



**VIA E-MAIL**

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**Re: Civil Rights Violations at Brooklyn College**

**I. Introduction**

Jewish students have been subjected to a hostile environment in the Mental Health Counseling master's program ("MHC program") at Brooklyn College ("BC" or "the College") since the beginning of the 2020-2021 academic year. In class lectures and course materials, professors have maligned Jews on the basis of race and ethnic identity by advancing the narrative that all Jews are white and privileged and therefore contribute to the systemic oppression of people of color. Jewish students in the MHC program have also been bullied and harassed in class discussions and on social media by student peers, who target Jewish students using the same ethnic stereotypes, anti-Semitic tropes and divisive concepts that faculty members promote in their courses.

Jewish students who challenged these divisive narratives or shared their distress about the anti-Jewish hostility in the MHC program were met with further harassment and intimidation from faculty and administrators, who told students to "get your whiteness in check" and to "keep your head down" rather than challenge the status quo.

The severe and persistent harassment of Jewish students in the MHC program on the basis of their race and ethnicity has created a hostile climate. In this hostile environment, Jewish students are afraid that if they express their views in class or to their peers, they will be further disparaged and harassed by their professors and other students. Class participation is not only a requirement in many first-year courses, but is also an important opportunity for budding mental health counselors to develop their interpersonal and professional communication skills. By preventing students from fully participating in their classes, the hostile environment in the MHC program has prevented Jewish students from obtaining the full benefits of the program.

Although BC is aware of the discriminatory harassment and hostile climate for Jewish students in the MHC program, the College has not taken prompt and effective steps to end the harassment or eliminate that hostile environment. As a result of BC's failure to redress the discrimination that has occurred in

the MHC program, Jewish students in that program have been denied an educational opportunity in violation of Title VI.

For the foregoing reasons, the Louis D. Brandeis For Human Rights Under Law (the Brandeis Center) requests that: (1) the U.S. Education Department's Office for Civil Rights (OCR) initiate an investigation of BC, a recipient of federal financial assistance,<sup>1</sup> for violations of Title VI of the Civil Rights Act of 1964 (Title VI) and the statute's implementing regulations; and (2) that OCR require BC to come into compliance with Title VI by implementing the remedies suggested in Part IV, *infra*, of this Complaint.

## II. Statement of Facts

Jewish students in their first year attending BC's MHC program, have been subjected to a hostile environment in that program since the beginning of the 2020-2021 academic year. These Jewish students include [REDACTED] Doe 1 and [REDACTED] Doe 2. [REDACTED] Doe 2 is a Hispanic woman of color.<sup>2</sup>

On or about August 27, 2020, [REDACTED] Doe 2 was present in a class taught by [REDACTED] [REDACTED] (Professor [REDACTED]) when the Professor stated, in sum and substance, that Ashkenazi Jews who immigrated to America have become part of the oppressors in this country. In another class during September of 2020, [REDACTED] Doe 1 and [REDACTED] Doe 2 were present when Professor [REDACTED] stated words to the effect of, white people created the concept of professionalism to oppress people of color. During a subsequent class that [REDACTED] Doe 1 and [REDACTED] 2 attended in September 2020, a Jewish student voiced its concern about Professor [REDACTED] previous comments pertaining to "white" people; the Jewish student explained that the Professor's comments made the student uncomfortable because it appeared the Professor was suggesting that "white" people should feel bad or guilty about their race. Professor [REDACTED] responded to the student in front of the entire class, stating, in sum and substance that because the student was white and privileged, the student could not understand the perspective that the Professor described. Professor [REDACTED] further told the Jewish student words to the effect of, get your whiteness in check.

Also in September 2020, during another required first year course, [REDACTED] professor [REDACTED] [REDACTED] (Professor [REDACTED]) instructed students to discuss and rank their identities. [REDACTED] Doe 1 shared with a group of students in the class that because [REDACTED] identifies strongly with [REDACTED] Jewish identity and does not feel an affinity for "white" identity, [REDACTED] ranked [REDACTED] Jewish identity first and "white" identity last. Students responded by suggesting that [REDACTED] Doe 1's white identity should have figured more prominently in [REDACTED] identity ranking. The students insisted that because [REDACTED] Doe 1 was white and part of the dominant culture, [REDACTED] did not understand oppression and therefore incorrectly ranked [REDACTED] identities.

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<sup>1</sup> See, e.g., *Financial Aid Information Guides*, BROOKLYN COLLEGE, available at <http://www.brooklyn.cuny.edu/web/about/offices/financial/guides.php> (last visited Feb. 25, 2021).

<sup>2</sup> Upon request, we will supply the names of witnesses who have requested confidentiality.

Shortly after classes began, several students began targeting and bullying Jewish students on the basis of their race and ethnicity in a WhatsApp group chat. Many first-year students in the MHC program, including [REDACTED] Doe 1 and [REDACTED] Doe 2, have been participating in the WhatsApp text messaging chat group as a means of furthering communication and discussion outside the classroom about issues of interest pertaining to the MHC program. In or around September 2020, during a disagreement between students about Martin Luther King, Jr., and Sigmund Freud, one student expressed [REDACTED] desire to strangle a Jewish student with whom [REDACTED] disagreed. The student texted the following message to the Jewish student: "I wanna strangle that [named Jewish student] ho." Two other students in the chat group expressed their support of the threatening text message. When [REDACTED] Doe 1 voiced [REDACTED] discomfort about issuing threats, the student who made the threat attacked [REDACTED] Doe by accusing [REDACTED] of being racist, claiming [REDACTED] Doe 1 was "part of the dominant culture" of "white people" who "continue to perpetuate power structures."

On or about September 16, 2020, [REDACTED] Doe 2 spoke to the [REDACTED] of the Graduate Program in Mental Health Counseling, [REDACTED] [REDACTED] and shared [REDACTED] concerns about the bullying and harassment that Jewish students were experiencing in the MHC program. In response, [REDACTED] [REDACTED] stated, in sum and substance, that white students like [REDACTED] Doe 2 should keep quiet and keep their heads down. When [REDACTED] Doe 2 told [REDACTED] [REDACTED] that [REDACTED] is a person of color, [REDACTED] [REDACTED] stated words to the effect of, your skin color won't save you, implying that because [REDACTED] Doe 2 was Jewish [REDACTED] was considered "white."

On or about September 21, 2020, all first-year students were required to attend a presentation about "anti-oppression processing" to address "[i]ssues of identity and privilege." During the event, Jewish students asked administrators to establish ground rules prohibiting bullying and threats in the WhatsApp group chats. The student who had previously threatened to strangle the Jewish student on WhatsApp stated, in sum and substance, that [REDACTED] opposed ground rules because racism needs to be condemned.

In late September 2020, [REDACTED] [REDACTED] emailed first year MHC students about "First-Year Cohort Tensions," and acknowledged that the College was aware of the ongoing frictions among students in the MHC program, stating: "I'm hearing many reports of continuing first-year cohort tensions this week concerning identity, oppression and privilege." While [REDACTED] [REDACTED] explicitly expressed the administration's support for "BIPOC students, who are most vulnerable, having most directly experienced the impacts of oppression," [REDACTED] did not address the harassment of Jewish students by faculty and students or the anti-Jewish hostility in the MHC program.

On or about November 11, 2020, [REDACTED] Doe 2, a Jewish Hispanic woman of color, told Professor [REDACTED] that [REDACTED] was distressed by a group chat in which [REDACTED] was attacked by other students. In response, Professor [REDACTED] encouraged [REDACTED] Doe 2 to leave the group chat if [REDACTED] felt unsafe and further stated: "Those of us who enjoy the privileges of whiteness, cisgender, heterosexuality [sic], able bodiedness [sic], middle to upper SES, intact families [sic], etc have to become increasingly humble and sensitive to how our privileges are perceived."

On or about November 24, 2020, Professor ██████ gave students in ██████ class an assignment on “Racial Identity Development” that required students to choose and complete a worksheet “that most aligns with your own ethnic identity.” While the assignment provided worksheets for an array of identities including Asian American, Black/African American, LatinX, Biracial, Transracial/Transnational Adoptee Development, and White, it did not include a separate worksheet for Jewish identity. The only reference to Jewish identity in any of the worksheets was in the worksheet for “White Racial Identity Development.” Further, only the worksheet for white racial identity development required a person to consider the “abandonment of racism” as a phase in their identity development; and in the context of that phase, the worksheet implied that white identity and the privilege that flows from it overshadow other identities such as being “poor, lgbt, *Jewish*, a woman, without a HS/BA degree, disabled” (emphasis added). During a subsequent classroom discussion about this assignment, ██████ Doe 1 stated that ██████ was uncomfortable identifying ██████ as having “white privilege” in the worksheet. Other students responded to ██████ Doe 1 by stating, in sum and substance, that the worksheet showed that ██████ was in denial about ██████ privilege.

In December of 2020, a Jewish student shared its concerns with a MHC program administrator about the hostility directed at Jews and white students in the program. The administrator responded by telling the Jewish student words to the effect of, keep your head down. When the Jewish student expressed to the administrator its view that Jews should not have to identify as “white,” the administrator stated words to the effect of, that’s never going to happen.

In addition to categorizing all Jews, including Jewish students in the program, as “white,” courses in the MHC program assigned readings to first-year students that depicted white people as privileged members of an inherently racist society that white people benefit from. The following excerpt from an assigned reading is exemplary: “...in order to effectively address the pertinent issues, the racialized privileges afforded to the current White majority in American society, such as a priori suppositions of normality, must be dismantled.”<sup>3</sup>

Class participation by students in their first-year MHC courses is a requirement and substantial component of a student’s final grade in many first-year courses; it is also an important component of the educational experience for budding mental health professionals in the MHC program. For example, Professor ██████ course syllabus for ██████, Fall 2020, states that, “This is an interactive course, and learning is enhanced when everyone participates *to their fullest*. Participation will count towards 20% of the final grade” (emphasis added). Professor ██████ syllabus for ██████ Fall 2020, states that class participation constitutes 25% of a student’s total grade, and that, “As a graduate student you are expected to actively participate in every class.”

Due to the persistent and severe harassment and intimidation they have experienced and witnessed, Jewish students in the MHC program, including ██████ Doe 1 and ██████ Doe 2, feel unsafe fully expressing their viewpoints in class and have refrained from doing so.

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<sup>3</sup> Dena Phillips Swanson, et al., *Psychosocial development in racially and ethnically diverse youth: Conceptual and methodological challenges in the 21<sup>st</sup> century*, DEVELOPMENT AND PSYCHOPATHOLOGY, Vol. 15, Issue 3 (Aug. 2003) at 743.

On or about December 17, 2020, [REDACTED] Doe 1 informed the [REDACTED] of the MHC program, [REDACTED] [REDACTED] that [REDACTED] has been bullied so severely and persistently by another student that [REDACTED] is too afraid to speak up in class and has considered transferring to another school. Although [REDACTED] [REDACTED] told [REDACTED] Doe 1 that the College “plan[s] to enforce appropriate limits on any inappropriate, intimidating behavior,” the College has not followed up with [REDACTED] Doe 1 or taken steps to end the harassment of Jewish students and eliminate the hostile environment in the MHC program.

### III. BC Violated Title VI of the Civil Rights Act of 1964.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in educational institutions that receive federal funding.<sup>4</sup> Harassment creates a “hostile environment” for purposes of Title VI when it “is sufficiently severe, pervasive, or persistent so as to interfere with or limit a student’s ability to participate in or benefit from the services, activities, or opportunities offered by a school.”<sup>5</sup> A Title VI recipient “*must* take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment, and prevent the harassment from recurring.”<sup>6</sup> Further, OCR has explained that a university can violate Title VI if peer harassment “is sufficiently serious that it creates a hostile environment and such harassment is encouraged, tolerated, not adequately addressed, or ignored by school employees.”<sup>7</sup>

Guidance issued by the OCR and DOJ since 2004 has extended protections under Title VI to cover discrimination against Jews on the basis of their “actual or perceived shared ancestry or ethnic characteristics.”<sup>8</sup> As recently clarified in Executive Order 13899 (the Executive Order), Title VI must be enforced “against prohibited forms of discrimination rooted in anti-Semitism as vigorously as

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<sup>4</sup> See 42 U.S.C. § 2000d *et seq.*

<sup>5</sup> See Russlynn Ali, “Dear Colleague Letter” at 2, U.S. DEP’T EDUC.–OFFICE FOR C.R. (Oct. 26, 2010) [hereinafter 2010 Dear Colleague Letter], <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.pdf> (“[Under Title VI, a] school is responsible for addressing harassment incidents about which it knows or reasonably should have known”).

<sup>6</sup> 2010 “Dear Colleague Letter,” *supra* note 7, at 2-3.

<sup>7</sup> 2010 “Dear Colleague Letter,” *supra* note 8, at 1.

<sup>8</sup> See, e.g., 2010 “Dear Colleague Letter” at 5; See 2010 Dear Colleague Letter, *supra* note 4, at 5; see also Letter from Thomas E. Perez, Assistant Att’y Gen., U.S. DEP’T OF JUST.–C.R. DIV., to Russlyn H. Ali, Assistant Sec’y for C.R., U.S. DEP’T OF EDUC.–OFFICE FOR C.R., Re: Title VI and Coverage of Religiously Identifiable Groups, (Sept. 8, 2010), [https://www.justice.gov/sites/default/files/crt/legacy/2011/05/04/090810\\_AAG\\_Perez\\_Letter\\_to\\_Ed\\_OCR\\_Title%20VI\\_and\\_Religiously\\_Identifiable\\_Groups.pdf](https://www.justice.gov/sites/default/files/crt/legacy/2011/05/04/090810_AAG_Perez_Letter_to_Ed_OCR_Title%20VI_and_Religiously_Identifiable_Groups.pdf); see also Kenneth L. Marcus, *Title VI and Title IX Religious Discrimination in Schools and Colleges: Dear Colleague Letter*, U.S. DEP’T OF EDUC.–OFFICE FOR C. R. (Sep. 13, 2004), <https://www2.ed.gov/about/offices/list/ocr/religious-rights2004.html>.

against all other forms of discrimination prohibited by Title VI.”<sup>9</sup> Further, the Executive Order directs the Department of Education to refer to the International Holocaust Remembrance Alliance working definition of antisemitism (the IHRA Definition) and its contemporary examples, when investigating allegations of anti-Semitism under Title VI.<sup>10</sup>

In this case, Jewish students in the MHC program, including [REDACTED] Doe 1 and [REDACTED] Doe 2, were subjected to discriminatory harassment on the basis of their “actual or perceived” Jewish ethnic characteristics, as well as on the basis of their perceived race, in violation of Title VI. The Executive Order is particularly relevant here, where the unlawful harassment was motivated by anti-Semitic bias. The IHRA Definition and, more specifically, the contemporary examples it cites, provide helpful guidance for understanding why the anti-Semitic harassment directed at Jewish students in the MHC program was targeted, intentional, and discriminatory intimidation on the basis of their Jewish ethnic identity.

By advancing the racist and ethnic stereotype that all Jews are “white” and “privileged” and therefore oppress people of color, faculty members, students and course assignments in the MHC program thereby invoke the classical anti-Semitic trope that Jews possess disproportionate power and influence in society, which they use for nefarious purposes against non-Jews, while also subjecting them to racial stereotypes about “whites.”<sup>11</sup>

Further, by advancing the anti-Semitic ethnic stereotype that all Jews, including Jewish students like [REDACTED] Doe 2, who is a Hispanic woman of color, are “white,” faculty, students and course materials in the MHC program are perpetuating an age-old anti-Semitic perspective that changes its perception of Jewish skin color depending on the nature of the perceiver’s prejudice.<sup>12</sup>

The severity and persistence of the discriminatory harassment against Jewish students in the MHC program, by faculty, students and course materials, has coalesced to create a hostile climate for Jews in the program and against others perceived to be “white.” After a Jewish student was threatened in a WhatsApp group chat with bodily harm and another Jewish student was demonized as a “white” racist for coming to the victim’s defense, Jewish students, including [REDACTED] Doe, were shaken and intimidated. After a Jewish student was publicly castigated and told to “check” [REDACTED] “white privilege” because [REDACTED] candidly raised concerns about the Professor’s demonization of “white” people, Jewish students in the program were afraid that if they, too, spoke up they would be similarly maligned and ostracized. And

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<sup>9</sup> Exec. Order No. 13899 §1, 3 C.F.R. 68779-68780 (2019); *see also* “Questions and Answers on Executive Order 13899 (Combating Anti-Semitism and OCR’s Enforcement of Title VI of the Civil Rights Act of 1964,” U.S. DEP’T EDUC.–OFFICE FOR C.R. (Jan. 19, 2021) <https://www2.ed.gov/about/offices/list/ocr/docs/qa-titleix-anti-semitism-20210119.pdf>.

<sup>10</sup> *See* EO 13899 §2(a)(i) and (ii), *supra* note 9; *see also* INT’L HOLOCAUST REMEMBRANCE ALLIANCE, *Working Definition of Antisemitism*, <https://www.holocaustremembrance.com/working-definition-antisemitism> (last visited Nov. 26, 2020) [hereinafter IHRA Definition].

<sup>11</sup> *See* IHRA Definition, *supra* note 10.

<sup>12</sup> Kenneth L. Marcus, *JEWISH IDENTITY AND CIVIL RIGHTS IN AMERICA* (2010).

the pressure from faculty on Jewish students to keep their “heads down” and keep quiet about the harassment and hostility has ostracized Jewish students from the rest of their class and peers in the program.

In this hostile climate, Jewish students in the MHC program are so intimidated by the vilification and harassment coming from faculty and students that the Jewish students are afraid to speak up and fully express their views in class. Class participation is a requirement in many first-year courses and an integral component of the overall educational experience in the MHC program. By interfering with the ability of Jewish students to fully participate in their classes, the hostile environment and has thus deprived Jewish students of the ability to derive the full benefits of the MHC program and denied them an educational opportunity.

BC has been well aware of the ongoing anti-Semitic harassment taking place in classes and on social media, which has targeted Jewish students on the basis of their “actual or perceived shared ancestry or ethnic characteristics.” Indeed, the College is well aware that Jewish student are being bullied and harassed by peers, and demonized, ostracized and silenced by faculty. In addition to notifying Professor ██████ and Professor ██████ directly, ██████ Doe 2 and another Jewish student reported the ongoing harassment and hostility to the ██████ of the Graduate Program in Mental Health Counseling, ██████ ██████ Doe 1 also confided in the ██████ of the MHC program, ██████ ██████ and told ██████ that ██████ felt so unsafe after being bullied by other students that ██████ was contemplating leaving the program. ██████ ██████ also publicly acknowledged that ██████ was aware of ongoing tensions among first-year students in the MHC program.

And yet, BC has failed to take “prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring.”<sup>13</sup> BC has failed to publicly condemn the bullying and harassment of Jewish students by their peers on social media or to protect Jewish students who feel unsafe due to the hostility targeting them in the MHC program. Although the ██████ of the program acknowledged first-year “tensions,” and expressed ██████ support of BIPOC students, ██████ has failed to condemn or otherwise address the targeted harassment of Jewish students in the MHC program.

Under Title VI, a university must respond to discriminatory harassment when such harassment “negatively affected the ability and willingness of Jewish students to participate fully in the school’s education programs and activities.”<sup>14</sup> In this case, the College did not take steps to ameliorate the harassment targeting Jewish students that prevented those students from feeling safe in the program and prevented them from fully participate in their classes. To this day, Jewish students in the program are too intimidated and afraid to speak up in class and participate fully in classroom discussions. As a result, Jewish students have been unlawfully denied an educational opportunity in the MHC program.

For the foregoing reasons, BC has violated Title VI.

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<sup>13</sup> 2010 “Dear Colleague Letter,” *supra* note 7, at 2-3.

<sup>14</sup> 2010 “Dear Colleague Letter,” *supra* note 7, at 5–6.

**IV. Suggested Remedies: OCR should require BC to come into compliance with Title VI by eliminating the hostile environment and its effects for Jewish students in the MHC program.**

In light of BC's failure to take steps to eliminate the hostile atmosphere against Jews in the MHC program and its effects on Jewish students, OCR should require BC to take the following steps to come into compliance with Title VI.

**a. BC and the MHC program must adopt the IHRA working definition of antisemitism and its contemporary examples.**

BC and the MHC program must issue a public statement announcing that they will officially adopt and utilize the IHRA Definition and its contemporary examples when investigating and responding to incidents of harassment and discrimination at BC, including in the MHC program, to determine whether they are motivated by anti-Semitic animus or bias. BC must further state that it encourages the entire BC community, including students, faculty and administrators in the MHC program, to educate themselves about the many manifestations of anti-Semitism by reading and studying the IHRA Definition and its contemporary examples.

**b. BC and the MHC program must issue a public statement condemning anti-Semitism.**

BC and the MHC program must issue a public statement condemning all forms of anti-Semitism and anti-Semitic harassment, including anti-Semitism that targets Jews on the basis of race and Jewish ethnicity. The statement must further condemn the pervasive anti-Semitic harassment and bias in the MHC program perpetrated by faculty and students that targeted Jewish students on the basis of their Jewish ethnic identity. Such statement must also include a commitment by BC and the MHC program to respond to anti-Semitic incidents at BC just as they would respond to other forms of bigotry; this response should include, where appropriate, educational and training programs addressing the many manifestations of anti-Semitism and utilizing the IHRA Definition and its contemporary examples. We strongly urge BC to use or model its statement on the following language:

We condemn anti-Semitism in all its forms. Members of our student community have been subjected to anti-Semitic harassment and intimidation in the Mental Health and Counseling Masters program (MHC program) on the basis of their race and Jewish ethnic identity. Targeting any member of our community in this manner is unacceptable and is contrary to our university's basic values of mutual respect and inclusion. Our College must be a place for the free and open exchange of ideas. It is never acceptable to harass, intimidate, marginalize, exclude or demonize any part of our community on the basis of its identity.



BC and the MHC program are committed to taking all necessary actions, including discipline where appropriate, to address and ameliorate anti-Semitic discrimination and harassment based on shared ancestry or ethnic characteristics as well as on the basis of perceived race. To that end, BC and the MHC program will utilize the IHRA working Definition of antisemitism when investigating and responding to incidents of harassment and discrimination to determine whether they are motivated by anti-Semitic animus or bias. The College encourages the entire BC community to educate itself about the many manifestations of anti-Semitism by reading and studying the IHRA Definition and its contemporary examples.

- c. BC must revise its nondiscrimination policy to include a prohibition on discrimination based on actual or perceived shared ancestry and ethnicity including anti-Semitism as defined in Executive Order 13899 and, more specifically, in the IHRA working definition of antisemitism and IHRA's contemporary examples.**

BC must revise its nondiscrimination policy to include a prohibition on discrimination based on actual or perceived shared ancestry and ethnic characteristics including anti-Semitism as defined in Executive Order 13899 and, more specifically, in the IHRA working Definition and IHRA's contemporary examples of anti-Semitism.<sup>15</sup> The revised policy should include a description of the forms of anti-Semitism that can manifest in the University environment and provide examples of discrimination on the basis of shared ancestry and ethnic characteristics, which must include the contemporary examples of anti-Semitism in the IHRA Definition.

- d. BC must conduct mandatory training for the entire BC community, including the MHC program, regarding its revised nondiscrimination policies, that includes a specific focus on the different manifestation of anti-Semitism and national-origin discrimination.**

BC must conduct training for the BC community, including students, faculty, staff, and administrators in the MHC program and the larger BC community, concerning the revised nondiscrimination policies and their implementation. Such training must (1) include programming and educational materials about national origin discrimination and harassment, which specifically address the many manifestations of anti-Semitism, and (2) incorporate the IHRA working Definition and its contemporary examples.

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<sup>15</sup> See "The City University of New York policy on equal opportunity and non-discrimination," available at [https://www.brooklyn.cuny.edu/web/off\\_diversity/CUNY-Policy-on-Equal-Opportunity-and-Non-Discrimination.pdf](https://www.brooklyn.cuny.edu/web/off_diversity/CUNY-Policy-on-Equal-Opportunity-and-Non-Discrimination.pdf).

- e. **BC must develop policies and procedures to prevent the use of adverse racial stereotypes and provide training to members of the BC community on those policies.**

BC must develop policies and procedures to prevent the use of adverse racial stereotypes and provide training on these policies and procedures to members of the BC community, including administrators, faculty, other staff and students.

- f. **BC must create a Task Force to review, address and improve the atmosphere for Jewish students within the MHC program.**

BC must create a Task Force that will provide input to the administration and directors of the MHC program about how to respond to anti-Semitic incidents at BC and in the MHC program.

## V. Conclusion

For the foregoing reasons, the Brandeis Center strongly urges investigation into BC's compliance with Title VI.

Respectfully,



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