



August 12, 2016

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Dear Friend,

If you share our view that Bob Jones University needs to do better for its students, please read on. Whether you've experienced spiritual abuse, sexual abuse coverups, violations of student rights of FERPA and Title IX, lack of academic freedom at all levels, or any of the grievances so many people have lamented over the years, we wanted you to know we all have a chance to hold the school accountable. Whatever brings you to the table, your voice and your story deserve to be heard.

In June 2016, BJU was granted provisional accreditation status with the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC). This move opened a window for public, third-party comment, which closes on August 30, 2016. We are encouraging as many individuals as possible to comment in an effort to cause permanent accreditation to be denied.

Please note that SACSCOC requires submissions to be sent in duplicate hard copies (send in two copies of everything you submit). Any submission must be received no later than August 30, 2016, so our recommendation is to mail them no later than August 25-26, 2016. They must also include your signature. SACSCOC will not consider anonymous comments. BJU will receive a copy of your comment and will be asked to respond.

You might respond, "Why take an active part in denying students something that would enhance their academic and career goals?" The answer lies in BJUnity's founding documents. Our purpose is dialogue and change, which is why we choose to add these third-party comments to the public record: to provide documentation and to explain that Bob Jones University's methods of operation and unique application of rules—religious and behavioral—are both detrimental and abusive to its students. Granting them full accreditation would be a gross neglect of due diligence without a full investigation and hearing of how they systematically and intentionally conflate student-conduct infractions with academic standing in ways that violate student freedoms and rights. Furthermore, the methods used, including their counseling procedures for misbehavior, are egregious and violate Title IX and other widely established protections, of which Bob Jones University has not until recently sought exemptions, and then only on a limited basis. (As the affirming alternative for LGBTQIA students and alumni and an organization committed to equality regardless of race, ethnicity, national origin, gender, gender identity, sexual orientation, or religious affiliation, BJUnity strongly objects to any Title IX Waiver BJU might apply for or receive, but we recognize BJU has a right to apply for certain exemptions under Title IX). When these issues are resolved, we will happily encourage BJU's accreditation.

So far, BJU has not responded to our repeated requests for conversation; they continue to systematically abuse and violate student rights. This public third-party comment process becomes another valuable means of protest because even if we fail in preventing their accreditation, we will accomplish two things of worth. First, the Committee will witness how BJU responds to criti-





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cism. These comments will be given to the BJU administration, who “will be invited to prepare a written response to the comments. The third-party comments and any institutional response will be reviewed during the institution’s scheduled formal Committee review” (1). Note that BJU is only “invited” and not required to respond to the comments; any non-response could potentially arouse suspicion in the Committee, who will read the comments, regardless. Second, the comments will form a groundwork of evidence in the BJU record, and if future complaints are made, we will have already laid a foundation upon which new evidence will be more meaningful and indicative of what really happens at “The World’s Most Unusual University.”

We have provided several materials to help you comment. Please disseminate these widely and encourage individuals to submit their stories. We would like to see a groundswell of responses. Numbers do mean something. If you are part of an organization, please consider responding also as a group. Do both!

Thank you for your consideration. We are happy to provide help and assistance.

Sincerely,

The BJUnity Accreditation Task Force

Michael Smith, Chair
Lance Weldy
Keturah Bixby
Jeffrey Hoffman, *ex officio*



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**BJUnity Accreditation
Task Force**

Michael Smith, chair
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Fact Sheet for SACSCOC Third-Party Comment Form

Michael Smith, BJUnity Accreditation Task Force

As you may have heard, Bob Jones University has been granted candidacy for accreditation as of June this year. Public comment on their candidacy must be received in hard copy in duplicate no later than August 30, 2016.

The "Third-Party Comment Form" can be accessed here:

www.sacscoc.org/thirdparty/Third-Party%20Comment%20Form.doc

Your completed packet should be addressed to:

Dr. Belle Wheelan, SACSCOC President

Southern Association of Colleges and Schools Commission on Colleges
1866 Southern Lane
Decatur, GA 30033

We are preparing an extensive public comment as an organization but encourage all who have interest in this matter to respond individually and as any organizational group. We believe a flood of public comments for SACSCOC is a vital way to express our concerns and enter them into the public record. While SACSCOC is primarily tied to academic considerations, BJU is unique in the way it ties discipline for violations of its student code of conduct to academics, often severely undermining students' learning experience.

What should the response entail?

1. You should make reference both to one form of BJU's compliance deficiency and also to appropriate evidence to support your claim. For more specifics, see our SACSCOC Third-Party Comment Form Handout.
2. The response should contain first-hand accounts of infractions of student rights, especially those related to academics, sexual abuse, LGBTQ identity, etc.
3. The response should be as objective as possible with dates, names of persons who conducted the investigation at BJU, descriptions of how the student was treated and also the aftermath including expulsion, etc. Did BJU call your parents? How did this impact your life, your academic future, etc.? The Committee is composed of educators who are not Christian fundamentalists, most of whom place great emphasis on academic freedom, women's rights, and LGBTQ-issues.
4. Be truthful and honest. Do not embellish by telling them what you think they want to hear.
5. Highlight how your academics were affected by any unjust punishment/discipline. Make connections between your education and the university's institutional system to show the Committee how the university's setting can heavily influence student success.



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SACSCOC Third-Party Comment Form Handout

Lance Weldy, BJUnity Board Member

The third-party comment form requires you to provide personal information in Part I. For Part II, you must fill out two Third-Party Comment Information boxes, and then check some tiny boxes, which include acknowledging that you are not currently a student or employed at BJU. This handout should hopefully help you with the major emphasis of this form—Box A and B of Part II.

I. Box A

- The first box asks you to “provide a clear statement describing the institution’s performance in terms of compliance with the standards for accreditation, the *Principles of Accreditation*.”
- The compliances referred to fall under four categories: Principle of Integrity (PI), Core Requirements (CR), Comprehensive Standards (CS), and Federal Requirements (FR).
- For your response, make a general comment about whether BJU is compliant with whichever category/subcategory(ies) of compliance best fit, and then explain how/why with your story.
- You are free to read the entire 44-page document. *The Principles of Accreditation: Foundations for Quality Enhancement* can be found here:
<http://www.sacscoc.orgpdf/2012PrinciplesOfAcrcditation.pdf>
- Most of the listed compliance policies deal more with the academic, curricular, institutional, and financial governance side of things. If you feel those do not fit tightly with your story, there are still ways to make direct or indirect connections between certain policies and student life/academics. Below I have listed several policies, along with explanations for how you might address each, depending on your story.

A. Potential Policies to Use as Examples of Non-compliance

- **PI 1.1 “The institution operates with integrity in all matters.”**
When it comes to “integrity,” they interpret it to be related to the “context of peer review, professional judgment by peers of commonly accepted sound academic practice, and the conscientious application of the *Principles of Accreditation*” (13).

They go on to mention other kinds of things that could fall under this category: “evidence of withholding information,

providing inaccurate information to the public, failing to provide timely and accurate information to the Commission, or failing to conduct a candid self-assessment of compliance with the *Principles of Accreditation*" (13). They even go into more discussion about "integrity" in their 2-page document, "Integrity and Accuracy in Institutional Representation," which can be found here: <http://www.sacscoc.org/pdf/081705/integrity.pdf>. It's interesting how it explains that its listed examples are not exhaustive, "nor does it address all possible situations" (13), suggesting there are lots of other kinds of ways "integrity" could be applied.

- **CS 3.9.1 "The institution publishes a clear and appropriate statement of student rights and responsibilities and disseminates the statement to the campus community."**
This deals with student rights as explained in documents like their Student Handbook (<http://www.bju.edu/life-faith/student-handbook.pdf>). You might be interested in arguing what is considered "appropriate." For example, the current Student Handbook states under University Rights the ability to "Communicate with a student's parents on any situation involving the student" (48). This appears to be in conflict with student privacy rights under FERPA.
- **CS 3.11.2 "The institution takes reasonable steps to provide a healthy, safe, and secure environment for all members of the campus community."**
This standard may provide the most potential for many commenters. It could be applied to anything from having no locks on dorm room doors to anything mentioned in the GRACE Report. NOTE: Because the *Principles of Accreditation* document was last updated in 2012, it does not specifically make mention of recent developments regarding Title IX and responsible employees, but these issues can still be addressed when discussing standards like those mentioned in CS 3.11.2.
- **FR 4.3 "The institution makes available to students and the public current academic calendars, grading policies, and refund policies."**
This could be applied to how BJU provides no refunds for students who are expelled, and the timing of those expulsions in relation to the semester calendar. In the current Student Handbook under the Withdrawals heading, it states that a "student may not withdraw without approval from the Student Life & Discipleship Office. Avoiding potential disciplinary action is not legitimate grounds for voluntary withdrawal" (48).
- **FR 4.5 "The institution has adequate procedures for ad-**



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dressing written student complaints and is responsible for demonstrating that it follows those procedures when resolving student complaints.”

This could be relevant if a student-issued complaint caused undue hardship for that student by the administration.

- **FR 4.6 “Recruitment materials and presentations accurately represent the institution’s practices and policies.”**

The beginning of the FR section explains: “Implicit in every Federal Requirement mandating a policy or procedure is the expectation that the policy or procedure is in writing and has been approved through appropriate institutional processes, published in appropriate institutional documents accessible to those affected by the policy or procedure, and implemented and enforced by the institution” (39).

One could interpret “accessible to those affected by the policy or procedure” to call into question their transparency on student conduct guidelines and disciplinary processes. In your time as a student, were the Student Handbook and Dormitory Handbook used? While the Student Handbook is now made publicly available online, are Dormitory Handbooks (if they are used for current students)? Are they provided for students ahead of time?

B. Citing Sources and Footnotes

- Whatever you choose to talk about, make sure you comment on BJU’s compliance with one or more of the principles/policies, and be sure to provide footnotes of any outside evidence you discuss. We believe SACSCOC follows the Chicago Manual Style Guide for footnotes. If you wish to use that format, this is a great website that explains how to do it: <https://owl.english.purdue.edu/owl/resource/717/01/>. However, don’t let this style guide deter you from submitting your third-party comment. We can help if you have any questions. Below are a few citation examples taken directly from their website as well as the kinds of sources you might be using.
- **General Model for Citing Books**—Maybe BJU Student Handbook?
 1. Firstname Lastname, *Title of Book* (Place of publication: Publisher, Year of publication), page number.
- **General Model for Citing Web Sources in Chicago Style**—Maybe GRACE Report?
 1. Firstname Lastname, “Title of Web Page,” *Publishing Organization or Name of Website in Italics*, publication date and/or access date if available, URL.
- **Online Periodicals (Journal, Magazine, and Newspaper**



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Articles)—Maybe News report about GRACE or BJU?

1. Kirsi Peltonen, Noora Ellonen, Helmer B. Larsen, and Karin Helweg-Larsen, “Parental Violence and Adolescent Mental Health,” *European Child & Adolescent Psychiatry* 19, no. 11 (2010): 813-822, doi: 10.1007/s00787-010-0130-8.

- **Unpublished Interviews**—Maybe a conversation with BJU Administration?

1. Alex Smith (retired plumber) in discussion with the author, January 2009.

- **Personal Communications**—Maybe a phone call with BJU Administration?

1. Patricia Burns, e-mail message to author, December 15, 2008.

- **Public Documents and Unpublished Materials**—Maybe Course Syllabus or Class Notes/Materials?

1. Firstname Lastname, “Title of Unpublished Material” (source type identifier, Place of Publication, year of publication), page number(s).

II. Box B

- The second box requires you to “Describe the documentation produced to support your comments.” Here you can discuss the kinds of sources you have listed in your footnotes from the first box and explain why they are significant, etc. You could also explain here how and why you are attaching copies of any sources you think the committee should read. (**REMEMBER: Provide 2 copies of everything you submit.**) Obviously, if there are documents you did not footnote in the previous box, discuss those here, maybe such things like your academic transcripts when you discussed your grades in Box A, etc.

III. Other Thoughts

- You must give your comments in hard copy form, and you must give two copies. Yes, they must be snail-mailed. Your comments must reach the President of SACSCOC **before August 30, 2016.**

Dr. Belle Wheelan, SACSCOC President
Southern Association of Colleges and Schools
Commission on Colleges
1866 Southern Lane
Decatur, GA 30033

- You will be required to sign your name on this document, so

do not assume that your comment at any point will be anonymous or private, as it will be shared with BJU.

- Your submission does **not** need to be 10 pages long. It might only take you one page to convey what you need to say in both boxes. However long it takes, just make sure that you not only make reference to one form of compliance deficiency, but that you also provide the appropriate evidence to support your claim. The comment form says, “The Commission does not consider unsupported comments to be substantive, and only substantive comments will be forwarded to the institution for response or included in the report.”

IV. SACSCOC Links

- “Third-Party Comment Form”
www.sacscoc.org/thirdparty/Third-Party%20Comment%20Form.doc
- *The Principles of Accreditation: Foundations for Quality Enhancement*
<http://www.sacscoc.org/pdf/2012PrinciplesOfAccreditation.pdf>
- “Third-Party Comment by the Public” Policy Statement <http://www.sacscoc.org/pdf/Third%20Party%20Comment%20by%20the%20Public-Final.pdf>
- “Integrity and Accuracy in Institutional Representation”
<http://www.sacscoc.org/pdf/081705/integrity.pdf>
- Bob Jones University Requesting Title IX Exemption to Maintain Male Preachers
<http://www2.ed.gov/about/offices/list/ocr/docs/t9-rel-exempt/bob-jones-university-request-04012016.pdf>



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THIRD-PARTY COMMENT FORM

Directions. Please use this form for submitting Third-Party Comments. You must complete all sections before the comment will be forwarded to the institution. **It must be submitted in print copy by the date specified.** Provide a clear statement describing the institution's performance in terms of compliance with the standards/requirements of the Principles of Accreditation. Substantive comments concerning the institution's ability to comply or to continue to comply must be supported by accompanying and appropriate documentation. The Commission does not consider unsupported comments to be substantive, and only substantive comments will be forwarded to the institution for response or included in the report.

Please submit two copies of the completed form and attachments. Refer to the Commission policy, "Third-Party Comment by the Public," for a description of the process for reviewing formal comments.

I. INFORMATION ABOUT THE INDIVIDUAL FILING

A. First Name:

M.I.

Last Name:

B. Street Address:

C. City:

State:

Zip Code:

Country: (If outside of USA)

D. Telephone Number:

Fax Number:

E. Email Address:

F. Name of College or University Named in the Third-Party Comment

II. THIRD-PARTY COMMENT INFORMATION

- A. Provide a clear statement describing the institution's performance in terms of compliance with the Commission's standards for accreditation, the *Principles of Accreditation*.

- B. Describe the documentation produced to support your comments.

In order to have the comment(s) forwarded to the institution, all the boxes below must be checked and you must sign and date the submission.

- I have read the "Third-Party Comment by the Public" and agree this form constitutes my formal comments.
- I understand that the Commission: (1) does not intervene in the internal procedures of institutions or perform as a regulatory body, (2) is not a formal adjudicatory or grievance-resolving body, and (3) will not serve as a grievance panel when the outcome of an institutional grievance or process is unsatisfactory.
- I authorize the Commission on Colleges to submit my comments and any additional documents to the involved institution(s).
- I certify that I am not currently employed by the institution nor a student enrolled at the institution.
- I hereby certify that all of the information I have given above is true and complete to the best of my knowledge.

YOUR SIGNATURE: _____ **DATE:** _____