

**Resolution Agreement**  
**IPR College of Creative Arts**  
**OCR Docket No. 05-17-2110**

IPR College of Creative Arts (the College) voluntarily submits this Resolution Agreement (Agreement) to the U.S. Department of Education (the Department), Office for Civil Rights (OCR), to resolve Complaint No. 05-17-2110 and to ensure compliance with Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability by recipients of Federal financial assistance (FFA) such as the College. The College agrees to take the following action steps:

**Disability Accommodation and Discrimination Policies and Procedures**

1. By **September 1, 2017**, the College will review and revise the procedures by which students request and receive academic adjustments and modifications for their disabilities to ensure the policies and procedures comply with the procedural requirements of Section 504, including the regulations implementing Section 504, at 34 C.F.R. § 104.43(a) and 104.44(a). In so doing, the College will ensure that the revised policies and procedures safeguard against informal denials of requests for academic adjustments outside of the process outlined in the College's policies and procedures and the appearance of such informal denials.

**REPORTING REQUIREMENT:** By **September 1, 2017**, the College will provide OCR with a copy of its revised policies and procedures in compliance with Item #1 of this Agreement. OCR will review the revised policies and procedures to ensure that the revisions meet the procedural requirements of Section 504, including the regulations implementing Section 504, at 34 C.F.R. § 104.43(a) and 104.44(a). Within 30 days of OCR's approval of the revised procedures, the College will provide documentation that it has made the changes to all paper and electronic versions of the relevant policies and procedures.

2. By **December 1, 2017**, the College will train each administrator, staff member, and other employee or representative involved in the receipt, evaluation, granting or denial, and implementation of requests for academic adjustments on the College's revised policies and procedures addressed in Item #1, above, and on general compliance with Section 504 as it relates to academic adjustments. The training will caution employees against informally denying requests for academic adjustments and taking actions that may lead students to reasonably understand a request for academic adjustments to have been informally denied.

**REPORTING REQUIREMENT:** By **December 1, 2017**, the College will provide OCR with documentation that it has satisfied Item #2.

3. By **August 1, 2017**, the College will reimburse the Complainant for tuition and costs associated with her attendance at the College during the XXXXXXXXXXXXXXXXXXXX  
XXXXXXXXXXXXXXXXXX.

**REPORTING REQUIREMENT:** By **August 1, 2017**, the College will provide OCR with documentation that it has satisfied Item #3.

4. By **August 1, 2017**, the College will change any failing grades the Complainant received for XXXXXXXXXXXXXXXXXXXXXXXX to grades indicating a withdrawal without failure (a grade of W).

**REPORTING REQUIREMENT:** By **August 1, 2017**, the College will provide OCR with documentation that it has satisfied Item #4.

5. By **August 1, 2017**, the College will remove any reference of expulsion from the Complainant’s transcript. If the Complainant chooses to return to a full program at the College, the College retains the right to consider whether Satisfactory Academic Progress guidelines impact the Complainant’s ability to attend such program at the College.

**REPORTING REQUIREMENT:** By **August 1, 2017**, the College will provide OCR with documentation that it has satisfied Item #5.

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 fulfilled the terms of this Agreement or is in compliance with the regulations implementing Section 504, at 34 C.F.R. §§ 104.43(a) and 104.44(a), which were at issue in this complaint.

The College understands that OCR will not close the monitoring of this Agreement until OCR determines that the College has fulfilled the terms of this Agreement and is in compliance with the regulations implementing Section 504, at 34 C.F.R. §§ 104.43(a) and 104.44(a), which were at issue in this complaint.

The College 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 or judicial proceedings to enforce the specific terms and obligations of this Agreement, OCR shall give the College written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

Approved and agreed to on behalf of the College.

\_\_\_\_\_  
IPR Authorized Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title