

RESOLUTION AGREEMENT
Connecticut College
OCR Complaint No. 01-17-2303

Connecticut College (College) has voluntarily entered into this agreement to resolve the allegations in the above-referenced complaint that was filed with the Department of Education, Office for Civil Rights (OCR). The College agreed to resolve this complaint prior to the completion of OCR's investigation pursuant to Section 302 of OCR's *Case Processing Manual*, and to reaffirm its commitment to compliance with Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et seq.*, and its implementing regulations, 34 C.F.R. Part 106.

The College shall not be deemed or construed in any manner whatsoever to have made any admission of liability by the negotiation, performance, terms, or conditions of this Resolution Agreement. Rather, the College has entered into this Resolution Agreement to conclude OCR's investigation and to confirm that its Title IX program is compliant with Title IX. This agreement should not be construed to be a determination by OCR that the College is not in compliance with Title IX.

ACTION ITEMS

To resolve this Complaint, the College assures OCR that it will take the following actions:

Action Item 1

The College will review its Gender-Based Discriminatory Conduct and Title IX Complaint Investigation Process policies (Title IX Policies) and revise them as appropriate to confirm that they are consistent with the obligations of Title IX and its implementing regulation, and specifically ensure that instances where the parties have complaints against each other are handled consistently with Title IX obligations (Revised Policy). The College agrees that the revisions to its Title IX Policies, once approved, will replace the relevant provisions in its current Title IX Policies.

Reporting Requirements:

1. By April 1, 2019, the College will provide the Revised Policy to OCR, along with documentation to show that the College has:
 - a. Published these documents on its website or other usual means of distribution, by providing OCR with the URL and/or other evidence of distribution; and
 - b. Disseminated a memorandum to College personnel who are involved in the Title IX process, to apprise such staff of the Revised Policy, by providing to OCR a copy of that memorandum as well as evidence of the distribution list.

Action Item 2

In addition to the regular training the College provides regarding Title IX, the College will conduct additional training for the Title IX coordinators and investigators to ensure that they understand any new procedures for handling related complaints. The training shall explain that when an investigation proceeds past the preliminary inquiry stage, all parties to each complaint must receive notice of the investigation, an opportunity to respond, and an opportunity to provide additional witnesses whose testimony may be relevant to the additional complaints being investigated.

Reporting Requirements:

1. By April 1, 2019, the College will conduct the training, and provide OCR with documentation sufficient to show that the training occurred and that all required personnel were present.

OTHER PROVISIONS

The College understands that by signing this Agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the Agreement. Further, the College understands that during the monitoring of this Agreement, if necessary, OCR may visit the College, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the College has fulfilled the terms of this Agreement. Upon the College’s satisfaction of the commitments made under the Agreement, OCR will close the case.

The College understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10) or judicial proceedings to enforce this Agreement, OCR shall give the College written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

The Agreement will become effective immediately upon the signature of the College’s representative below.

By: /s/ _____ Date: February 14, 2019
John F. McKnight, Jr.
Dean of Institutional Equity and Inclusion