

**Cleveland State University
Resolution Agreement
OCR Docket # 15-22-2057**

Cleveland State University (the University) voluntarily submits this Resolution Agreement (Agreement) to the U.S. Department of Education, Office for Civil Rights (OCR), for the purpose of resolving the above-referenced complaint and ensuring compliance with Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et seq.*, and its implementing regulation at 34 C.F.R. Part 106; and with the Age Discrimination Act of 1975 (the Age Act), 42 U.S.C. § 6101 *et seq.*, and its implementing regulation at 34 C.F.R. Part 110.

The University agrees to take the following actions:

1. By **August 15, 2022**, the University will inform the Complainant, by certified mail and by e-mail, that it will conduct an investigation of XXX XXXXXXXXXXXX XXXX XXXXXXXXXXXX XX age and sex discrimination, pursuant to the University's Office for Institutional Equity (OIE) Procedures for Addressing Reports of Discrimination, Harassment, Sexual Violence and Retaliation (Discrimination Grievance Procedures). The letter and e-mail required by this Item must include either copies of or links to the University's Discrimination Grievance Procedures as well as the University's Notice of Non-Discrimination, and the University's Policy Against Discrimination, Harassment, Sexual Violence and Retaliation.

Reporting Requirement: By **August 30, 2022**, the University will provide OCR with documentation showing that the University implemented Item 1.

2. By **September 30, 2022**, the University will conduct a full investigation of XXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXX XXXX XXX XXXXXXXXXXXX of age and sex discrimination in accordance with the University's Discrimination Grievance Procedures and will provide the Complainant with an Investigator's Report showing the results of the University's investigation and notify the Complainant of any right to appeal.

Reporting Requirements: By **October 10, 2022**, the University will provide OCR with documentation showing that the University implemented Item 2, including a copy of the Investigator's Report, and copies of all investigative materials, including witness interviews, other documents or evidence considered, any e-mail correspondence regarding the investigation (including e-mails between University staff or between University staff and the Complainant), and any other documentation or correspondence related to the investigation. If the Complainant elects an informal resolution process pursuant to the University's Discrimination Grievance Procedures, the University will also provide all documentation related to that process.

3. By **December 9, 2022**, the University will provide training by a competent authority on Title IX and the Age Act to all OIE staff involved in receiving or processing discrimination complaints. The training will address, at a minimum:

- a. Title IX and the Age Act’s prohibition against sex and age discrimination respectively, and the requirements under those laws that the University publicize and implement sex and age discrimination grievance procedures.
- b. The University’s obligation to address complaints of sex and age discrimination even if XXXX XXX XXXXXXXX XX XXX XXXXXXXX XX X XXXXXXXXXXXX XXXX XX XXXXXXXXXXXX, XXXX, X XXXXX XXXXXXXX.
- c. The University’s Discrimination Grievance Procedures, and any related policies or procedures related to addressing complaints or incidents of sex or age discrimination.

Reporting Requirements: By **December 16, 2022**, the University will provide OCR with documentation showing that the University implemented Item 3. Specifically, the University will provide the date(s) of the training, how the training was provided, verification of the names and titles of administrators and staff who received the training, the name and qualifications of the presenter(s), outlines of the topics covered in the training, and any materials distributed during the training.

General Requirements

The University understands and acknowledges that OCR may initiate proceedings to enforce the specific terms and obligations of the Agreement and/or Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.*, and its implementing regulation at 34 C.F.R. Part 106; and the Age Discrimination Act of 1975, 42 U.S.C. § 6101 *et seq.*, and its implementing regulation at 34 C.F.R. Part 110. Before initiating such proceedings, OCR will give the University written notice of the alleged breach and 60 calendar days to cure the alleged breach.

The University understands that OCR will not close the monitoring of this Agreement until OCR determines that the University has demonstrated compliance with all the terms of this Agreement and is in compliance with Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.*, and its implementing regulation at 34 C.F.R. Part 106; and with the Age Discrimination Act of 1975, 42 U.S.C. § 6101 *et seq.*, and its implementing regulation at 34 C.F.R. Part 110, which were at issue in this complaint.

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

President or Designee

Date