

**Resolution Agreement
Cuyahoga Community College
OCR Docket Number 15-22-2065**

Cuyahoga Community College (the College) enters into this Resolution Agreement (Agreement) to resolve issues raised in OCR Docket Number 15-22-2065. The College assures OCR that it will take the following actions to comply with the requirements of Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §§ 1681 *et seq.*, and its implementing regulation, 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex in any education program or activity receiving Federal financial assistance.

Prior to the completion of OCR's investigation, the College agreed to resolve the issues of this investigation pursuant to Section 302 of OCR's *Case Processing Manual*. Accordingly, to ensure compliance with Title IX and its implementing regulation, the College voluntarily agrees to the following actions.

I. Review and Revision of Practices, Policies, and Procedures

- A. The College will review its practices, policies, and procedures for providing adjustments for pregnant students, to ensure that the College adequately addresses Title IX's prohibition on discrimination against pregnant students. During its review, the College will identify the relevant practices, policies, and procedures currently in effect and revise, or as needed, develop, written policies and procedures.

Reporting Requirements: By September 1, 2023, the College will submit to OCR documentation demonstrating that the College has: (i) identified all relevant practices, policies, and procedures and (ii) as needed, revised procedures pursuant to Item I.A above. The College will include a draft of the proposed revisions¹ for OCR's review and approval. The College will promptly and fully address OCR's feedback, if any, until the College receives OCR's final approval of the revised policies and procedures.

- B. Within calendar days of receiving OCR's final approval of the policies and procedures, the College will adopt and implement the policies and procedures, and disseminate them to all students, faculty, and staff.

Reporting Requirement: Within 30 calendar days of receiving OCR's final approval of the policies and procedures, the College will submit to OCR documentation demonstrating the College has: (i) formally adopted revised policies, and (ii) disseminated the adopted procedures to all students, faculty, and staff. The College will promptly and fully address OCR's concerns, if any, regarding adoption and dissemination of the revised policies and procedures.

¹ The College will submit the revised policies and procedures by submitting: (i) a red-lined version of the proposed changes, and (ii) a clean copy of the proposed final policies and procedures.

II. Website Update and Dissemination of Information

The College will publish prominently on its website and elsewhere, as appropriate, information regarding: (i) the Title IX rights of—and the College’s obligations to—pregnant students; (ii) the procedure for pregnant students to request adjustments to the regular program; (iii) the name and contact information for the individual(s) tasked with coordinating the College’s response to requests for adjustments from pregnant students; (iv) if different from (iii) above, the name and contact information for the College’s Title IX Coordinator²; and (v) the grievance procedure for students to file complaints of sex discrimination, including pregnancy-related complaints, and a web link to the grievance procedures.

Reporting Requirement: By November 1, 2023, the College will provide OCR with web links and, if applicable, hard copies of the publications in Item II above, as well as the method(s) and date(s) of publication for any hard copies.

III. Training Regarding Rights and Obligations to Pregnant Students

The College will provide training regarding the Title IX rights of pregnant students and the College’s obligations regarding pregnant students. This training must include: (i) how and to whom students may submit requests for adjustments to the regular program; (ii) the contact information for the College’s Title IX Coordinator and any individual(s) tasked with coordinating the College’s response to requests for adjustments from pregnant students; (iii) the process for identifying and providing adjustments; (iv) examples of pregnancy-related adjustments; and (v) the grievance procedure for students to file complaints of sex discrimination, including pregnancy-related complaints.

Reporting Requirements:

IV. By November 1, 2023, the College will provide OCR Survey for Trained Faculty and Staff

The College will assess the effectiveness of the training referenced in Item III above by conducting a survey of the faculty and staff who attend the training. The survey will specifically inquire about their knowledge regarding: (a) how and to whom students may submit requests for adjustments to the regular program; (b) the contact information for the College’s Title IX Coordinator and any individual(s) tasked with coordinating the College’s response to requests for adjustments from pregnant students; and (c) the grievance procedure for students to file complaints of sex discrimination, including pregnancy-related complaints.

Reporting Requirements:

- the College will provide OCR a draft survey for assessing the effectiveness of the training. The College will promptly and fully address OCR’s feedback, if any, until the College receives OCR’s final approval of the survey.

² The College will resolve any inconsistent contact information for the Director of Institutional Equity and Title IX/Section 504 Coordinator on the College website and elsewhere.

- Within 30 days of receiving training attendees' survey results, the College will provide documentation to OCR of the results of the survey and a description of any actions the College took or plans to take in response to the survey results, including conducting additional training sessions to ensure effective training is provided. The College will promptly and fully address OCR's feedback regarding the survey results, if any.

V. Tracking System for Pregnancy-Related Adjustments for Students

By 1, 2023, the College will develop a system for tracking: (i) requests for pregnancy-related adjustments for students made to the Title IX Coordinator, faculty or other staff; (ii) the responses to the requests, including verification of adjustments provided by faculty, staff or others; and (iii) the reasons for the denial of any requests.

Reporting Requirements: **By 1, 2023**, the College will provide OCR with details regarding the tracking system, including how requests for adjustments, responses, and denials are documented and tracked. The College will promptly and fully address OCR's feedback, if any, regarding the tracking system.

VI. List of Requests for Pregnancy-Related Adjustments and the College's Responses

By April 8, 2024, the College will compile a list of all pregnancy-related requests for adjustments for students and all responses to the requests for the period, 2023 – March 31, 2024.

Reporting Requirements:

- **By April 8, 2024**, the College will provide OCR the above list of pregnancy-related requests for adjustments for students, and all responses to the requests for the period.
- If OCR determines it needs underlying documentation, the College will provide such documentation within **10 business days** of OCR's request.

VII. General Requirements

The College understands and acknowledges that OCR may initiate administrative enforcement proceedings to enforce the specific terms of the Agreement and/or Title IX and its implementing regulation, 34 C.F.R. Part 106. Before initiating such proceedings, OCR will give the College written notice of the alleged breach and 60 calendar days to cure the alleged breach.

The College understands that OCR will not close the monitoring of this Agreement until OCR determines that the College has demonstrated compliance with all the terms of this Agreement and is in compliance with Title IX and its implementing regulation, which were at issue in the case.

This agreement will become effective immediately upon the signature of the College's representative.

/s/

09/27/2023

President or Designee

Date