



Dr. Jonathan Veitch
President
Occidental College
1600 Campus Road
Los Angeles, CA 90041-3314

SEP 27 2017

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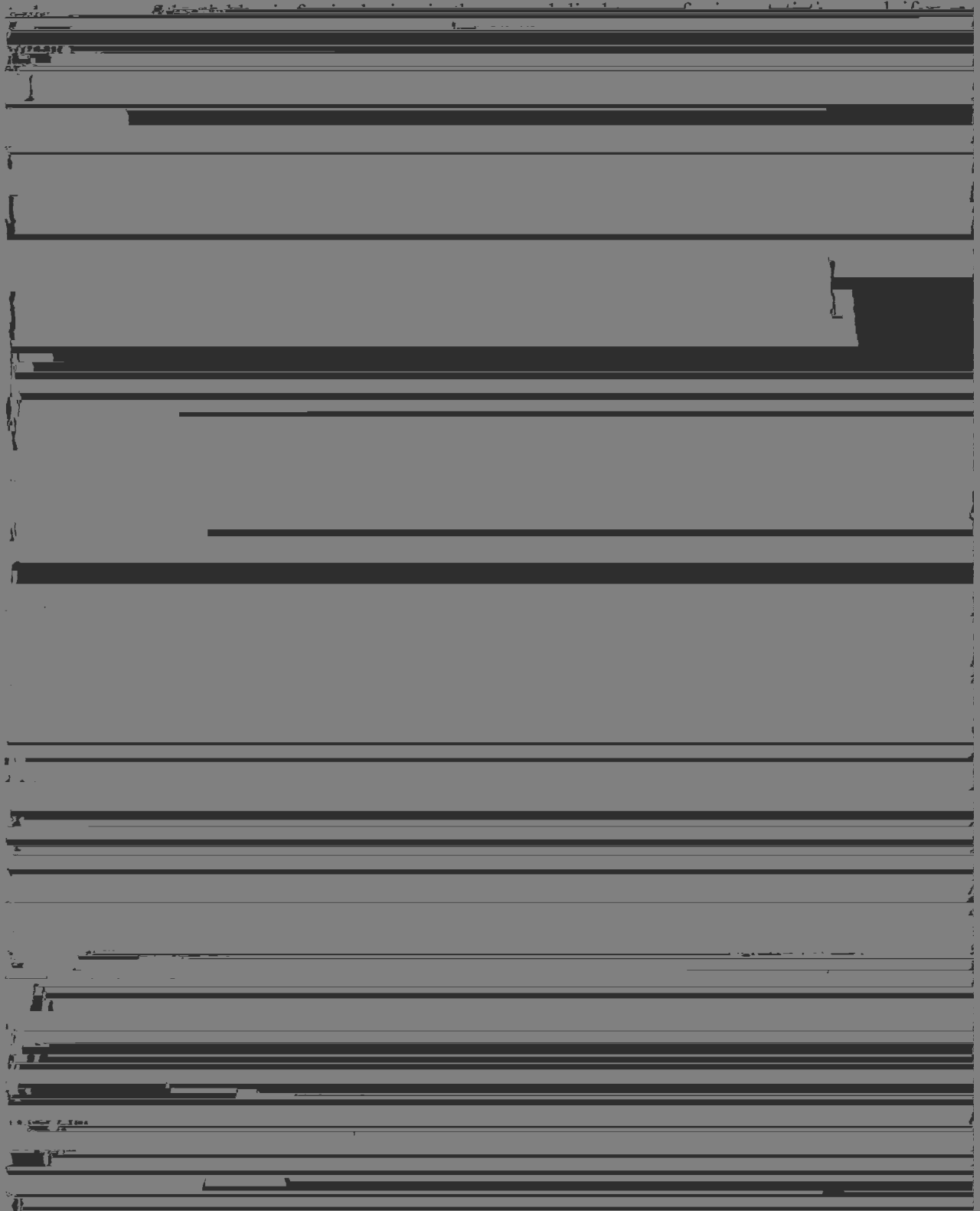
Dear Dr. Veitch

This letter is to inform you that the U.S. Department of Education (Department) intends to fine Occidental College (Occidental; the College) a total of \$83,000 based on the violations of statutory and regulatory requirements outlined below. This fine action is taken in accordance with the procedures that the Secretary of Education (Secretary) has established for assessing

[REDACTED]

¹ The maximum fine amount cited in 34 C.F.R. § 668.84(a) was increased from \$27,500 to \$35,000 effective October 2, 2012 by final regulations issued by the Department on October 2, 2012, 77 Fed. Reg. 60047. This fine

[REDACTED]



2016. After reviewing all of the information provided by Occidental, the Department issued its

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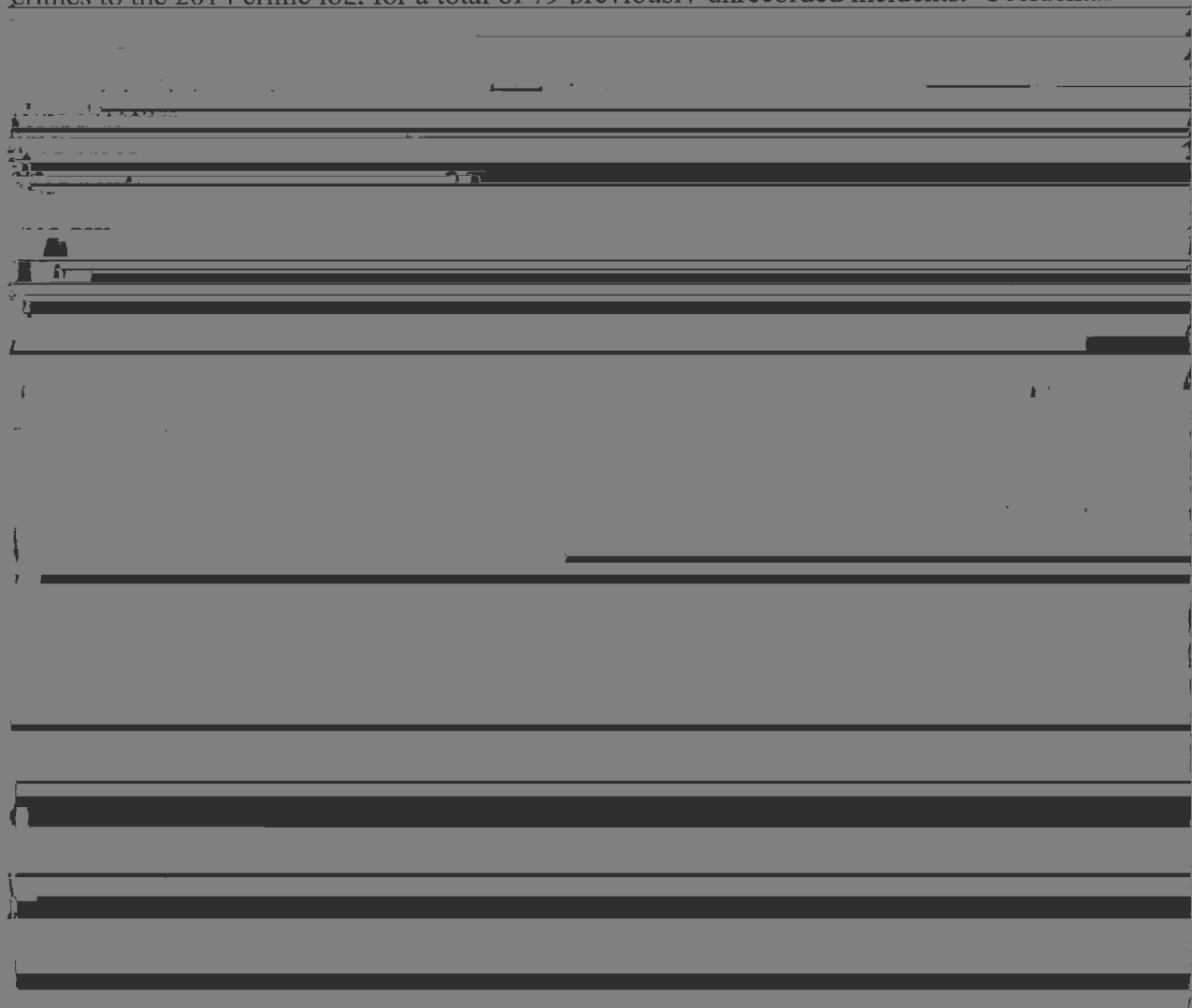
Final Program Review Determination (FPRD) letter to Occidental on August 11, 2017. The FPRD is incorporated by reference into this fine action. (Enclosure 1).

The Department is taking this fine action based on the findings in the FPRD, which concluded that Occidental failed to maintain an accurate and complete daily crime log for 2012, 2013, and

[REDACTED]

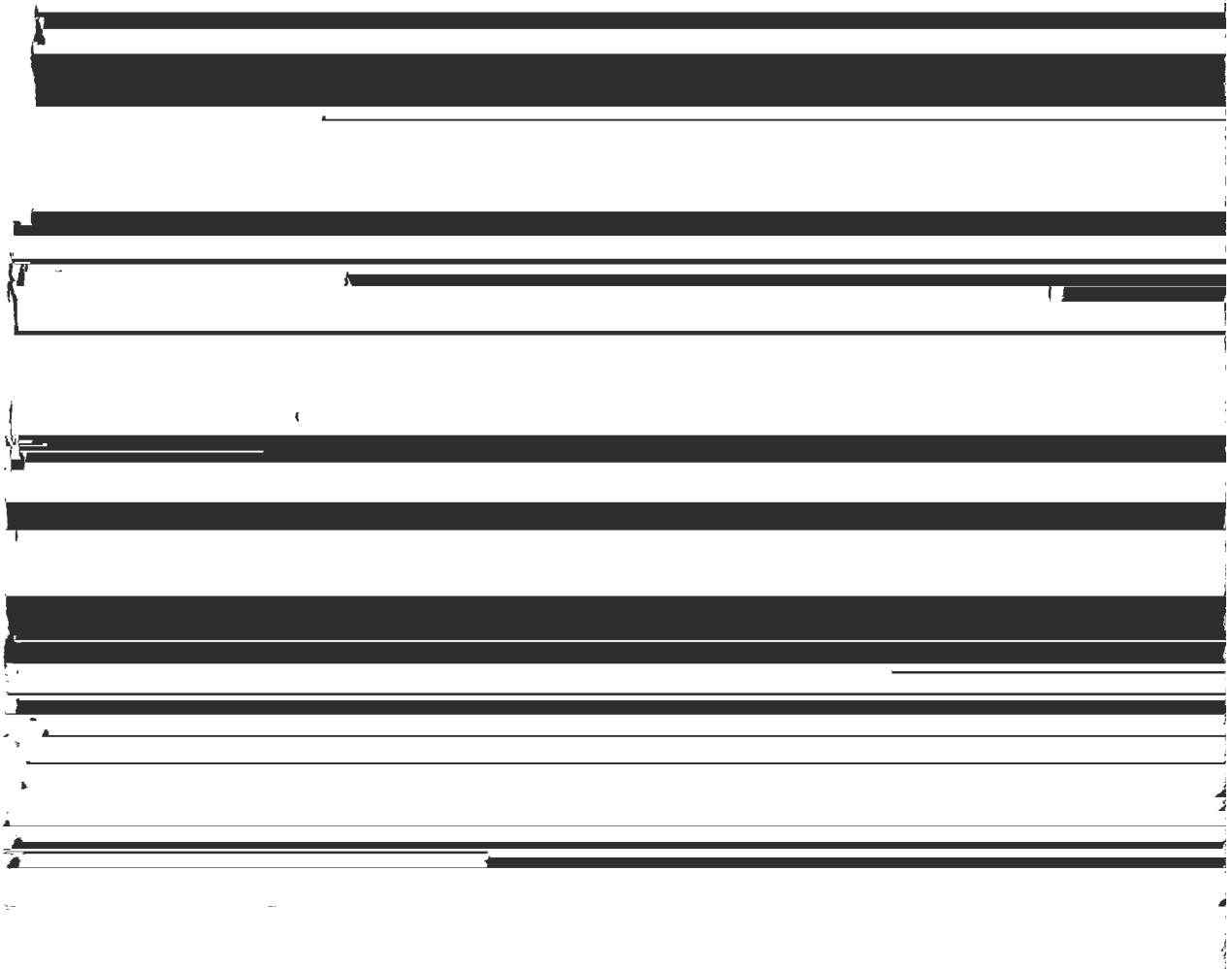
- Sixteen (16) disturbance responses,
- Two (2) vandalisms,
- Two (2) burglaries from auto vehicles,
- One (1) alcohol violation,
- One (1) property damage,
- One (1) arson (other),
- One (1) Information / child endangerment,
- One (1) trespassing, and
- One (1) harassment.

In its responses to the Department, Occidental noted that, in reconstructing its daily crime logs, it identified and added 36 crimes to the 2012 crime log, 31 crimes to the 2013 crime log, and 12 crimes to the 2014 crime log. for a total of 79 previously-unrecorded incidents. Occidental



the annual disclosure of crime statistics, and, if so, a description of those policies and procedures.

2. A statement of policy concerning the monitoring and recording through local police agencies of criminal activity by students at noncampus locations of student organizations officially recognized by the institution.
3. A description of the College's drug and alcohol abuse education programs, as required under section 120(a) through (d) of the HEA.
4. A statement of policy regarding the institution's campus sexual assault programs



designed to prevent sex offenses and a description of its educational programs to promote awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses.

5. A clear statement regarding how interested parties can access state sex offender registry information.
6. A statement of policy regarding its emergency response and evacuation procedures. The statement must include, among other things: the procedures the institution will use to

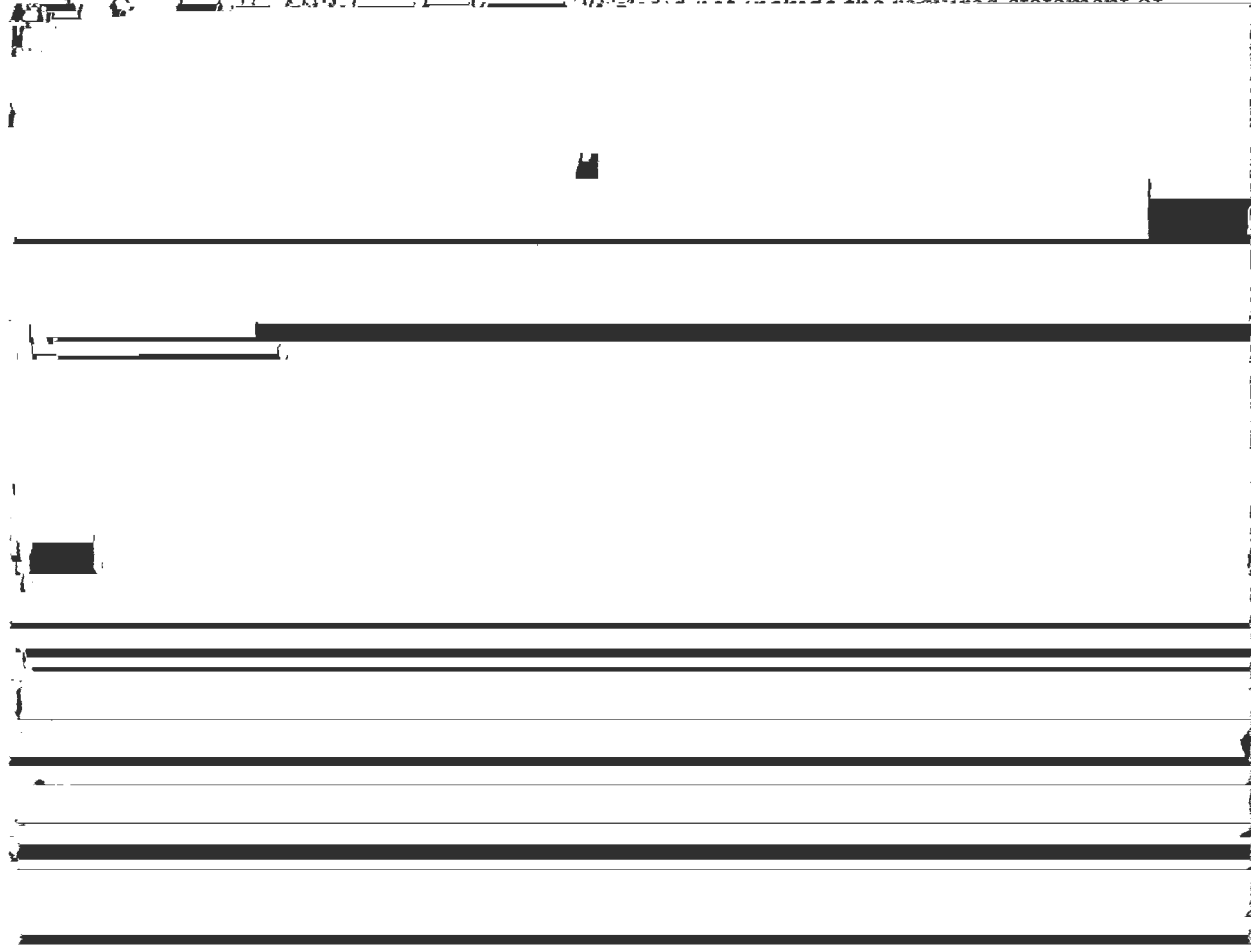
B. ASR FOR CALENDAR YEAR 2013

Occidental's ASR for calendar year 2013 did not contain the following required statements of policy

1. A statement whether the institution has any policies or procedures that allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, and, if so, a description of those policies and procedures.
2. A clear statement regarding how interested parties can access state sex offender registry information.

C. ASR FOR CALENDAR YEAR 2014

Occidental's ASR for calendar year 2014 did not include the required statement of



current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the

In its response to the PRR, the College conceded that it did not collect and report crime statistics from all its CSAs and claimed that it had taken corrective action. Current students and

[REDACTED]

review team found that the College merely sent an e-mail message to students and employees that asked them to read the Handbook and to acknowledge that they have done so. The message also asked students and employees to comply with the policies and procedures in the handbooks. The College did not demonstrate that this process was at all effective in distributing the policies to students and employees. Moreover, Occidental did not conduct the required biennial reviews of the College's DAAPP to evaluate its effectiveness and produce a report of findings. While the review team noted that Occidental did produce biennial review reports in 2009 and 2013, neither report demonstrated any attempt to actually measure the effectiveness of the College's DAAPP



the Department indicates that the median funding level for institutions participating in the Federal Pell Grant program is \$1,540,305, for institutions participating in the Federal Direct Loan programs, the median funding level is \$2,108,926, and for institutions participating in the
Campus-Based programs the median funding level is \$271,061. Occidental is a large institution

[REDACTED]

because its funding levels for Federal Pell Grants, Federal Direct Loans, and Campus-Based funds exceed the median funding levels for those Title IV HEA programs

III.

I have assessed \$27,500 for Occidental's failure to collect crime statistics from all CSAs for the 2012 and 2013 ASRs. Occidental's failure to meet its legal obligations means that the crime statistics provided in the 2012 and 2013 ASRs and the statistics provided to the Department did not include all Clery-reportable crimes. This is a serious violation because the 2012 and 2013 ASRs could not have accurate crime statistics when Occidental failed to collect crime statistics

[REDACTED]

Signature Redacted