

**RESOLUTION AGREEMENT**  
**Northeastern University**  
***OCR Complaint No. 01-16-2143***

Northeastern University (University) has voluntarily entered into this agreement to resolve the allegation in the above-referenced complaint. The University assures OCR that it will take the following actions and will meet its obligation to comply with the requirements of Section 504 of the Rehabilitation Act of 1973 (Section 504), or any other law enforced by OCR.

Prior to the completion of OCR's investigation, the University agreed to resolve the issues of this investigation pursuant to Section 302 of OCR's Case Processing Manual. Accordingly, to resolve the issues of this investigation, the University agrees to take the following actions.

**Action Item 1: DRC Procedures for Alternative Format Materials**

- a. The University will review and revise all policies/procedures and other documentation relating to student requests for alternative format materials, including but not limited to the Disability Resource Center's (DRC) Administrative Policies and Procedures Manual; the Student Services Agreement form; the DRC's website; and any other relevant publications or other documentation (e.g., forms, fliers, etc.) to ensure that the procedures and/or practices detailed therein for processing student requests for alternative format materials are consistent, do not conflict, and contain sufficient information about how to make and respond to such requests.
- b. The University will ensure that the DRC has a system for tracking student requests for alternative format materials. Such tracking system will include the date of the request, the materials requested, the accessible format requested, the date(s) of any follow up with the student regarding the availability of the materials requested; and the date accessible materials were provided to the Student.

**Reporting Requirements**

1. By April 2, 2018, the University will provide OCR with the revised policies/procedures and any other documentation, including but not limited to the DRC Administrative Policies and Procedures Manual, the revised Student Services Agreement form, and the URL for the revised page on the DRC's website for alternative format materials.
2. By April 2, 2018, the University will provide OCR with an explanation of its system for tracking student requests for alternative format materials.

**Action Item 2: Training**

- a. The University will provide training to its DRC Specialists on the DRC's process for responding to student requests for alternative format materials and the DRC's system for tracking such requests.

**Reporting Requirements**

1. By April 30, 2018, the University will certify to OCR that the training required by Action Item 2 has occurred in accordance with this Agreement and will provide copies of all training materials and information on who attended the training.

**Action Item 3: Notice to Instructors**

- a. The University will issue a notice (Notice) to the instructors and professors in the XXXXXXXXXXXXXXXXXXXXXXXXXXXX program (Program) offered by the University's XXXXXXXXXXXXXXXXXXXX. Such Notice will include the following:
  1. Instructors' and professors' obligations to implement the academic adjustments listed in students' Student Services Agreements upon receipt of Professor Notification Letters from the DRC for students in their classes, and the relevant University policies/procedures.
  2. A directive that Program instructors and professors should contact the DRC immediately if they believe that anything in the Student Services Agreements could constitute a fundamental alteration to the Program, an undue burden, or would otherwise present a barrier to implementing the academic adjustment in question.
  3. Contact information for the DRC if an instructor or a professor has questions or concerns about the implementation the academic adjustments in students' Student Services Agreements.
- b. Given that not all Program instructors and professors are located in the same geographic region, the University will electronically circulate the Notice to instructors and professors in the Program, together with relevant policies/procedures. The email conveying this information will include the name and contact information of a DRC staff member(s) who can be a resource to respond to any related concerns or questions.

**Reporting Requirements**

1. By April 2, 2018, the University will provide OCR a copy of the Notice and evidence of its dissemination.
2. By April 30, 2018, the University will provide to OCR an update as to whether any of the Program instructors or professors raised concerns or contacted the DRC with any issues that the University could not resolve internally.

The University understands that by signing this Agreement, it agrees to provide data and other information in a timely manner. Further, the University understands that during the monitoring of this Agreement, if necessary, OCR may visit the University to 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 this Agreement and is in compliance with the regulation implementing Section 504, at 34 C.F.R. Part 104, which was at issue in this case. The University understands that OCR will not close the monitoring of the Agreement until such time that OCR determines the University has fulfilled the terms of the Agreement and is in compliance with the statutes and regulations that were at issue in this case. Upon completion of the obligations under this Agreement, OCR shall close this case.

The University understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10) or judicial proceedings to enforce this Agreement, OCR shall give the University written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

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

By: /s/ \_\_\_\_\_ Date: 2/12/18 \_\_\_\_\_  
Name: Thomas Nedell  
Title: Senior VP and Treasurer