

RESOLUTION AGREEMENT

Chester Career College OCR Case No. 11-26-2263

Chester Career College (the College) agrees to fully implement this Resolution Agreement to resolve the allegations investigated in Office for Civil Rights (OCR) Case No. 11-26-2263. This Agreement does not constitute an admission by the College of a violation of Title IX of the Education Amendments of 1972 (Title IX), or any other law enforced by OCR.

Action Item 1 – Title IX Policies and Grievance Procedures

- A. The College will submit to OCR for review and approval policies and procedures (policies) regarding the resolution of reports and formal complaints alleging sexual harassment by students, employees, and/or third parties, to ensure that the policies comply with the Title IX regulations at 34 C.F.R. Part 106.
- B. Upon OCR's approval of the policies, the College will formally adopt the policies and promptly publish them on the College website and in its handbooks and catalogs, remove all policies and procedures that are no longer in effect, and provide notice to all College faculty, staff, and students of the policies.

Reporting Requirements

- a. By August 1, 2026, the College will submit the policies to OCR for OCR's review and approval.
- b. Within 30 calendar days of receiving OCR's written approval of the policies, the College will provide OCR with documentation demonstrating it has adopted, published, and disseminated the policies.

Action Item 2 - Notice of Non-Discrimination

- A. The College will adopt, post, and disseminate a notice of nondiscrimination (Notice) that includes all of the information required by Title IX.

Reporting Requirements

- a. By August 1, 2026, the College will provide a copy of its proposed Notice to OCR for its review and approval.
- b. Within 30 days of OCR's review and approval, the College will provide OCR with documentation of the College's dissemination of the approved Notice, including copies of any publications and web links to any electronic publications containing the Notice, and confirmation that the College has reviewed any current College publications containing an

older notice of nondiscrimination and replaced any such notice of nondiscrimination with the approved Notice.

Action Item 3 – Title IX Training

A. Title IX Coordinator and Title IX Staff

1. The College will train its designated Title IX Coordinator and any other College employees involved in the processing, investigation, and/or resolution of sexual harassment reports and/or formal complaints. The individual providing the training will be qualified and have expertise in Title IX. The training will cover the College's Title IX policies and grievance procedures and its Title IX obligations in responding to sexual harassment reports and complaints, including (1) how to identify conduct that constitutes harassment under Title IX; (2) what are supportive measures and how and when to inform parties of supportive measures; and (3) how to investigate and resolve a Title IX complaint, including resolving matters promptly and equitably, the compilation and retention of investigative documents, and holding a live hearing with the opportunity for cross-examination.

B. Annual Staff Training

1. The College will provide annual training on sex discrimination, including sexual harassment, to all College employees during the 2026-2027 and 2027-2028 academic years. The training will include instruction on: (1) recognizing, responding to, and preventing sex discrimination and sexual harassment under Title IX; (2) employee responsibilities under Title IX to address and appropriately report sexually harassing behavior, observed or reported; and (3) the College's Title IX Policies and Grievance Procedures. The training will be conducted by someone who is qualified and has expertise in Title IX.

Reporting Requirements

- a. By August 15, 2026, the College will submit to OCR for review and approval a training plan for the Title IX Coordinator and any other College employees involved in the processing, investigation, and/or resolution of sexual harassment reports and/or formal complaints, including a copy of the proposed materials to be used for the trainings, and information about the identity and qualifications of the trainer(s).
- b. Within 30 calendar days of receiving OCR's approval of the training plan, the College will conduct the training(s) and provide verification to OCR, including (a) the name of the individual(s) who conducted the training; (b) the date(s) of the training session(s); (c) all training materials; and (d) a sign-in sheet with the names, signatures, and position titles of the College personnel who participated in each training session.
- c. By September 15, 2026, the College will submit to OCR for review and approval its annual training plan for all College employees, including a copy of the proposed

materials to be used for the trainings, and information about the identify and qualifications of the trainer(s).

- d. Within 45 calendar days of OCR's written approval of the training plan, the College will conduct the training(s) and provide verification to OCR, including: (a) the name of the individual(s) who conducted the training; (b) the date(s) of the training session(s); (c) all training materials; and (d) a sign-in sheet with the names, signatures, and position titles of the College personnel who participated in each training session.

Action Item 4 – Review of Case Files

- A. The College will provide OCR with information about all complaints or reports provided to a College employee or administrator during the 2026-2027 academic year by students, parents, staff, or others regarding sexual harassment of students at the College to ensure that its response was consistent with Title IX. The College will also assess whether it needs to take any additional steps to ensure compliance with Title IX.
- B. The College will send a notification to all students at the College explaining their right to file a complaint through the College's Title IX grievance process and providing a link to its Title IX grievance procedures.

Reporting Requirements

1. By August 1, 2027, the College will provide a spreadsheet tracking all complaints/reports of sexual harassment of students during the 2026-2027 academic year for OCR's review and approval. The spreadsheet will include, at a minimum, for each complaint or report:
 - i. The date the College received the complaint/report;
 - ii. Whether the College informed the person who made the complaint or report about available supportive measures and, if so, what measures were offered or provided;
 - iii. Whether the College explained how to file a formal complaint;
 - iv. The date an investigation was initiated;
 - v. A brief description of the alleged conduct and of any investigation (e.g., who was interviewed, evidence reviewed, etc);
 - vi. The outcome of the complaint, report, or investigation;
 - vii. Whether notice of the outcome was provided to the parties;
 - viii. Whether an appeal was filed and, if so, the date it was filed and the outcome;
 - ix. The date the process was completed; and
 - x. Whether there were any complaints about the grievance process and the College's response, if any.
2. The College will also provide OCR with any investigative reports related to each complaint/report of sexual harassment for OCR's review and approval. OCR reserves the right to request any additional documentation related to a complaint/report.

3. The College will promptly take corrective measures on any complaint/report OCR identifies as requiring further action by the College in order to comply with the requirements of Title IX.
4. By August 1, 2027, the College will provide OCR with a copy of the proposed notification for OCR's review and approval. Within 15 calendar days of OCR's approval, the College will distribute the notification to all students in the College and provide evidence to OCR of its distribution.

By signing this Agreement, the College agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the Agreement. 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 and obligations of this Agreement.

Upon the College's satisfaction of the commitments made under this Agreement, OCR will close the case.

The College understands and acknowledges that OCR may initiate proceedings to enforce the specific terms and obligations of this Agreement and/or the applicable statute(s) and regulation(s). Before initiating such proceedings, OCR will give the College written notice of the alleged breach and 60 calendar days to cure the alleged breach.

By: Margaret R. King Date: 7-9-2024
Chester Career College