

Resolution Agreement
Trinity University
OCR Complaint #06-19-2074

The U.S. Department of Education, Office for Civil Rights, (OCR) and Trinity University (the University) enter into this resolution agreement (Agreement) to voluntarily resolve the above-referenced complaint. This Agreement does not constitute an admission of liability, non-compliance, or wrongdoing by the University. The University assures OCR that it will take the following actions to comply with the requirements of Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, 29 U.S.C. Section 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.

The University will ensure that any new facilities or part of a facility will be constructed in accordance with the U.S. Department of Justice (DOJ) adopted accessibility guidelines. The DOJ's 2010 ADA Standards for Accessible Design, 28 C.F.R. Part 36, Appendix A (2010 Standards) became effective on March 15, 2012. Compliance with the 2010 Standards is required for new construction and alterations that were initiated on or after March 15, 2012. Prior to the 2010 Standards, the effective standards for new construction were the American National Standards Institute, effective June 3, 1977, the Uniform Federal Accessibility Standards (UFAS), effective January 18, 1991, and the 1991 Americans with Disabilities Act Accessibility Guidelines (1991 or ADAAG), effective January 26, 1992.

Unless otherwise noted, all structural changes or modifications to existing facilities pursuant to the Agreement will be in accordance with the technical and scoping requirements of the 2010 Standards referenced above.¹ New and altered facilities (or the identified new or altered part) will be readily accessible to and usable by individuals with disabilities.

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

Action Item #1 – Margarite B. Chapel Self-Evaluation

The University will conduct a self-evaluation of the female restroom(s), accessible route(s), accessible entrance(s), and designated parking lot(s) that serve the Margarite B. Chapel (the Chapel), to determine whether each complies with the governing accessibility standard (i.e., ANSI², UFAS³, 1991 Standards⁴ or the 2010 Standards for accessibility), and whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the female restroom(s), accessible route(s),

¹ The 2010 Standards can be accessed at this DOJ website: www.ada.gov/2010ADASTandards_index.htm.

² American National Standards Institute (ANSI) Standards (A117.1-1961, reaffirmed 1971).

³ Uniform Federal Accessibility Standards (UFAS), <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas>.

⁴ 1991 ADA Standards for Accessible Design (1991 Standards), https://www.ada.gov/1991ADASTandards_index.htm.

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accessible entrance(s), and designated parking lot(s) that serve the Margarite B. Chapel and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:

- i. The governing standard for the Chapel and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when the Chapel and parking lot(s) were last modified.
- ii. With respect to the female restroom(s):
 - a. The width and depth of each accessible toilet stall.
 - b. The width of the doorway to each accessible toilet stall.
 - c. The type of floor surface(s) used in the restroom, including the pile height of any carpet.
- iii. With respect to accessible route(s) and entrance(s):
 - a. The total number of entrances to the Chapel and the location of each accessible entrance to the Chapel.
 - b. The location of any signs indicating the location of each accessible entrance to the Chapel.
 - c. The location of the accessible route(s) from accessible parking spaces, accessible loading zones, and public streets and sidewalks, that serve the Chapel's accessible entrance(s).
 - d. The floor or ground surface; clear width; running slope; and cross slope of the walking surfaces of the accessible route(s) that serve the Chapel's accessible entrance(s).
- iv. With respect to the parking lot(s):
 - a. The number of accessible spots presently.
 - b. The number of van-accessible spots presently.
 - c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
- v. If the identified parking lot(s), entrance(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
- vi. An estimated date to begin the project.
- vii. An estimated date to complete the project, subject to Reporting Requirement 1(c).

(b) **Within 365 days** of the University's submission responsive to Reporting Requirement 1(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.

- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 1(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #2– Christmas Vespers and Open House Self-Evaluation

The University will conduct a self-evaluation of the path of travel used to travel between the Annual Vespers Service at the Chapel to the Open Houses along Oakmont Court, including the entrances to the Open Houses along Oakmont Court, to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the path of travel used to travel between the Annual Vespers Service at the Chapel to the Open Houses along Oakmont Court, including the entrances to the Open Houses along Oakmont Court and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
- i. With respect to the path of travel:
 - a. The location of the path of travel.
 - b. The clear width of the walking surface along the path of travel, taking into account any temporary narrowing of the clear width during the Vespers Service and Open House event due to performance groups occupying sidewalk space.
 - ii. With respect to the Open Houses on Oakmont Avenue:
 - a. The governing standard for each Open House building/ facility at the time the self-evaluation is initiated, including the specific date and year when each building/ facility was last modified.
 - b. The location of each accessible entrance to each building/ facility.
 - c. For each accessible entrance: the type of door or gate, the type of door hardware, the closing speed of each door or gate, the clear width of each doorway or gate, and the maneuvering clearance at each doorway or gate.
 - d. The floor or ground surface, clear width, running slope and cross slope of the walking surfaces on the accessible route(s) that serve the each Open House accessible entrance.
 - iii. If the identified entrances and accessible routes do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - iv. An estimated date to begin the project.

- v. An estimated date to complete the project, subject to Reporting Requirement 2(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 2(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 2(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #3– Marris McLean Hall/ Center for Sciences and Innovation Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s), accessible entrance(s) and parking lot(s) that serve Marris McLean Hall/ Center for Sciences and Innovation (MMH/CSI), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the a the accessible route(s), accessible entrance(s) and parking lot(s) that serve MMH/CSI and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for MMH/CSI and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when MMH/CSI and parking lot(s) were last modified.
 - ii. With respect to accessible route(s) and entrance(s):
 - a. The total number of entrances to the MMH/CSI and the location of each accessible entrance to the MMH/CSI.
 - b. The location of any signs indicating the location of each accessible entrance to the MMH/CSI.
 - c. The location of the accessible route(s) from accessible parking spaces, accessible loading zones, and public streets and sidewalks, that serve the MMH/CSI's accessible entrance(s).
 - iii. With respect to the parking lot(s):
 - a. The number of accessible spots presently.

- b. The number of van-accessible spots presently.
 - c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
- iv. If the identified parking lot(s), entrance(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 3(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 3(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 3(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #4– Laurie Auditorium Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and accessible entrance(s) that serve Laurie Auditorium (the Auditorium), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and accessible entrance(s) that serve the Auditorium and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for the Auditorium at the time the self-evaluation is initiated, including the specific date and year when Auditorium was last modified.

- ii. The total number of entrances to the Auditorium and the location of each accessible entrance to the Auditorium
 - iii. The location of any signs indicating the location of each accessible entrance to the Auditorium
 - iv. The location of the accessible route(s) from accessible parking spaces and public transportation stops, that serve the Auditorium's accessible entrance(s).
 - v. If the identified entrance(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - vi. An estimated date to begin the project.
 - vii. An estimated date to complete the project, subject to Reporting Requirement 4(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 4(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 4(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #5– Coates University Student Center Self-Evaluation

The University will conduct a self-evaluation of the accessible entrances to the Coates University Student Center (the Student Center), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible entrances to the Student Center and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
- i. The governing standard for the Student Center at the time the self-evaluation is initiated, including the specific date and year when Student Center was last modified.
 - ii. The total number of entrances to the Student Center and the location of each accessible entrance to the Student Center

- iii. The location of any signs indicating the location of each accessible entrance to the Student Center.
 - iv. If the identified entrance(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 5(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 5(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 5(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #6– Coates Library Self-Evaluation

The University will conduct a self-evaluation of the accessible routes that serve the Coates Library (the Library), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible routes that serve the Library and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
- i. The governing standard for the Library at the time the self-evaluation is initiated, including the specific date and year when Library was last modified.
 - ii. The location of the accessible route(s) from public transportation stops, that serve the Library's accessible entrance(s).
 - iii. If the identified accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - iv. An estimated date to begin the project.

- v. An estimated date to complete the project, subject to Reporting Requirement 6(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 6(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 6(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #7– Ruth Taylor Concert Hall Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and accessible entrance(s) that serve the Ruth Taylor Concert Hall (the Concert Hall) to determine whether it complies with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and accessible entrance(s) that serve the Concert Hall and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for the Concert Hall at the time the self-evaluation is initiated, including the specific date and year when Concert Hall was last modified.
 - ii. The total number of entrances to the Concert Hall and the location of each accessible entrance to the Concert Hall.
 - iii. The location of any signs indicating the location of each accessible entrance to the Concert Hall.
 - iv. The location of the accessible route(s) from accessible parking spaces, that serve the Concert Hall's accessible entrance(s).
 - v. If the identified entrance(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - vi. An estimated date to begin the project.

- vii. An estimated date to complete the project, subject to Reporting Requirement 7(c).

- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 7(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.

- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 7(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #8– Newman Tennis Center Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and accessible entrance(s) that serve the Newman Tennis Center (the Tennis Center), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and accessible entrance(s) that serve the Tennis Center and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for the Tennis Center at the time the self-evaluation is initiated, including the specific date and year when Tennis Center was last modified.
 - i. The location of the accessible route(s) that serve the Tennis Center's accessible entrance(s).
 - ii. The total number of entrances to the Tennis Center and the number and location of each accessible entrance to the Tennis Center.
 - iii. The location of the accessible route(s) from the Tennis Center's accessible entrance(s) to the tennis courts and bleachers.
 - iv. If the identified accessible route(s) and entrances do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.

- vi. An estimated date to complete the project, subject to Reporting Requirement 8(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 8(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 8(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #9– Trinity Football and Track & Field Stadium Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and parking lots that serve the Trinity Football and Track & Field Stadium (the Stadium) and designated parking lot(s), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and parking lots that serve the Stadium and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for the Stadium and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when the Stadium and parking lot(s) were last modified.
 - ii. With respect to accessible route(s):
 - a. The location of the accessible route(s) from accessible parking spaces and public sidewalks, that serve the Stadium's accessible entrance(s).
 - b. The location of accessible route(s) that connects the Stadium to accessible buildings, accessible facilities, accessible elements and accessible spaces on the site.
 - iii. With respect to the parking lot(s):
 - a. The number of accessible spots presently.
 - b. The number of van-accessible spots presently.

- c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
 - iv. If the identified parking lot(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 9(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 9(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 9(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #10– Bell Athletic Center Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and parking lots that serve the Bell Athletic Center (the Athletic Center), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and parking lots that serve the Athletic Center and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for the Athletic Center and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when the Athletic Center and parking lot(s) were last modified.
 - ii. With respect to accessible route(s):

- a. The location of the accessible route(s) from accessible parking spaces and public sidewalks, that serve the Athletic Center's accessible entrance(s).
 - b. The location of accessible route(s) that connects the Athletic Center to accessible buildings, accessible facilities, accessible elements and accessible spaces on the site.
 - iii. With respect to the parking lot(s):
 - a. The number of accessible spots presently.
 - b. The number of van-accessible spots presently.
 - c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
 - iv. If the identified parking lot(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 10(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 10(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 10(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #11– Mabee Dining Hall Self-Evaluation

The University will conduct a self-evaluation of the evaluation of the accessible route(s) and parking lots that serve the Mabee Dining Hall, to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

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- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and parking lot(s) that serve the Mabee Dining Hall and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
- i. The governing standard for the Mabee Dining Hall and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when the Mabee Dining Hall and parking lot(s) were last modified.
 - ii. With respect to accessible route(s):
 - a. The location of the accessible route(s) from accessible parking spaces and public sidewalks, that serve the Mabee Dining Hall's accessible entrance(s).
 - b. The location of accessible route(s) that connects the Mabee Dining Hall to accessible buildings, accessible facilities, accessible elements and accessible spaces on the site.
 - iii. With respect to the parking lot(s):
 - a. The number of accessible spots presently.
 - b. The number of van-accessible spots presently.
 - c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
 - iv. If the identified parking lot(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 11(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 11(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 11(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #12– Winn, Calvert and McLean Residence Halls Self-Evaluation

The University will conduct a self-evaluation of the accessible routes that serve the Winn, Calvert and McLean Residence Halls (the Residence Halls), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the of the accessible routes that serve the Residence Halls and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for each of the Residence Halls at the time the self-evaluation is initiated, including the specific date and year when the Residence Halls were last modified.
 - ii. The location of accessible route(s) that connects the Residence Halls to accessible buildings, accessible facilities, accessible elements and accessible spaces on the site.
 - iii. If the identified accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - iv. An estimated date to begin the project.
 - v. An estimated date to complete the project, subject to Reporting Requirement 12(c).

- (b) **Within 365 days** of the University’s submission responsive to Reporting Requirement 12(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.

- (c) **Within 545 days** of the University’s submission responsive to Reporting Requirement 12(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #13– Thomas Residence Hall Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) from accessible parking spaces to the Thomas Residence Hall, to determine whether they comply with the governing accessibility standard

(i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) from accessible parking spaces to the Thomas Residence Hall and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
- i. The governing standard for the Thomas Residence Hall at the time the self-evaluation is initiated, including the specific date and year when the Thomas Residence Hall was were last modified.
 - ii. The location of the accessible route(s) from accessible parking spaces that serve the Thomas Residence Hall's accessible entrance(s).
 - iii. If the identified accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - iv. An estimated date to begin the project.
 - v. An estimated date to complete the project, subject to Reporting Requirement 13(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 13(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 13(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #14– McFarlin Lounge Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and parking lot(s) that serve the McFarlin Lounge (the Lounge), to determine whether they comply with the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and parking lot(s) that serve the Lounge and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
- i. The governing standard for the Lounge and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when the Lounge and parking lot(s) were last modified.
 - ii. The location of the accessible route(s) from accessible parking spaces and public sidewalks stops that serve the Lounge's accessible entrance(s).
 - iii. With respect to the parking lot(s):
 - a. The number of accessible spots presently.
 - b. The number of van-accessible spots presently.
 - c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
 - iv. If the identified parking lot(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 14(c).
- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 14(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.
- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 14(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

Action Item #15– Alumni Relations and Development Center Self-Evaluation

The University will conduct a self-evaluation of the accessible route(s) and parking lot(s) that serve the Alumni Relations and Development Center (the Alumni Center), to determine whether they comply with

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the governing accessibility standard (i.e., ANSI, UFAS, 1991 Standards or the 2010 Standards for accessibility), and to determine whether modifications are required to comply with the accessibility standards. The University will make such modifications as are required to comply with accessibility standards.

- (a) **Within 120 days** of the signing of this Agreement, the University will submit to OCR a detailed report documenting its self-evaluation of the accessible route(s) and parking lot(s) that serve the Alumni Center and its Action Plan for correcting any compliance problems found during the self-evaluation. The report shall include, *but not be limited to*, the following:
 - i. The governing standard for the Alumni Center and designated parking lot(s) at the time the self-evaluation is initiated, including the specific date and year when the Alumni Center and parking lot(s) were last modified.
 - ii. The location of the accessible route(s) from accessible parking spaces, and public transportation stops that serve the Alumni Center's accessible entrance(s).
 - iii. With respect to the parking lot(s):
 - a. The number of accessible spots presently.
 - b. The number of van-accessible spots presently.
 - c. If the parking lot does not meet the governing accessibility standard, the number of accessible spots, including van accessible spots, necessary for compliance with the 2010 Standards.
 - d. A description of the necessary modifications for ramps, accessible lanes, and other renovations besides accessible spots to ensure compliance.
 - iv. If the identified parking lot(s) and accessible route(s) do not meet the governing accessibility standard, a description of necessary modifications and other renovations to ensure compliance with the 2010 Standards.
 - v. An estimated date to begin the project.
 - vi. An estimated date to complete the project, subject to Reporting Requirement 15(c).

- (b) **Within 365 days** of the University's submission responsive to Reporting Requirement 15(a) above, the University will submit a written report to OCR summarizing the actions the University has taken thus far regarding its Action Plan to comply with this Agreement. The report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices and proof of efforts to secure funding/assistance for structural renovations or equipment.

- (c) **Within 545 days** of the University's submission responsive to Reporting Requirement 15(a) above, the University will submit a report to OCR reflecting the University has completed all modifications under its Action Plan. This report shall include, for example, detailed photographs or videos showing the relevant measurements of any alterations or renovations, architectural plans, work orders, purchase orders, invoices, proof of efforts to secure

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funding/assistance for structural renovations or equipment, and other such documentation demonstrating full implementation of the Action Plan in compliance with Section 504.

The University understands that OCR will not close the monitoring of this agreement until OCR determines that the recipient has fulfilled the terms of this agreement and is in compliance with the regulations implementing Section 504.

The University also understands that by signing this Agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the Agreement. Further, the University understands that during the monitoring of the Agreement, if necessary, OCR may visit the University, interview staff and students, and request such additional reports or data as necessary for OCR to determine whether the University has fulfilled the terms of the Agreement. Upon the University's satisfaction of the commitments made under the Agreement, OCR will close the 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 proceeding 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.

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

Danny J. Anderson, Ph.D., President
Trinity University

Date