

RESOLUTION AGREEMENT
Baylor University
Complaint Number 06-19-2144

The U.S. Department of Education (Department), Office for Civil Rights (OCR), and Baylor University (University) enter into this agreement to resolve the allegations in 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, consistent with its obligation to comply with the requirements of Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, 29 U.S.C. § 794, and its implementing regulation, at 34 C.F.R. Part 104, which prohibits discrimination on the basis of disability by recipients of Federal financial assistance.

Prior to the completion of OCR's investigation, the University agreed to resolve the issues in 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

By December 30, 2020, the Baylor Alumni Network ("Network") will revise, develop, and adopt, as necessary, policies and procedures designed to ensure that alumni events and activities, including those held at non-university venues, do not have the effect of discriminating against individuals with disabilities because the venues are not accessible to such individuals under the U.S. Department of Justice (DOJ) 2010 ADA Standards for Accessible Design, 28 C.F.R. Part 36, Appendix A ("2010 Standards") or other comparable accessibility standards.

Action Item 2

By December 30, 2020, the Association will provide training to all Network staff engaged in the procurement, negotiation and contracting of venues leased for Network events. Specifically the training will cover 1) any new or revised policies and/or procedures developed pursuant to Action Item 1; 2) the Section 504 prohibition against discrimination on the basis of disability in the University's provision of any aid, benefit, or service, including through contractual, licensing, or other arrangements, as described at 34 C.F.R. § 104.4; and 3) an overview of the accessibility requirements pursuant to Section 504 and the 2010 Standards or comparable standards regarding accessible routes, access ramps and restrooms. The training will be conducted by an individual knowledgeable about the laws discussed.

Reporting Requirements

- 1) **By December 15, 2020**, the University will provide a report to OCR documenting its actions to develop or revise Network policies and procedures consistent with Action Item 1.

- 2) **By December 15, 2020**, the University will submit to OCR, for review and approval, its proposal for complying with Action Item 2 above. Specifically, the University will provide to OCR the name(s) and credentials of the individual(s) who it proposes to conduct the training session(s), and copies of the proposed materials the University intends to use at the training session(s).
- 3) **Within 30 days** of OCR's approval of the individual(s) to conduct the training and materials referenced in Reporting Requirement 2, the University will provide the training described in Action Item 2 above.
- 4) **Within 30 days** of the completion of the training referenced above, the University will provide OCR with documentation demonstrating that it has timely completed Action Item 2 above. Specifically, the University will provide to OCR the names of all individuals who attended the training session(s), the date(s) and time(s) the training session(s) occurred, the name(s) and credentials of the individual(s) who conducted the training session(s), and copies of the materials disseminated at the training session(s).

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 this agreement. Further, the University understands that during the monitoring of this agreement, if necessary, OCR may visit the University, interview staff, 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 regulations implementing Section 504. Upon completion of the obligations under this Agreement, OCR shall close and dismiss 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 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.

Xxx xxxxx xx xxxxxxxxxxxx, President
Baylor University

Date