '80s. Diane Langberg, current chair of the executive board of the American Association of Christian Counselors and GRACE board member, recounts a similar experience. In her 2003 book, "Counseling Survivors of Sexual Abuse," she said of her own professional training, "Sexual abuse was not ever discussed in graduate school. There were no seminars, workshops or articles available. I learned from my clients." In late fall 2011, BJU's former president, Dr. Stephen Jones, asked the Board of Trustees to form a committee to review our policies and procedures for handling reports of sexual abuse and assault and recommend needed changes or enhancements.

An external committee experienced in serving sexual abuse and sexual assault victims was formed in early 2012, and at their recommendation, in summer 2012, BJU instituted a new Abuse and Neglect Policy, appointed a full-time biblical counselor to support students who have experienced sexual abuse or assault, and began seeking an independent person or organization to perform a more in-depth review.

In November 2012, after consulting with the executive committee of the Board of Trustees, BJU contracted with GRACE to undertake the comprehensive, independent review. While we were unaware of any outstanding issues, BJU initiated this review to achieve two primary objectives:

- To ensure BJU's policies and procedures for handling reports of sexual abuse/assault comply with every aspect of the law and ensure a loving, scriptural response to those involved.
- To provide BJU an opportunity to communicate with and seek the forgiveness of any former students or other individuals who were not helped with our response when they reported to a BJU representative that they had been abused/assaulted.

In January 2013, both BJU and GRACE promoted a link to a survey where individuals could communicate directly with GRACE. Based on survey responses, GRACE interviewed approximately 40 abuse/assault survivors. They delivered a preliminary report to BJU on Nov. 29, 2014. On Dec. 11, 2014, GRACE issued a public report of its findings during the nearly two-year review.

Throughout the entire process, including the investigation and the reporting of findings, GRACE remained totally independent of BJU.

We undertook this project to continue to improve the ways we minister to our students, particularly those who have suffered sexual abuse or assault. We are thankful for those who participated in this challenging, and in some cases, painful process. We are grateful for what we have learned through the process. We have prayerfully analyzed the information in the report, and while the process and the report are not perfect, some of the findings have given us a better understanding of how we can serve our students more effectively.

BJU's APPROACH TO THE RESPONSE

Presidential Advisory Committee

After receiving the report, BJU's president announced that he would appoint a committee to provide advice and counsel on the recommendations in the report. The advisory committee consisted of a biblical counselor, an executive administrator of a regionally accredited university, a professor of pastoral counseling, a leading attorney in abuse and abuse prevention a human resources executive and a member of the BJU Board of Trustees. These individuals requested we keep their names confidential, and we are honoring their request. The committee met with the president and the internal team preparing BJU's response in February 2015. The committee provided valuable input on the issues illuminated in the report and assisted the executive team in refining initiatives outlined in BJU's response.

In addition the president solicited input from other individuals, from both inside and outside the University, who are knowledgeable of specific related topics.

BJU's Core Commitments

BJU's review of and response to the report are based on the following commitments.

1. We are committed to the inerrancy, authority and sufficiency of Scripture and, therefore, measured all decisions and changes within a biblical framework.
2. We are committed to ensuring BJU's policies and procedures for handling reports of sexual abuse/assault reflect best practices; facilitate a loving, compassionate, scripturally based response to reports of sexual abuse and sexual assault; and remain in full compliance with federal and state laws.

3. We are committed to providing a place of solace to victims of sexual abuse/assault.
4. We are committed to communicating with and seeking the forgiveness of any former students or other individuals who came to us in their time of need and did not experience the loving, comforting environment they deserved.
5. We are committed to continue to compassionately serve our student body with care and protection, recognizing the importance of every single individual.
6. Finally, we are committed to becoming more effective in developing disciples of Jesus Christ through an improved institutional culture that nurtures the pursuit of Christlikeness in a university setting.

Recognizing the importance of the experience of each individual student, BJU's commitments are based on Micah 6:8:
"He hath shewed thee, O man, what is good; and what doth the Lord require of thee, but to do justly, and to love mercy, and to walk humbly with thy God?"

RESPONSE TO VICTIMS

Initial Public Apology

After analyzing the preliminary report, President Pettit—on Wednesday, Dec. 10, 2014—publicly apologized to those who were not helped by the University's response to their reports of abuse.

"On behalf of Bob Jones University, I would like to sincerely and humbly apologize to those who felt they did not receive from us genuine love, compassion, understanding, and support after suffering sexual abuse or assault. We did not live up to your expectations. We failed to uphold and honor our own core values. We are deeply saddened to hear that we added to the pain and suffering. To them, I would say—we have carefully listened to your voice. We take your testimony in this report to our hearts. We intend to thoroughly review every aspect and concern outlined in the investigation and respond appropriately."

This apology was based on the themes in the report. We feel great sorrow for former students who suffered sexual abuse/assault and did not find help at BJU. We greatly desire to speak directly with those who reported we did not serve them well. More specific apologies to individuals will require our seeing what these individuals see.

Listening to Victims

As stated, we greatly desire direct personal contact with each victim of sexual abuse or assault who was not helped by our response to their disclosure. While we realize months or even years may pass before some survivors are willing to talk with us, the invitation for dialogue is open and will remain open. We sincerely want to better understand their individual experiences. We want to be of assistance to them and to hear their suggestions for improving our response to victims. If former students who were abuse/assault survivors will contact the BJU president's office, we will arrange a meeting with the president or other university representative with whom the victim will be comfortable speaking.

Degree Completion

We are aware of only one person who left the University without completing a degree following disclosure of abuse. We are willing to assist this abuse/assault survivor to complete her degree at BJU or another institution of her choice. Such assistance would be available by direct request to the president's office.

Victim Advocate

BJU's Title IX coordinator already provides students the option of having an advocate and solicits advocates on an as needed basis. No later than the beginning of the 2015–16 academic year, BJU will identify and train a larger pool of individuals—inside and/or outside the University—willing to serve as advocates and clearly define the voluntary role. An advocate's role will be to encourage and assist the victim without any competing objectives.

File Review

An outside attorney licensed in South Carolina who previously served in a prosecutorial role with the U.S. Attorney's Office and is knowledgeable regarding reporting obligations under South Carolina law conducted a review of our files that we are aware reference sexual abuse/assault.

Sermons/Materials

We have begun reviewing all sermons and materials cited in the report. These materials are being evaluated on the basis of Scriptural accuracy and our developing understanding of the issues associated with sexual abuse and assault. We will remove any that do not reflect sound biblical teaching or are found to be insensitive to abuse or assault victims.

With regard to the writings of Jim Berg, we have reviewed his written material on a wide variety of topics and have found them to be faithful to Scripture. Obviously, as would be expected of any writer, his later works reflect the benefit of ongoing growth in and mastery of his subject matter. Thousands of believers have benefited from his books and hundreds of churches have used his materials with great spiritual profit. His book, *Changed into His Image* received a positive review from the late Roy Zuck in *Bibliotheca Sacra*, the theological journal of Dallas Theological Seminary. His writings have appeared in the *Journal of Biblical Counseling* and are recommended reading for courses at several Bible colleges and seminaries, including Southeastern Baptist Theological Seminary and Southern Baptist Theological Seminary. We will continue to use these materials in our courses and make them available in our campus store and through BJU Press.

POLICIES

Policy Updates

In the last two years, the University has completed two rounds of Abuse and Neglect Policy reviews and updates. In 2013 we rewrote our policy document with local legal assistance and in 2014 updated the policy with the assistance of MinistrySafe.¹

We will continue to work with an organization such as MinistrySafe to assist with an annual review and update of policies related to abuse response and prevention. This review will be done in conjunction with our Title IX coordinator. Our goal will continue to be policies and procedures that ensure a loving, compassionate, scripturally based response to abuse/assault victims and that continue to conform to both South Carolina reporting requirements and Title IX and Clery Act requirements.

¹ Based in Fort Worth, Texas, and founded by attorneys Gregory Love and Kimberlee Norris, MinistrySafe provides Sexual Abuse Awareness Training and assists child care entities and organizations in the design and implementation of safety systems which reduce the risk of child sexual abuse. In addition, Greg Love and Kimberlee Norris have a nationwide sexual abuse litigation practice representing victims of sexual abuse across the U.S. The firm also represents a number of ministries, camps, churches, schools and other entities delivering children's services. Each October, MinistrySafe conducts sexual abuse awareness training at BJU which is required for all students, faculty and staff. They regularly assist with the review and updating of BJU and BJA abuse and neglect policies and have advised Student Life on informing students of the scope of Biblical counseling and BJU executives on the employee/student screening process.

BJU policy designates all employees as mandatory reporters of child sexual abuse. This policy exceeds both state and federal legal requirements.

For individuals 18 or older who disclose sexual abuse that occurred before they were 18, federal law prohibits colleges and universities whose students receive federal funds from reporting the abuse without the victim's consent unless mandated by state law. South Carolina law mandates such reporting if there is reason to believe that there is another child (who is under 18 at the time of the disclosure) or vulnerable adult who has been abused or neglected.

For an adult student at Bob Jones University that discloses an on-campus sexual assault, the student is encouraged to report to local law enforcement immediately. Institutions of higher education are to provide adult student victims the option to (1) notify proper law enforcement authorities, including on-campus and local police; (2) be assisted by campus authorities in notifying law enforcement authorities if the victim so chooses; and (3) decline to notify such authorities. In addition, in compliance with Title IX, BJU will initiate an internal investigation and disclose the assault on its annual Clery Report.

For an adult student at Bob Jones University that discloses an off-campus assault, the student is encouraged to report to local law enforcement immediately. Institutions of higher education are to provide adult student victims the option to (1) notify proper law enforcement authorities, including on-campus and local police; (2) be assisted by campus authorities in notifying law enforcement authorities if the victim so chooses; and (3) decline to notify such authorities. In addition, in compliance with Title IX, BJU will initiate an internal investigation and disclose the assault on its annual Clery Report if the location of the incident falls within the geographical area covered by Clery.

We believe in several instances, the GRACE report did not give appropriate consideration to BJU's Title IX obligations. Further the report imposed a "moral obligation" to report to legal authorities when such a report would have been a violation of federal law.

Annual policy reviews will occur late spring/early summer to accommodate implementation in the academic year beginning in August.

Policy Accountability

As we review and update the policy in spring 2015, we will add a provision that each employee will annually affirm he/she is following the Abuse and Neglect Policy and has fulfilled all reporting obligations within the last year.

Bob Jones Academy Policies

While Bob Jones Academy employees follow mandatory reporting requirements, the Academy currently has a number of other policies for the Child Development Center, the use of volunteers, etc. With the assistance of MinistrySafe, we are preparing a consolidated student safety policy manual for BJA tailored specifically to ensuring the continued safety of minors. It will incorporate all BJA policies into one manual.

TRAINING AND EDUCATION

Abuse/Assault Awareness Training

Each October the University works with MinistrySafe to conduct Abuse/Assault Awareness Training which is mandatory for all new university students and all new university or academy employees. After attending the training session, each individual is required to take and pass an online quiz in order to receive a certificate of completion. We have trained approximately 5,000 students, faculty and staff the past two years and will continue this training on an annual basis.

In spring 2015, we will formalize a plan for refresher training, including how frequently faculty and staff will attend the training in person and how frequently they will require refresher training via video. The plan will also specify how soon new hires will be trained.

As a follow-up to this training, with the assistance of MinistrySafe and appropriate academic deans, faculty and staff, existing guidelines are being reviewed and enhanced where appropriate for the following students who work with or come in contact with minors on or off campus:

- Education majors
- Nursing majors
- Pre-med/dental students
- Ministerial students
- Students who participate in Outreach Ministries
- Students who work in the University's summer camp program
- Student athletes who conduct sports clinics for minors
- Students whose academic internships may bring them into contact with minors
- Students who participate on BJU Ministry Teams (summer and during academic year)
- Admission recruiters

Guidelines for students who work for Bob Jones Academy during the academic year or during summers are being included in the new BJA policy manual.

Student Training in Academic Programs

A number of courses within our curriculum address sexual abuse/assault prevention and reporting.

School of Education—All teacher education candidates receive specific training in multiple courses regarding abuse prevention/reporting throughout their four-year education.

College of Arts and Science—The Division of Nursing addresses the subject in three courses, and all clinical students and faculty, through the Greenville Health System (GHS), complete an annual online hospital orientation that also addresses abuse.

College of Arts and Science—Pre-med students are trained by GHS prior to their internship course at GHS. No training is provided currently for pre-dent students who intern in private dental practices, and the faculty acknowledges the need to close this gap.

School of Religion—Six ministry courses address various aspects of abuse/assault prevention/reporting relevant to students preparing for ministry. Several classes regarding legal issues in counseling and including one class specifically on child abuse and neglect are taught by our Title IX coordinator. Other courses address civil law as it affects pastors, churches, Christian schools and their ministries; maintaining appropriate relationships while

working with youth and in discipleship situations; and the importance of background checks and safeguarding those who work in ministries as well as the individuals they serve.

Curriculum in other appropriate programs will be reviewed and improved as appropriate.

In addition, as part of its annual conference series, in November 2012, BJU's Seminary sponsored a national conference entitled "Sexual Abuse and the Church," designed to equip pastors and church leaders to biblically handle problems and issues of abuse. Conference speakers included a number of experts in counseling and/or advocating for victims as well as law enforcement officials. BJU Seminary students and faculty also attended the sessions.

Faculty/Staff Training

To further strengthen compliance with Title IX procedures, in spring 2014, seven BJU faculty and staff were trained by the Association of Title IX Administrators in Milwaukee to investigate instances of sexual harassment and sexual assault using a civil rights investigation model. BJU's Title IX coordinator calls on these seven to work in teams of two—one man, one woman—to investigate reported instances. These investigators receive annual supplemental training.

During In-Service at the beginning of the 2014-15 academic year, the Title IX coordinator trained all full-time and GA Student Life staff on Title IX reporting requirements and placed an article in the August 2014 issue of the monthly faculty/staff newsletter summarizing reporting requirements for faculty and staff.

BJU's Title IX coordinator is preparing more comprehensive required training for all faculty and staff on their responsibilities under Title IX regarding reports of sexual harassment and assault and other civil rights violations. This training will be regularly scheduled; the timing and frequency have yet to be determined. A discussion of mandatory reporting of the abuse of minors will be included to further clarify for faculty and staff the difference between sexual abuse and sexual assault and the specific legal reporting requirements for each.

To further assist faculty and staff, by the start of the 2015-16 academic year, BJU will incorporate the best practice used by a number of other higher education institutions of placing a "Red Folder" on the faculty/staff intranet page with detailed, easy-to-follow instructions for reporting sexual abuse, directing a student who has been abused/assaulted to the appropriate resources and helping a student report abuse or assault.

Resident Mentors

The University's official biblical counselors provide all on-campus counseling related to sexual abuse/assault. Resident mentors, however, are an invaluable resource for nurturing and coaching students as they adapt and face the pressures of college life. To better enable resident mentors to assist students, the University is increasing the time resident mentors are trained at the beginning of each academic year and providing them with more robust training in how to mentor in addition to more training on how to help students with academic-related and other issues students face in their day-to-day college experience.

BJU will also create a site on its intranet to provide resident mentors and student discipleship leaders specific guidance on how to respond to common student issues. Such a site will provide information on how to initially respond to and assist a student until the student can obtain help from an experienced counselor.

Abuse Awareness Week

Some of what the report recommends be included in a Sexual Abuse/Assault Awareness Week is included in the annual Sexual Abuse/Assault Awareness training. In addition, we will work with advisors such as MinistrySafe to determine

appropriate content, format and speakers—both external and internal—for an Abuse Awareness Week or Life Skills Week to be conducted once every four years.

Board of Trustees Training

An awareness training session on abuse/assault prevention, response and reporting will be conducted with the Board of Trustees at a time scheduled by the Chairman of the Board. Subsequent new board members will receive training as part of their new board member orientation prior to their first board meeting.

STUDENT EXPERIENCE

Overview

BJU seeks to make disciples of Jesus Christ through a biblically faithful liberal arts educational experience within a decidedly conservative and disciplined environment.

BJU's senior leadership is currently reviewing student development outcomes and student experience programs designed to foster those outcomes. Areas within student development that are under review include the code of conduct and discipline system, residence hall life, leadership training and development, counseling services, and co-curricular experiences. Appropriate changes will be made as outcomes are clarified and programs are reviewed in light of those outcomes.

Residence Hall Evaluations

In spring 2014, BJU changed the residence hall evaluation process, including how the results factor into the identification of future residence hall leadership. Students complete their self-evaluation online and submit it, not to their peer leaders, but to the residence hall supervisor. As part of their self-evaluation, each student has the opportunity to submit the names of fellow students they look to for leadership and recommend for residence hall leadership positions. In selecting individual students for leadership positions, the residence hall supervisor considers both a student's self-evaluations and the collective recommendations of other students. A review of student outcomes and the student development program is currently underway, and additional changes to the self-evaluation process may result from that review.

Individuals

We have in place policies and procedures to safeguard our campus from sexual offenders. For security reasons we do not disclose those policies and procedures. As in the past, our Department of Public Safety will involve local law enforcement if necessary.

COUNSELING

On-Campus Counseling

We believe Scripture is sufficient for addressing and meeting the spiritual needs of individual believers. For this reason, we remain firmly committed to a biblical counseling model as the basis for all of our on-campus counseling. In view of the size of our student population, we will maintain an on-campus biblical counseling function. In this regard, BJU is beginning the process of establishing a student care center staffed by an appropriate number of certified biblical counseling personnel.

If a student selects on-campus biblical counseling, he or she is provided a clear description of biblical counseling and confirms in writing an understanding of the nature and scope of this biblical counseling. At the same time, students will continue to have the option to pursue off-campus counseling from a counselor of their choosing. We recognize there currently may be limits to our ability to deal with certain aspects of trauma present in some cases of sexual abuse/assault.

While we will strive to offer as much help as we can in such cases, students have the option to go to agencies and or organizations that at this time may be better equipped and prepared to offer help in their specific situations.

Office of Women's Counselor

The office of the women's counselor was separated from offices that deal with student discipline in August 2014.

BJU's women's counselor can offer students appropriate confidentiality in line with national norms and practices for biblical counseling. Under Title IX and BJU's discrimination and harassment policy, all other faculty and staff are responsible employees and thus required to report to the Title IX coordinator any instances of sexual misconduct, including sexual assault.

The women's counselor currently uses an acknowledgment form explaining biblical counseling which students sign prior to receiving counseling. We're currently reviewing the acknowledgment form to ensure it is in line with best practices on informed consent.

BIBLICAL COUNSELING DEGREE PROGRAMS

With the support of the Office of Planning, Research and Assessment, and under the leadership of the vice president for ministerial advancement/dean of the seminary and school of religion as well as the chief academic officer, the Seminary and School of Religion have begun a program review of the undergraduate and graduate biblical counseling programs. Per existing program review protocols, the review includes a team of academically experienced and qualified peer reviewers from other seminaries and Christian colleges. Key areas of the review include program learning outcomes, curriculum, resources, and faculty.

In undertaking this review, our commitment is to a biblical counseling model and our desire is to provide a degree that meets the highest educational standards and enables graduates of the Seminary program to receive certification from a nationally recognized biblical counseling association if they desire.

PERSONNEL

Bob Jones University considers all personnel matters private and handles them internally.

OTHER

BJU's response to specific recommendations not included above will be determined in the future.