

**Voluntary Resolution Agreement
Goucher College
Case Number 03172083**

In order to resolve the allegations in the above-referenced complaint filed with the U.S. Department of Education, Office for Civil Rights (OCR), under Section 504 of the Rehabilitation Act of 1973 (Section 504) and its implementing regulation at 34 C.F.R. Part 104, Goucher College (the College) voluntarily enters into this Resolution Agreement (Agreement). This Agreement does not constitute an admission of liability on the part of the College and does not constitute a determination by OCR of any violation of any regulations enforced by OCR. The College voluntarily agrees to take the actions set forth below.

Action Steps

- 1) The College hereby reaffirms its commitment under Section 504 to ensure that that no qualified individual with a disability shall, on the basis of disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any College program. The College further reaffirms that, as a recipient of federal funds from the Department, and in accordance with its obligations under regulation implementing Section 504 at 34 C.F.R. §§104.43(a), 104-43(c), and 104.45, it must provide housing to qualified students with a disability in a nondiscriminatory manner and to provide comparable, convenient, and accessible housing to students with disabilities at the same cost as to others. The College also recognizes its obligations to make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless it can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.
- 2) On March 29, 2017, the College distributed to relevant staff members in the College's Office of Residential Life and Office of Accessibility Services, a memorandum reminding them of their obligations under Section 504 to provide housing to qualified students with a disability in a nondiscriminatory manner and to provide comparable, convenient and accessible housing to students with disabilities at the same cost as to others as well as their obligations to make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless it can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

Reporting Requirement: On March 30, 2017 the College submitted to OCR documentation demonstrating that it distributed the memorandum referenced in Action Step #2 above, including the list of all staff, by name and title, who received the memorandum, as well as the College's method of distribution, for OCR review and approval.

- 3) By June 1, 2017, the College will review and revise as necessary all relevant policies, procedures, and practices pertaining to the provision of housing to students with disabilities to reflect that the College does not discriminate in the provision of housing to students with disabilities, and that the College will provide comparable, convenient, and accessible housing to students with disabilities at the same cost as to others and that the College will make reasonable modifications to its housing policies, procedures, and practices when the modifications are necessary to avoid discrimination, unless the

College can demonstrate that making the modifications would fundamentally alter the nature of the housing services provided by the College.

- 4) Within 30 days following notification from OCR that the College's policy referenced in Action Step #3 meets the requirements of Section 504, the College will provide notice to students and relevant staff of modifications to the policy, if any, and will update the policy posted on the College website to include such modifications, if any.

Reporting Requirement: By July 1, 2017, the College will provide OCR with its existing policy, or modified policy, if modifications are required, in accordance with Action Step #3, for OCR's review and approval pursuant to Section 504. Within 60 days of OCR's approval of the policy and modifications, if any, the College will provide OCR with documentation substantiating that it provided written notice of any required modifications to the policy to students, and relevant staff, in accordance with Action Step #4 above, including a copy of the notice sent to students and relevant staff of the modifications, if any, to the policy, and link(s) to the appropriate sections of the College's website containing the policy.

The College understands that by signing this Agreement, it agrees to provide data and other information in a timely manner. Further, the College understands that during the monitoring of this Agreement, OCR may visit the College, interview staff, and students and request such additional reports or data as are necessary for OCR to determine whether the College has complied with the terms of this Agreement and is in compliance with the regulation implementing Section 504, at 34 C.F.R. §§104.43(a), 104.43(c), and 104.45, which were at issue in the case.

The College understands that OCR will not close the monitoring of the Agreement until such time that OCR determines that the College has fulfilled the terms of this Agreement and is in compliance with the regulation implementing Section 504, at 34 C.F.R. §§104.43(a), 104.43(c), and 104.45, which were at issue in the case.

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

/s/

4/3/17

President/Designee
Goucher College

Date