

Mills College

Human Resources

College Discrimination Policy & Procedures

<u>Statement of Purpose</u>	<u>Conduct Standards under Law</u>
<u>Racial Harassment Definition</u>	<u>Sexual Harassment Definition</u>
<u>Grievance Board</u>	<u>Summary of Grievance Procedure</u>
<u>Guidelines for Administrative Complaints</u>	<u>Employment Complaints</u>
<u>Confidentiality</u>	<u>Retaliation</u>
<u>Formal Complaints</u>	<u>Recordkeeping</u>

I. Statement of Purpose

Mills College is committed to maintaining a learning, residential and working environment congenial to the intellectual, professional, personal and social development of all members of its community -- students, faculty and staff. The harm caused by unlawful discrimination has no place in such an environment.

In compliance with various federal, state and local laws, the College has prohibited discrimination based on race, creed, age, national origin, sexual orientation, disability or handicap to protect participants in its education, employment and other College programs. It also has banned sex discrimination in its graduate and employment programs.

To enforce these prohibitions, the College hereby adopts the following discrimination policy and procedure to govern the conduct of all campus members and to provide relief for victims of discrimination. This policy and procedure is meant to govern all forms of discrimination and harassment complaints.

The guidelines provided by this policy and procedure are not meant to create any contractual rights or obligations.

[Back to menu](#)

II. Conduct Standards under Law

Laws to be Enforced.

- Various federal, state and local laws, as well as College policy, prohibit differential treatment or harassment of students, faculty, employees and other College program beneficiaries on the basis of race, color, national origin, religion, sex, sexual orientation, disability and age. Some of the relevant laws are:
- Section 504 of the Rehabilitation Act of 1973 and Titles I and III of the Americans with Disabilities Act of 1990 prohibit discrimination against students, employees and

other participants in College programs with physical or mental disabilities.

- Title VI of the Civil Rights Act of 1964 prohibits the College, in its status as the recipient of federal assistance, from operating its education programs in a way that discriminates on the basis of race, color, religion and national origin.
- Title VII of the Civil Rights Act of 1964 prohibits employment discrimination on the basis of race, color, religion, national origin and sex.
- Title IX of the Education Amendments of 1972 prohibits discrimination in education programs against students and employees on the basis of sex.
- The Equal Pay Act of 1963, as amended by the Education Amendments of 1972, prohibits discrimination in salaries and fringe benefits on the basis of sex.
- The Age Discrimination in Employment Act of 1967 prohibits job discrimination on the basis of age, and the Age Discrimination Act of 1975 prohibits discrimination against students on the basis of age.
- California's Fair Employment and Housing Act prohibits discrimination in employment, housing and public accommodations on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex or age.
- A 1992 amendment of California's Labor Code prohibits discrimination or different treatment in any aspect of employment or opportunity for employment based on actual or perceived sexual orientation.
- California's Tom Bane Civil Rights Act guarantees the right of all persons in the state to be free from violence or intimidation by threat of violence because of their race, color, religion, ancestry, national origin, political affiliation, sex, sexual orientation, age, disability or position in a labor dispute.
- A 1984 Oakland ordinance (Article 20, Section 3-20.01 et seq.) prohibits discrimination on the basis of sexual orientation in employment and the availability of services from business establishments and facilities supported by the City of Oakland.

The definitions of discrimination established under these laws shall guide the College in assessing the merits of complaints brought under this procedure. Complaints of racial harassment and sexual harassment shall be assessed under the separate definitions set forth below.

[Back to menu](#)

III. Racial Harassment Definition

Definition. Conduct directed against any person or group of persons because of their race, color, national origin or ethnic origin will be considered **racial harassment** when:

- the conduct denies opportunities or benefits on the basis of race, color, national origin or ethnic origin; or
- the conduct is part of a pattern that creates an intimidating, hostile or offensive educational or work environment.

Explanation. In determining whether allegations in a complaint fit within this definition, the standard shall be the perspective of a reasonable person within the campus community. Rules of common sense shall prevail. The rights of the individual charged with racial harassment shall be safeguarded by investigating and evaluating complaints with careful attention to the specific facts and context of the challenged conduct.

Racial harassment under this definition has no racial or ethnic limitations. Racial harassment can occur between members of different races or ethnicity or the same race or ethnicity. In general it is inappropriate for members of an education community to undermine the bond of trust that should exist within an educational institution by actions that systematically assault the self-esteem of its members or their respect for one another.

Racial harassment can occur between peers (co-students or co-workers), as well as between persons in relationships of unequal power. The potential for creating an atmosphere of fear and intimidation is greater in relationships where such inequalities of power exist.

A hostile environment is created by harassment that is sufficiently severe, pervasive or persistent to interfere with an individual's ability to learn, work or otherwise participate in College programs. In most cases, a pattern of incidents is required; allegations of casual or sporadic incidents are not enough to show a hostile environment. However, there is an inverse relationship between the severity of an alleged incident and the requirement of pervasiveness or persistence. Thus a single incident, such as injury to persons or property or the threat of such injury, could be sufficiently severe to create a hostile environment.

[Back to menu](#)

IV. Sexual Harassment Definition

Definition. Sexual advances, requests for sexual favors, or other forms of communication or physical contact of a sexual nature will be considered **sexual harassment** when:

- submission to or rejection of such conduct by an individual is used as a basis for academic or employment decisions affecting the individual; or
- such conduct has the effect of creating an intimidating, hostile, or offensive educational or work environment.

Explanation. In determining whether allegations in a complaint fit within this definition, the standard shall be the perspective of a reasonable person within the campus community. Rules of common sense shall prevail. The rights of the individual charged with sexual harassment shall be safeguarded by investigating and evaluating complaints with careful attention to the specific facts and context of the challenged conduct.

Sexual harassment under this definition has no gender limitations. Claimants and

individuals charged with sexual harassment can be either sex, and harassment can occur between members of different sexes or the same sex. In general it is inappropriate for members of an education community to undermine the bond of trust that should exist within an educational institution by actions that systematically assault the self-esteem of its members or their respect for one another.

Sexual harassment can occur between peers (co-students or co-workers), as well as between persons in relationships of unequal power. The potential for creating an atmosphere of fear and intimidation is greater in relationships where one person has authority over another. Relationships of unequal power may exist between faculty and student, graduate assistant and undergraduate, senior faculty and junior faculty, and supervisor and employee.

A hostile environment is created by harassment that is sufficiently severe, pervasive or persistent to interfere with an individual's ability to learn, work or otherwise participate in College programs. In most cases, a pattern of incidents is required; allegations of casual or sporadic incidents are not enough to show a hostile environment. However, there is an inverse relationship between the severity of an alleged incident and the requirement of pervasiveness or persistence. Thus a single incident, such as injury to persons or property or the threat of such injury, could be sufficiently severe to create a hostile environment.

Although Mills College does not police the private lives of its faculty and staff members, it expects them to avoid unprofessional behavior. In general, it is unprofessional of faculty and staff to break the bond of trust that exists between an educational institution and its students by pursuing romantic or sexual relationships with students. Faculty or staff members who engage in relationships that lead students to complain of sexual harassment could be subject to discipline.

[Back to menu](#)

V. Grievance Board

The College shall form a Grievance Board to hear formal complaints of discrimination and harassment. Three of the voting members of the Grievance Board shall be elected by their respective constituencies within the College community -- students, faculty and staff. In the same elections, alternates also shall be elected to represent students, faculty and staff. The College President, in consultation with the Faculty Executive Committee, shall select a fourth voting member from tenured faculty to serve as Chair of the Grievance Board for a term of two years. For each case, a fifth voting member shall be elected from among the alternates by the three members elected to the Board.

Except for the student member and alternate -- who shall be elected on a yearly basis -- elected Board members and alternates shall serve two-year terms. However, to create staggered terms, the first elected faculty member and alternate shall serve two years, and the first elected staff member and alternate shall serve one year.

Grievance Board members with prior involvement in a complaint -- personal or official -- must recuse themselves if the complaint goes to hearing. When that happens, the appropriate alternate shall replace the absent member.

All Board members -- whether elected as voting members or alternates, appointed to serve

as Chair, or elected to serve as fifth voting members -- shall be protected against personal liability for their official actions under an insurance policy maintained by the College.

[Back to menu](#)

VI. Summary of Grievance Procedure

Mills is committed both to protecting the victims of discrimination and to promoting understanding to resolve perceived instances of differential treatment or harassment. Individuals who believe they have been subjected to discrimination or harassment can pursue several options to resolve their complaints.

1. Consulting with the Ombud. One option is to seek the guidance and assistance of the **Ombud** office on campus. Complaints taken to the Ombud are confidential except to the extent the claimant authorizes disclosure of information about the complaint. The Ombud can help analyze the situation, identify options, mediate conflict and offer suggestions for a fair and civil outcome. By facilitating communication and promoting understanding, the Ombud can play an important role in helping to resolve complaints. However, the Ombud **cannot** arbitrate, adjudicate or otherwise take decisive action to resolve a complaint.

2. Pursuing an Administrative Complaint. Another option is to pursue an informal or **administrative complaint**. The College's goals for responding to an administrative complaint are to gather information, identify sources of conflict, analyze problems, and offer ways for resolving the complaint. College officials handling an administrative complaint have the responsibility to: be creative in seeking ways to resolve a complaint and take decisive action upon finding a satisfactory method for resolving a complaint.

Sexual harassment complaints filed as administrative complaints are **confidential** except to the extent the claimant authorizes disclosure of information about the complaint. Every effort will be made to resolve complaints successfully within the confidentiality constraints. Other discrimination and harassment complaints will be given similar consideration; however, the claimant will be advised that successful resolution often is impossible without some disclosure. The receiving official shall discuss the reasons why each disclosure is necessary with the claimant, and the claimant shall have the option of withdrawing the complaint to prevent disclosure. (See Section X on Confidentiality.)

3. Filing a Formal Complaint. A final option is to file a **formal complaint**. Formal complaints are subject to investigation, hearing before the Grievance Board, and a final decision by the Provost, with the right to appeal to the President of Mills.

The grievance procedure is designed to resolve a discrimination complaint without resort to the legal process. Once a claimant initiates a lawsuit, the College may choose to abandon efforts to resolve a claim of discrimination by means of its internal grievance procedure.

[Back to menu](#)

VII. Guidelines for Administrative Complaints

A. Getting Help. The College shall maintain a list of designated receiving officials who can be relied on to handle a complaint appropriately. The receiving official to approach for help

in pursuing an administrative complaint usually depends on whether the claimant is a student, faculty member or staff member. Anyone who perceives a problem is encouraged to seek help.

- 1. Students.** A student ordinarily would go to the Office of the Dean of Students for help. Many people in that Office will be on the list and prepared to serve as designated receiving officials by listening to and advising students about possible ways to resolve a complaint. Graduate students also have the option of going to the Assistant/Associate Provost for help.
- 2. Faculty Members.** A faculty member may go to an Academic Dean or Department Head for help.
- 3. Staff Members.** A staff member may go to a supervisor or the Director of Personnel for help.
- 4. Any Claimant** -- student, faculty or staff -- can go to any of the designated receiving officials listed above for help.

Any claimant is free to take a different route from 1-4 above for making the first contact to discuss a problem as there is no prescribed procedure for bringing an administrative complaint to the attention of the College. However, the interests of confidentiality and prompt resolution are best served by making sure that a designated receiving official receives timely information about the complaint.

B. Handling of Administrative Complaints. A designated receiving official who receives an administrative complaint is obligated to take that complaint seriously and to gather information about the alleged discrimination from the claimant, evaluate that information, and pursue ways to resolve the problem informally.

When the administrative complaint is against an individual, the receiving official may: encourage the claimant to talk to the individual directly, offer to act as mediator between the claimant and the individual, suggest training or education options for the individual, or recommend other appropriate ways to resolve the problem.

When the administrative complaint is against an office, department, division or other unit of the College, the receiving official's information gathering process may include consultations with experts about the requirements for compliance with the laws and other standards in Sections II-IV.

Even when it appears that the College is in compliance, the receiving official will continue to seek fair and equitable ways to resolve the claimant's problem. For example, the receiving official may: ask the claimant what can be done to achieve a satisfactory outcome; seek strategies for developing better communications, recommend training or education for part or all of the College community; look for ways to mitigate sources of friction and misunderstanding; suggest an internal or outside review of certain College operations; or recommend the use of a facilitator or mediator.

C. Resolving Administrative Complaints. The College is committed to resolving administrative complaints informally -- without resort to the formal complaint process --

whenever possible. Thus all persons involved in handling an administrative complaint will be flexible in their efforts to obtain a satisfactory resolution. All suggestions for resolving the problem informally will be considered. The College officer with authority over the individual or unit of the College charged with discrimination shall have the power of final approval over action to be taken to achieve an informal resolution.

In most cases, successful resolution of an administrative complaint will not involve disciplinary measures against an individual. The object of informal resolution is to respond to a complaint with action designed to eliminate discrimination or the perception of discrimination and serve as an example of the College's commitment to non-discrimination and equal opportunity.

However, sometimes the College may be compelled to reprimand or otherwise discipline an individual to protect a claimant from further harm. The College will refrain from taking disciplinary action on an administrative complaint without first giving the individual charged with discrimination an opportunity to respond to the specific allegations in the complaint. This may require identifying the claimant to the individual charged with discrimination. Furthermore, for any action that implies an administrative finding of discrimination or harassment against an individual, the individual may invoke the protections and rights of this policy and procedure, including a formal hearing, on condition that the individual is able to challenge the action itself as discrimination or harassment.

If informal resolution fails or if the claimant is not satisfied with efforts to resolve an administrative complaint, the receiving official will counsel the claimant about the right to file a formal complaint. The receiving official will continue to inform the claimant about available options during and after the formal complaint process.

[Back to menu](#)

VIII. Employment Complaints

Certain conditions of employment pose special challenges for the handling of discrimination complaints brought by College staff members. One challenge is the fair handling of discrimination complaints brought by probationary employees, who lack formal grievance rights during their probationary period. Another challenge is the fair handling of discrimination complaints brought by non-union staff against union staff members.

- 1. Probationary Employees.** Probationary employees with discrimination complaints may avail themselves of all the rights and protections in this policy and procedure, including the pursuit of formal discrimination complaints. The employment rule that bars probationary employees from filing formal grievances to protest their job status does not affect their legal right to pursue discrimination complaints under this policy and procedure.
- 2. Complaints against Union Members.** A non-union staff member who brings an administrative complaint against a union member may feel intimidated by the presence of a union representative as an advocate for the alleged offender at meetings to discuss or resolve the complaint. If this situation arises, the non-union staff member may choose a member of the Mills community to come to the meetings and act as the non-union claimant's personal representative. However, lawyers are

prohibited from performing this role for non-union claimants.

[Back to menu](#)

IX. Confidentiality

1. Claimants. In general, the College and persons handling an administrative complaint of discrimination will make a good faith effort to honor a claimant's request for confidentiality. Neither the receiving official nor any College officer asked to assist in handling an administrative complaint shall discuss the matter with others without first getting permission from the claimant. Disclosure to others shall be limited to the individual charged with discrimination and, with the claimant's consent, other persons essential to a successful resolution of the complaint.

If the complaint is one of sexual harassment, the name or other identifying characteristics of the claimant shall not be disclosed to the individual charged with sexual harassment unless the claimant expressly authorizes such disclosure. In addition the College will notify a sexual harassment claimant whenever it must comply with its duty to report and warn the campus community of crimes of a sexual nature posing threats to public safety.

For administrative complaints alleging other forms of discrimination or harassment, the College shall give similar consideration to a claimant's request for confidentiality. It shall review any legal requirements regarding notice and/or disclosure and weigh the advantages and disadvantages of disclosure for achieving successful resolution of each complaint. If the outcome of this review is a decision to make certain disclosures, the College shall discuss and explain its decision to the claimant before making the disclosures. The claimant may prevent this disclosure by withdrawing the complaint.

The College is not able to maintain confidentiality for a claimant during the formal complaint stage. When a formal complaint is filed, the individual charged with discrimination is entitled to know the identity of his/her accuser and the specific charges against him/her.

2. Individuals Charged with Discrimination. The College will respect a request for confidentiality from an individual charged with discrimination to the best of its ability during the administrative complaint stage. The receiving official shall take precautions aimed at preventing the publication of unsubstantiated charges against an individual by limiting disclosure of allegations in the complaint to persons essential to successful resolution of the complaint.. However, efforts to maintain confidentiality on behalf of an individual charged with discrimination shall not stop College officials from carrying out their duty to report possible criminal offenses or from taking action to protect a claimant or others from possible harm.

[Back to menu](#)

X. Retaliation

It is against College policy to retaliate against any good faith claimant making an administrative or formal complaint or seeking help from the Ombud. If the alleged discrimination or harassment included a threat of retaliation or if the claimant has other

good reason to fear retaliation, the College officials handling a complaint will determine what action would be necessary to protect the claimant from harm.

It also is against College policy to retaliate against anyone participating in the grievance process, including witnesses for the claimant, persons trying to handle the problem, an individual charged with discrimination, and witnesses for the charged individual. Persons who engage in retaliatory conduct could be subject to discipline, and retaliatory conduct is the basis for a separate claim of discrimination or harassment.

[Back to menu](#)

XI. Formal Complaints

1. Filing a Formal Complaint. A formal complaint must be in writing, using the attached form. A vague complaint will not be turned away but the claimant will be asked to provide more details to aid an effective investigation. A formal complaint must be filed with the Assistant/Associate Provost, who shall promptly turn the matter over to an impartial College official to conduct an investigation of the complaint.

2. Investigation. The investigation shall not take longer than 10 working days. The official chosen to investigate shall collect information about the complaint by interviewing the claimant, the individual charged with discrimination, members of the office, department or division charged with discrimination, and third parties deemed to have knowledge relevant to the allegations in the complaint or defenses to the complaint. The investigator shall determine which third parties to interview. The investigator also shall review any documentary evidence produced by the claimant, the individual charged with discrimination or the College.

The investigator must submit a written report within 3 working days after expiration of the investigation period. The investigator's report should summarize the facts underlying the complaint, assess the potential merits of both sides, and make recommendations about further handling of the complaint. The investigator may recommend trying to resolve the complaint prior to hearing, ending the grievance without a hearing, or moving forward to a hearing. A recommendation to end without a hearing must be based on a finding that the allegations in the complaint cannot be substantiated by information discovered during the investigation. The investigator's report shall be part of the record at hearing, and copies of the report shall be provided to both parties in cases that go forward to hearing.

The Assistant/Associate Provost must review the investigator's report and decide whether to grant a hearing within 5 working days of receiving the report. Dissatisfaction with the scope of the investigator's report would be sufficient cause for the Assistant Provost to reopen the investigation for a period of time not to exceed 20 working days.

If a hearing is denied, the claimant shall be notified in writing of the decision and the reasons for it. The claimant can appeal the denial of hearing to the Grievance Board within 5 working days of receiving notice of denial. The Board shall have 20 working days to review the adequacy of the investigation and the Assistant/Associate Provost's reasons for denying a hearing and to issue a decision upholding or reversing the denial. If a hearing is granted by the Assistant/Associate Provost or the Board, a notice setting a date, time and place shall be sent to the claimant, the receiving official, the College officer with authority

over the individual charged with discrimination, the Provost, the College President, members of the Grievance Board and the individual charged with discrimination. A hearing must occur within 15 working days of the decision granting a hearing.

3. Hearing. The Chair of the Grievance Board shall preside over hearings on formal complaints of discrimination or harassment. The purpose of a hearing is to provide the Board with an orderly and balanced presentation of the facts and issues in a complaint. Based on what it learns at the hearing, the Board shall determine if discrimination or harassment occurred. The Board shall state its final determination and other findings -- along with a recommended remedy in the event it finds discrimination to have occurred -- in a written proposed decision. The Board's proposed decision shall be submitted to the Provost for review and approval.

For every formal complaint, the claimant has the burden of proving the existence of discrimination or harassment by a preponderance of evidence. A final determination of discrimination or harassment must be based on undisputed facts, Board findings of fact or Board evaluations of credibility that support an ultimate conclusion in the claimant's favor.

There is no prescribed format for a hearing. The Chair shall use his or her power of control over the proceeding to guarantee each party a full, fair and impartial hearing. Formal rules of evidence and procedure will not be used. Lawyers will not be permitted to attend. In general the Chair will discourage the use of any witness, inquiry, statement or evidence deemed to be of minimal relevance to the facts and issues in the case.

At some point in the hearing, the Chair shall allow other Grievance Board members to ask questions of the parties and any witnesses permitted to testify at the hearing.

After the Chair has ended the hearing, the Board shall deliberate the matter and try to reach unanimous agreement on a proposed decision for resolving the complaint. If the entire Board cannot agree, the proposed decision must have the support of a majority. Dissenting members are free to submit alternative recommendations to the Provost. If majority support for a proposed decision is lacking, the Board Chair shall submit a written report to the Provost summarizing the facts and pinpointing the areas of disagreement among Board members. Individual Board members are free to provide the Provost with their own recommendations for resolving the complaint.

4. Proposed Decision. A written proposed decision (or report from the Chair) must be submitted to the Provost within 10 working days after the hearing has ended. The Board Chair may request an extension of 5 working days if disagreement among Board members delays the deliberation process. The proposed decision should contain a summary of the facts, an analysis of the issues involved, and a final determination on the existence of discrimination or harassment. If the Board finds for the claimant, its proposed decision also shall include a recommended remedy for addressing the injuries caused by the discriminatory conduct. In many cases, an effective remedy will involve the imposition of disciplinary measures against an individual. The severity of a discipline would depend on such factors as the seriousness of the offense, the existence of a pattern of discriminatory conduct and the requirements for shielding the College from institutional liability for individual misconduct. The proposed decision should articulate the reasoning behind the Board's final determination, recommended remedy and other findings.

5. Provost's Final Decision. The Provost shall approve or disapprove the Board's proposed decision within 10 working days. Usually the Provost will approve an unanimous proposed decision as long as there is no indication of procedural irregularities or bias on the part of the Board or a Board member. Even if the Provost approves a Board determination of liability, she may choose to adjust the recommended remedy or select a different remedy. Before disapproving the Board's proposed decision or changing the proposed remedy, the Provost shall meet with the Board to discuss her intended decision and consider arguments against it. The parties shall be notified promptly of the Provost's disposition. Along with this notice, the Provost shall send the parties a copy of the Board's written decision.

If the Provost approves, the period for filing an appeal begins as soon as the parties receive notice of final approval. If the Provost disapproves, the parties shall wait 10 working days for the Provost to review the matter and make a final decision. At the end of the review period, the Provost shall provide the parties with a copy of her written decision.

6. Appeal to the President. Either party may appeal to the President. Appeals of the Provost's decision must be filed with the President within 10 working days of receiving the Provost's decision.

The President shall act on an appeal within 15 working days. The President's decision on appeal shall terminate the grievance procedure. The College shall not entertain efforts by either party to continue the dispute once the grievance procedure is at an end -- with one exception. The receiving official shall perform his or her duty to inform the claimant about other avenues of relief outside the College's grievance procedure.

7. Recusal of Decision-Makers Charged with Discrimination. Any College official with decision-making authority in the formal complaint process shall recuse herself/himself from exercising that authority whenever she/he is named in a complaint as an individual who engaged in discriminatory or harassing conduct. However, if the complaint is against an office, department, division or other unit of the College and the official is named in the complaint as a representative of the College, there is no need for recusal.

[Back to menu](#)

XII. Recordkeeping

For administrative complaints, concern for confidentiality and fairness would generally prevent the College from reporting allegations of discrimination in its student records and personnel files. However, recordkeeping is essential if the College is to perform its duty of maintaining appropriate vigilance against patterns of discriminatory conduct and conduct tending to create a hostile educational or work environment. To aid the College's legal duty of vigilance, the President's office shall maintain confidential records of administrative and formal complaints. In addition, the President's office shall receive certain information from the Ombud's office for its records. The Ombud shall provide reports of general information on complaints -- number, nature, success in achieving satisfactory outcomes. The Ombud also shall provide notification -- consistent with the rules of confidentiality prescribed for that office -- of any complaint that warrants institutional attention.

For formal complaints that result in a finding of discrimination, the remedy in the final decision may specify if and how the disposition of the complaint shall be reported in the

discriminating offender's records or personnel file. If the remedy fails to address this question, the President shall determine if and how the disposition of the complaint shall be reported.

[Back to menu](#)

[Current Staff Job Openings](#) || [Employee Benefit Overview](#)
[Mills 97-98 Department Phones Quick Reference](#)
[Mills 97-98 Department Phone List](#)
[1999 Holidays](#)
[Human Resources Staff](#) || [Human Resources Homepage](#)
[Mills Administration](#) || [Mills Homepage](#)

Created on 5/8/98 by China Williams
Maintained by Human Resources Staff
Last revised on 09/11/99