



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

July 31, 2026

Brandee Hancock, Interim General Counsel
Office of Legal Counsel
OSU/A&M Board of Regents
Sent via email to: [redacted content]

Re: Connors State College
OCR Complaint No. 07262101

Dear Ms. Hancock:

The U.S. Department of Education, Office for Civil Rights (OCR), received a complaint against Connors State College (the College), alleging discrimination based on sex. Specifically, the complaint alleged the College did not make its Title IX training materials available on its website and failed to adopt and publish grievance procedures that provide for a live hearing, live testimony, and cross examination. This letter is to acknowledge that the College voluntarily entered into a Resolution Agreement (Agreement) resolving the complaint. This decision is explained below.

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 U.S. Department of Education, the College is subject to Title IX and OCR's jurisdiction. Additional information about the laws OCR enforces is available on our [website](#).

In response to the complaint, OCR investigated:

1. Whether the College makes all materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process publicly available on the College's website, as required by Title IX and 34 C.F.R. § 106.45(b)(10)(i)(D); and
2. Whether the College provides a grievance process for resolving formal complaints that includes a live hearing and complies with the requirements of Title IX and 34 C.F.R. § 106.45(b)(6)(i).

During the investigation to date, OCR reviewed information provided by the Complainant and the College, reviewed the College's website, and spoke with a College representative.

Legal Standard

The regulation implementing Title IX, at 34 C.F.R. § 106.44, provides that a recipient with actual knowledge of sexual harassment in an education program or activity of the recipient against a person in the United States must respond promptly in a manner that is not deliberately indifferent, and that a recipient's response to a formal complaint of sexual harassment must follow a grievance process consistent with the elements set forth in 34 C.F.R. § 106.45.

The regulation implementing Title IX, at 34 C.F.R. § 106.45(b)(6)(i), states, in part, that for postsecondary institutions, the recipient's grievance process must provide for a live hearing. At the live hearing, the decision-maker(s) must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time. Under 34 C.F.R. § 106.45(b)(6)(i), a decision-maker at a post-secondary institution may consider statements made by parties or witnesses that are otherwise permitted under the Title IX regulations, even if those parties or witnesses do not participate in cross-examination during the live hearing, in reaching a determination regarding responsibility in a Title IX grievance process.

The regulation implementing Title IX provides, at 34 C.F.R. § 106.45(b)(10)(i)(D), that a recipient must 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.

Summary of Preliminary Investigation

OCR reviewed the College's website and the information provided by the College and the Complainant. OCR could not find, nor could the College otherwise provide, evidence indicating that training materials were posted on the College's website prior to the complaint. The evidence also suggested that the College maintained grievance procedures providing for a live hearing, live testimony, and cross-examination. However, the Title IX document that contained these procedures was labeled as an "interim" policy and was not identified in some of the documentation reviewed by OCR, such as the Student Handbook and a Title IX flyer. Another document reviewed by OCR referenced this policy but appeared to contain a broken link.

Analysis and Conclusion

OCR's investigation of the complaint raised concerns that the College had not made its Title IX training materials available on its website and that it may have failed to adequately publish grievance procedures that provide for a live hearing, live testimony, and cross examination. Prior to the conclusion of OCR's investigation and pursuant to Section 302 of OCR's [Case Processing Manual](#), the College expressed an interest in resolving this complaint and OCR determined that a voluntary resolution is appropriate. Accordingly, the College signed the enclosed Agreement which, when fully implemented, will address all of the allegations raised in the complaint. OCR will monitor the College's implementation of the Agreement until the College has fulfilled its terms.

This concludes OCR's investigation of the complaint. When OCR determines the College has fully implemented the terms of the Agreement, OCR will close this complaint. If the College fails to carry out the Agreement, OCR may resume investigating the complaint. OCR will not close the monitoring of the Agreement until OCR determines that the College has demonstrated compliance with all the terms of the Agreement and is in compliance with Title IX, and its implementing regulations, which were at issue in this complaint.

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 OCR policy. 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 regardless of whether OCR finds a violation.

The College may 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. Complaints alleging such retaliation may be filed 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.

If you have any questions, you may contact Thomas Jones, Attorney, at thomas.jones@ed.gov.

Sincerely,

/s/

Benjamin Carr
Supervisory Attorney

Enclosure