



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

1999 BRYAN ST., SUITE 1620
DALLAS, TX 75201-6810

REGION VI
ARKANSAS
LOUISIANA
MISSISSIPPI
TEXAS

March 23, 2016

Michael J. Sorrell, President
Paul Quinn College
3837 Simpson Stuart Rd.
Dallas, TX 75241

Via first class mail and email (president@pqc.edu)

RE: OCR Case No. 06162100
Paul Quinn College

Dear Mr. Sorrell:

The U.S. Department of Education (Department), Office for Civil Rights (OCR), Dallas Office, has completed its evaluation of the above-referenced complaint, which was received in this office on [b6; b7A; b7C]. The complainant (Student) alleged that Paul Quinn College (PQC) in Dallas, Texas, discriminated against [b6; b7A] on the basis of sex by failing to appropriately respond to [b6; b7A] report of sexual harassment and sexual violence by another student during [b6; b7A; b7C] term (i.e., failed to investigate the complaint and [b6; b7A; b7C] [b6; b7A; b7C]).

This agency is responsible for determining whether entities that receive or benefit from Federal financial assistance, either from the Department or from an agency that has delegated investigative authority to the Department, are in compliance with Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681, and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex. PQC is a recipient of Federal financial assistance from the Department. Therefore, OCR has jurisdictional authority to investigate allegations of discrimination filed against PQC under Title IX and is opening for investigation the following legal issues:

1. Whether PQC provided prompt and equitable responses to complaints, reports, and/or other incidents of sexual harassment or sexual violence, of which it had notice (knew about or should have known about) (including the Student's complaint), as required by the Title IX implementing regulation at 34 C.F.R. §§ 106.8, 106.9, and 106.31.
2. Whether any failure by PQC to provide a prompt and equitable response allowed the Student or other students to be subjected to a sexually hostile environment that denied or limited students' ability to participate in or benefit from PQC's programs, in violation of the Title IX implementing regulation at 34 C.F.R. §§ 106.8 and 106.31.

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Please note that opening an allegation for investigation in no way implies that OCR has made a determination with regard to its merit. During the investigation, OCR is a neutral fact-finder, collecting and analyzing relevant evidence from the complainant, the recipient, and other sources, as appropriate. OCR will ensure that its investigation is legally sufficient and is dispositive of the allegations in accordance with the provisions of OCR's *Case Processing Manual*. For your information, we have enclosed OCR's *Complaint Processing Procedures* to provide you with an overview of our complaint evaluation and resolution process.

Section 100.6(c) of Title 34 of the Code of Federal Regulations stipulates that each recipient of Federal financial assistance shall permit access to pertinent sources of information to responsible Department officials or designees. Enclosed is an initial data request. Please provide the requested information to OCR within 15 calendar days of the date of this letter. Please note that this request does not preclude OCR from requesting additional information during the course of the complaint resolution process. After reviewing all information received, OCR will determine whether an on-site investigation is warranted. If so, you will be contacted to arrange a mutually convenient date.

Please be advised that PQC may not harass, coerce, intimidate, or discriminate against any individual because he or she has filed a complaint or participated in the complaint resolution process. If this happens, the complainant may file another complaint alleging such treatment.

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

If you have any questions about this letter, please contact me by phone, at (214) 661-9683, or via email, at (b)(6)@ed.gov. You may also contact Lori Bringas, team leader designee, at (214) 661-9638 or (b)(6)@ed.gov.

Sincerely,

(b)(6)

Camille F. Lacey
Attorney
Office for Civil Rights
Dallas Region VI

Encl.

PRELIMINARY DATA REQUEST

Paul Quinn College (PQC)

Complaint No. 06162100

Response Due: April 7, 2016

To facilitate the resolution of the above-referenced complaint, it is requested that the PQC provide OCR with the following information and/or documentation for the [b6; b7A; b7C] [b6; b7A; b7C] academic years within fifteen (15) calendar days of the date of the attached letter, or **April 7, 2016**. The complainant is identified as [b6; b7A; b7C] [b6; b7A; b7C]

Please note that in this request, the term "correspondence" includes, but is not limited to, e-mail messages, meeting notes, interviews, notes of telephone conversations, and all related memoranda. In each instance where a policy is requested but a written policy on the matter at issue does not exist, provide instead an explanation of the PQC's usual practice.

*Although not required, it would be helpful if the data response is numbered in the lower right-hand corner (e.g., 001, 002) to ensure staff from OCR and the PQC are looking at the same page during any future discussions about this data response.

1. The name and telephone number of the person who has been designated by PQC to assist OCR with the resolution of this complaint.
2. A copy of the following PQC policies, procedures, and documents that have been in effect at any time from [b6; b7A; b7C] to the present. To the extent these documents are available on PQC's website, an appropriate link is sufficient.
 - a. Title IX policies and procedures regarding discrimination based on sex and, if different, policies regarding sexual harassment and sexual violence.
 - b. Grievance procedures for complaints and other avenues for reporting alleged sex discrimination and, if different, sexual harassment and sexual violence. If the PQC has different procedures depending on whether complaints are against students, faculty or staff, provide all procedures.
 - c. The Student, Staff and Faculty Codes of Conduct and any other document(s) that contain the PQC's policies and procedures regarding student, staff and faculty behavior and discipline, including procedures for determining whether the PQC will impose sanctions for sexual harassment and sexual violence.
 - d. Student, staff and faculty handbooks.

3. [b6; b7A; b7C]

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b6; b7A; b7C

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b6; b7A; b7C

f.

g.

h.

i.

j.

k.

15. b6; b7A; b7C

16.

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b6; b7A; b7C

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19. If not already provided in response to any data request above, please provide a copy of the PQC's notice that it will not discriminate against individuals on the basis of sex.
20. Any other information the PQC believes would be helpful in resolving this matter.