



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

July 28, 2026

By email only to [redacted content]

Dr. Roslyn Clark Artis
President
Benedict College
1600 Harden Street
Columbia, SC 29204

Re: Case Number 11-26-2244
Benedict College

Dear Dr. Artis:

This letter is to advise you of the outcome of the investigation that the U.S. Department of Education, Office for Civil Rights (OCR) conducted of this complaint filed against Benedict College (the College). The complaint alleged that the College is violating Title IX by failing to make publicly available on its website all Title IX training materials used to train Title IX coordinators, investigators, decisionmakers, and any person who facilitates an informal resolution process under Title IX.

OCR enforces 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 in any program or activity receiving federal financial assistance. As a recipient of federal financial assistance from the Department of Education, the College must comply with this law.

During its investigation to date, OCR reviewed documents provided by the Complainant and reviewed the College's website. Before OCR completed its investigation, the College expressed interest in resolving the allegation pursuant to Section 302 of OCR's *Case Processing Manual*, which states that allegation may be resolved prior to OCR making a determination if the school expresses an interest in resolving the allegations and OCR determines that it is appropriate to resolve them because OCR's investigation has identified issues that can be addressed through a resolution agreement. The following is a summary of the evidence obtained by OCR during the investigation to date.

Summary of Investigation

Benedict College is a private college in South Carolina that offers undergraduate and graduate degree programs in various fields of study. The Complainant alleged that the College failed to make publicly available on its website all Title IX training materials used to train Title IX

coordinators, investigators, decisionmakers, and any person who facilitates the informal resolution process.

OCR initially reviewed the College's website in May 2026. At that time, OCR could not find any evidence indicating that Title IX training materials were posted on its website. OCR therefore determined that the College had failed to publish on its website its Title IX training materials in accordance with the regulation implementing Title IX. Although the College recently posted Title IX training materials on its website at <https://benedict.edu/title-ix-policy-statement/>, OCR could not determine whether the published Title IX materials have been used to train any of its staff who handle Title IX-related complaints.

Legal Standard

The regulation implementing Title IX, at 34 C.F.R. § 106.45(b)(1)(iii), requires that a recipient train its designated Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process on the definition of sexual harassment, the scope of the recipient's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. The regulation further requires that decision-makers receive training on any technology to be used at a live hearing and on 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. The regulation also requires that investigators receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence. Additionally, 34 C.F.R. § 106.45(b)(1)(iii) provides that materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process, must not rely on sex stereotypes and must promote impartial investigations and adjudications of formal complaints of sexual harassment. Finally, 34 C.F.R. § 106.45 requires a recipient to make publicly available on its website all materials used to train its Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process.

Analysis

OCR identified a concern that the College had not made its Title IX training materials available on its website, as alleged and as required by the Title IX regulation. Although the College recently posted Title IX training materials on its website, OCR could not determine if they have been implemented, disseminated, or used by the College.

Conclusion

On July 28, 2026, the College agreed to implement the enclosed Resolution Agreement, which, when fully implemented, will address the above-described concerns. OCR will monitor the College's implementation of the agreement until the College is in compliance with the terms of the agreement.

This concludes OCR's investigation of the complaint. This letter should not be interpreted to address the College's compliance with any other regulatory provision or to address any issues

other than those addressed in this letter. This letter sets forth OCR's determination in an individual OCR case. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public. Individuals who file complaints with OCR may have the right to file a private suit in federal court whether or not OCR finds a violation.

Please be advised that the College must not harass, coerce, intimidate, discriminate, or otherwise retaliate against an individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a retaliation complaint with OCR.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. If OCR receives such a request, it will seek to protect, to the extent provided by law, personally identifiable information that, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

We appreciate the College's cooperation in the resolution of this complaint. If you have any questions, please contact Ravan Austin, the OCR attorney assigned to this complaint, at Ravan.Austin@ed.gov.

Sincerely,

/s/

Dan Greenspahn o/b/o Sharon Goott Nissim
Acting Team Leader

Enclosure

cc: [redacted content]