

RESOLUTION AGREEMENT
Grand Canyon University
Case Number 08-22-2059

Grand Canyon University (the University) voluntarily enters into this agreement to resolve the allegation in the above-referenced complaint. This agreement does not constitute an admission of liability, non-compliance, or wrongdoing by the University, and the University affirmatively states that it fully complied with the law in this matter. The University assures the U.S. Department of Education, Office for Civil Rights (OCR), that it will take the following actions to comply with the requirements of Section 504 of the Rehabilitation Act of 1973 and its implementing regulation, which prohibit discrimination on the basis of disability in programs and activities funded by the U.S. Department of Education.

1. The University will submit its procedures for the provision of accommodations, including housing accommodations, for students with disabilities to OCR for its review to ensure that the procedures comply with Section 504, including the regulation at 34 C.F.R. § 104.45.

REPORTING REQUIREMENT 1: Within 60 days of the date this Agreement is signed, the University will submit to OCR a copy of its Section 504 procedures for OCR's review and comments.

2. The University will consider and respond to any feedback from OCR with respect to the procedures referenced in Item 1. After obtaining OCR's approval, the University will officially adopt and implement any new or amended procedures that may be required and ensure that students have adequate notice of how to request accommodations, including housing accommodations.

REPORTING REQUIREMENT 2: Within 45 days of obtaining OCR's approval of the procedures, the University will provide OCR with documentation showing that any new or amended procedures have been officially adopted; confirming that they have been implemented; and showing how students are informed of the process for requesting accommodations. If OCR does not require any revisions to the University's Section 504 procedures, this Reporting Requirement 2 will not be required. If any of the necessary documentation for Reporting Requirement 2 has already been provided to OCR pursuant to Reporting Requirement 1, the documentation does not need to be provided again.

3. The University will develop training¹ to be provided all University faculty, staff and administrators who are involved in the process of evaluating requests for and making decisions about accommodations due to a disability including, at minimum, all SDS representatives, at least one individual involved in housing assignments, and individuals involved in investigating and resolving Section 504 grievances. The training will cover the University's procedures approved by OCR pursuant to Item 2 and the University's

¹ The University may select its preferred format for the training (e.g., in person, online, video, etc.), as long as it can document that the necessary content was included and that the required individuals participated. The University may also hold multiple training sessions to accommodate participants' schedules or for other reasons deemed appropriate by the University.

obligations to provide housing accommodations in accordance with Section 504 and its implementing regulations.² The training may cover, at the University's discretion, additional topics that are relevant to the specific group of individuals receiving the training.

REPORTING REQUIREMENT 3: Within 45 days of receiving OCR's notice of approval of the procedures referenced in Item 2, the University will submit to OCR the name and qualifications of the proposed trainer, a proposed training agenda or agendas, and a list of individuals (either names or positions or both) identified to participate in the training.

4. The University will consider and respond to any feedback from OCR with respect to the proposed training materials referenced in Item 3. After obtaining OCR's approval, the University will provide the training to the individuals identified in Item 3.

REPORTING REQUIREMENT 4: Within 45 days of obtaining OCR's approval of the training materials referenced in Item 3, the University will provide documentation that the training has been provided to all individuals identified in Item 3. The documentation will include, at minimum, the name of the person who provided the training, the date(s) the training was conducted, and the names and titles of the staff in attendance and include a copy of any materials used or disseminated during the training.

5. The University will draft a letter to the Complainant that includes the following:
 - Instructions and upcoming deadlines for requesting a housing assignment (including options for Spring 2023 and options for Fall 2023);
 - Instructions for requesting housing accommodations;
 - An assurance that the University will engage in an interactive process with the Complainant to understand her disability-related needs and make an individualized and fact-specific determination about any requested accommodations;
 - A reminder of the Complainant's obligation to engage in an interactive process with the University;
 - An explanation of how the Complainant can receive support in identifying potential roommates, reaching agreements with roommates, or requesting new roommates, if necessary; and
 - Designation of a specific staff member from Student Disability Services who will engage with the Complainant in the interactive process and provide other additional information regarding housing accommodations, as needed.

REPORTING REQUIREMENT 5: Within 30 days of the date this Agreement is signed, the University will submit to OCR a copy of the proposed letter to the Complainant.

6. The University will consider and respond to any feedback from OCR with respect to the proposed letter referenced in Item 5. After obtaining OCR's approval, which shall be

² The University may also have obligations to provide housing accommodations pursuant to Title III of the Americans with Disabilities Act and the Fair Housing Act, which are enforced by the Department of Justice and the Department of Housing and Urban Development, respectively.

provided promptly to ensure that the Complainant receives information in an appropriate timeframe, the University will send the letter to the Complainant.

REPORTING REQUIREMENT 6: Within 15 days of receiving OCR’s approval of the letter referenced in Item 5, the University will provide documentation to OCR showing that the letter was sent via email to the Complainant.

By signing the resolution agreement, the University agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the resolution agreement. During the monitoring of the resolution agreement, if necessary, OCR may visit the University, 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 the resolution agreement.

The University understands that OCR will not close the monitoring of the agreement until such time as OCR determines that the University is in compliance with the terms of the agreement and 34 C.F.R. § 104.43 and § 104.45.

The University understands that OCR may initiate administrative enforcement proceedings or refer the case to the Department of Justice (DOJ) for judicial proceedings in the event of breach. Before initiating such proceedings, OCR will give the University written notice of the alleged breach and 60 calendar days to cure the alleged breach.

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

For Grand Canyon University:

/s/

11/7/2022

Name/Title

Date