

RESOLUTION AGREEMENT

Conception Seminary College
OCR Complaint No. 07252226

Conception Seminary College (College) has entered into this agreement to resolve the allegations in the above-referenced complaint. 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.

The College agrees to take the following actions:

Action Item 1 – Posting of Title IX Materials

- A. The College will, in accordance with the regulation implementing Title IX, at 34 C.F.R. § 106.8(b)(2), prominently display the name or title, office address, electronic mail address, and telephone number of the employee or employees designated as the Title IX coordinator on the College's website, and in each handbook or catalog it makes available to all applicants for admission and employment, students, employees, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient.
- B. The College will, in accordance with the regulation implementing Title IX, at 34 C.F.R. § 106.8(c), adopt and publish grievance procedures that provide for the prompt and equitable resolution of student and employee complaints alleging any action that would be prohibited by 34 C.F.R. Part 106 and a grievance process that complies with 34 CFR § 106.45 for formal complaints as defined in 34 C.F.R. § 106.30.
- C. The College will, in accordance with the regulation implementing Title IX, at 34 C.F.R. § 106.45(b)(10)(i)(D), publish on its website all materials used to train its Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process.

The materials must include training on:

- a. For the training of Title IX coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process:
 - i. the definition of sexual harassment in 34 C.F.R. § 106.30;
 - ii. the scope of the University's education program or activity;
 - iii. how to conduct an investigation and grievance process hearing, appeals, and informal resolution process, as applicable; and
 - iv. how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias, including the duty not to have a conflict of interest or bias for or against complainants or respondents generally, or with respect to an individual complainant or respondent.

- b. Investigators must also be trained on:
 - i. issues of relevance to create an investigative report that fairly summarizes relevant evidence, as set forth in 34 C.F.R. § 106.45(b)(5)(vii).
- c. Decision-makers must also be trained on:
 - i. any technology to be used at a live hearing; and
 - ii. issues of relevance of questions and evidence, including when questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, as set forth in 34 C.F.R. § 106.45(b)(6).

Reporting Requirement:

1. By **October 31, 2025**, the College will provide documentation showing that the above-mentioned Title IX materials have been published on the College's website.

Action Item 2 – Training

The College must ensure that the Title IX coordinator, investigators, decisionmakers, persons who are responsible for implementing the recipient's Title IX grievance procedures and any person who facilitates an informal resolution process receive training that includes (1) the College's obligation to address sex discrimination in its education program or activity; (2) the scope of conduct that constitutes sex discrimination under Title IX, including the definition of sex-based harassment; all applicable notification and information requirements; (3) how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias; and (4) the meaning and application of the term "relevant" in relation to questions and evidence.

Reporting Requirement:

2. By **November 30, 2025**, the College will provide documentation showing proof of completion of the required Title IX training.

By signing the resolution agreement, the College agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the resolution agreement. During the monitoring of the resolution 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 recipient has fulfilled the terms of the resolution agreement.

The College understands that OCR will not close the monitoring of the agreement until such time as OCR determines that the College is in compliance with the terms of the agreement and the statute(s) and regulation(s) at issue in the case.

The College understands that OCR may initiate administrative enforcement proceedings or refer the case to the Department of Justice (DOJ) for judicial proceedings in the event of breach.

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

By: Fr. Victor Schinstock, OSB Date: 8/18/25

Fr. Victor Schinstock, OSB, President-Rector
Printed name and title