



RESOLUTION AGREEMENT

Baylor University OCR Complaint No. 06162331

The United States Department of Education, Office for Civil Rights (OCR) and Baylor University (University) enter into this Agreement to resolve the allegations in the above-referenced complaint. This Agreement was entered into during the course of OCR's investigation of the complaint. The Agreement does not constitute an admission by the University that it was not in compliance with Title IX or its implementing regulations. The University 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, at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex by recipients of Federal financial assistance.

Accordingly, to resolve the allegations of the complaint, the University agrees to take the following actions:

ACTION ITEMS AND REPORTING REQUIREMENTS

Action Item I: Title IX Nondiscrimination Statement

The University will revise any non-conforming Title IX nondiscrimination statements to ensure that notice of nondiscrimination statements posted on University websites and included in University handbooks include required information, in accordance with Title IX.

Action Item I: Reporting Requirements

By **March 31, 2025**, the University will provide OCR with documentation sufficient to evidence the removal or revision of notices that do not comply with Title IX.

Action Item II: Title IX Policies and Grievance Procedures

The University will review and revise its current Title IX policies and grievance procedures, as necessary, to conform to Title IX, and in particular:

- a) will review its current policies and procedures, and revise as necessary the University's website, publications, and other materials, to make clear which procedure(s) can be used for complaints alleging any form of sex discrimination, including complaints of sex discrimination carried out by third parties;
- b) will review and revise the Amnesty Policy to ensure compliance with Title IX and the required equitable treatment of students (*i.e.*, complainants and respondents) and employees during the processing investigation of Title IX sexual harassment investigations;
- c) will review and revise all policies and procedures, if any, that permit the suspension of student athlete respondents from athletic participation without due process and prior to being found responsible for engaging in sexual harassment or assault by including a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process, during the processing of Title IX sexual harassment investigations to ensure compliance with Title IX; and
- d) will ensure that grievance procedures for addressing formal complaints of sexual harassment are compliant with Title IX and its implementing regulation.

Action Item II: Reporting Requirements

By **May 31, 2025**, the University will provide OCR written confirmation that it has reviewed, updated, and published its grievance procedures (including the Amnesty Policy), as necessary.

Action Item III: Title IX Online Reporting Mechanisms

The University will complete a comprehensive assessment of all online reporting mechanisms currently available to report any violation of Title IX by students, employees, and third parties. Based on the assessment, the University will develop an Action Plan to remedy any identified concerns.

Action Item III: Reporting Requirements

By **May 31, 2025**, the University will submit the above-referenced assessment and Action Plan to OCR.

Action Item IV: Title IX Coordinator Statement

The University will incorporate into its current Title IX policy a statement that all employees must extend full coordination, cooperation, and support to the University's Title IX Coordinator, in accordance with the University's Title IX policies and procedures. This statement, which may be incorporated into the University's Title IX policies, may include, but is not limited to:

- a) A description of the commitment by all University leadership and its employees to full institutional support for the Title IX Coordinator and compliance with Title IX;
- b) A description of the role and responsibilities of the Title IX Coordinator;
- c) Coordination and cooperation by all departments with the Title IX Coordinator regarding Title IX complaints and related issues; and
- d) Contact information for Title IX Coordinator.

Action Item IV: Reporting Requirements

By **March 31, 2025**, the University will provide to OCR its revised Title IX Policy which will incorporate the Title IX Coordinator Statement developed in accordance with Action Item IV and provide documentation evidencing the revised Title IX Policy was published and disseminated to University leadership and employees.

Action Item V: Title IX Data Maintenance and Record-Keeping

The University will develop internal protocols to consistently document and maintain data and keep records that will assist the University in assessing its Title IX compliance. The University's procedure will ensure maintenance of data and records sufficient to evidence that the University is providing prompt and equitable resolution of Title IX complaints. The University's internal protocols will also ensure maintenance of data on all Title IX sexual harassment complaints closed as "Declined Process," and the reason(s) asserted by each complainant, if any, for not pursuing a Title IX complaint. The University will utilize this information to assess its Title IX compliance.

Action Item V: Reporting Requirements

By **June 30, 2025**, the University will provide OCR with information or documentation confirming that the internal protocols were developed and distributed to appropriate University officials and are being utilized.

Action Item VI: Title IX Training for University Officials and Staff

The University will provide annual Title IX training to its Title IX Coordinator and all other University officials and staff involved in the processing of Title IX complaints (including third-party contractors, as applicable). The training will be conducted by (an) individual(s) knowledgeable about the University's Title IX policies and procedures, the Title IX Coordinator statement, and data maintenance and record-keeping processes.

Action Item VI: Reporting Requirements

By September 30, 2025, the University will provide documentation to OCR demonstrating that the initial training was provided by the University in accordance with Action Item VI above. The documentation will include, at a minimum, the name(s) and credentials of the trainer(s); the date(s) and time(s) of the training(s); a description of each training; the names and titles of those attending; copies of any training materials distributed; and evidence that the training materials are posted on the University's website or are otherwise available for public inspection upon request.

Action Item VII: University Monitoring of Title IX Sexual Harassment Complaint Processing

The University's Title IX Coordinator will review all written and oral complaints of sexual harassment, including sexual assault, within 30 days of receipt by the Equity Office to ensure that these complaints are being processed in a timely and equitable way. The Title IX Coordinator will then review these complaints again within 30 days of the final outcome of the complaint to identify any inequities or delays in the complaint resolution process. If the Title IX Coordinator identifies any concerns regarding the University's response to the complaints (e.g., an untimely or inequitable response), the Title IX Coordinator will document the concerns, direct the responsible individuals to address those concerns, and follow up to ensure that all identified concerns are addressed and resolved.

Action Item VII: Reporting Requirements

By July 31, 2025 and July 31, 2026, respectively, the University will submit to OCR documentation sufficient to evidence that the University's Title IX Coordinator completed an assessment of the Title IX complaints processed for the 2024-2025 and 2025-2026 academic years as set forth in Action Item VI. Where it has been determined that the University's response to Title IX complaints was either untimely and/or inequitable, the University will provide documentation evidencing the reason(s) for such concerns, corrective actions taken to ensure that all identified concerns are resolved, and the timeframe for completion of the corrective actions.

Action Item VIII: Current Processing of Title IX Sexual Harassment Complaints

The University will maintain documentation sufficient to demonstrate Title IX compliance with respect to all written and oral complaints of sexual harassment, including sexual assault, received during the 2024-2025 and 2025-2026 academic years, as required by Title IX.

Action Item VIII: Reporting Requirements

By August 28, 2025 and August 28, 2026, respectively, the University will report to OCR the status and/or outcome of all written and oral sexual harassment complaints, including complaints of sexual assault, received by the University during the 2024-2025 and 2025-2026 academic years.

For each such report, the University will provide OCR with an electronic spreadsheet, which will include the following information, at a minimum:

- a) the date of the alleged incident(s);

- b) the date(s) that the complaint or report was made to the Equity Office;
- c) the nature of the alleged conduct, including any harassment and retaliation;
- d) the identity and role of the complainant (e.g., student name or ID number, faculty, staff, or contractor name, and include job title in the next field for employee or contractor, if known);
- e) the gender of the complainant, if known (e.g., female, male, transgender, nonbinary, unknown);
- f) the identity of the target(s) of the harassment if different than the complainant;
- g) the identity and role of the respondent (student name or ID number, faculty, staff, or contractor),
- h) the gender of the respondent, if known (e.g., female, male, transgender, nonbinary, unknown);
- i) the date the University sent outreach to the complainant to offer supportive measures;
- j) for all complaints, the date(s) that the University notified each party of the allegations in the complaint constituting potential sexual harassment;
- k) for any complaint that was dismissed, the date the parties were notified of the dismissal and the reason for the dismissal;
- l) the date(s) that the University assigned the matter for investigation;
- m) the date(s) on which the complainant, respondent and all witnesses were interviewed;
- n) the date(s) of the live hearing;
- o) a summary of the determination regarding responsibility issued by the decision-maker, and of any related disciplinary action(s), and the dates on which the parties were notified of these outcomes;
- p) if informal resolution was utilized, the date the process was initiated, the date it was concluded, and the outcome of the process;
- q) whether there were any appeals, the outcome of the appeals, and the dates that the parties were notified of the outcome of the appeals; and
- r) if applicable, where an investigation was not completed, the reason for not completing the investigation, and what actions the University has taken, if any, to discharge its obligations under Title IX.

MONITORING

By signing the Agreement, the University agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the Agreement. During the monitoring of the Agreement, if necessary, OCR may visit the University, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the University has fulfilled the terms of the Agreement.

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

The University understands that OCR may initiate administrative enforcement proceedings or refer the case to the Department of Justice (DOJ) for judicial proceedings to enforce the specific terms of the Agreement and the applicable statute(s) and regulation(s). Before initiating such proceedings, OCR will give the University written notice of the alleged breach and 60 calendar days to cure the alleged breach.

EXECUTION

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


Dr. Linda Livingstone, President
Baylor University


Date