

**Resolution Agreement
North Adrian's Beauty College
Case Number 09-14-2205**

In order to resolve the compliance issues identified during the investigation of the above-referenced complaint filed with the U.S. Department of Education, Office for Civil Rights (OCR), the North Adrian's Beauty College (College) agrees to take the actions outlined in this Resolution Agreement (Agreement).

I. Provisions

- A. The College will revise its statement of nondiscrimination so that it includes a statement identifying the responsible employee or employees who have been designated to handle inquiries regarding its age non-discrimination policy. The statement will include the responsible employee(s) name or title, address, and telephone number.

- B. By 9/4/2014, the College will provide OCR with the proposed changes to the statement of nondiscrimination. OCR will review and approve or require changes within 30 days of receipt. Within 10 days of receiving final approval from OCR, the College will provide OCR with documentation that the changes have been adopted. By 10/10/2014, the College will provide OCR with copies of the applicable pages from its revised publications that contain the revised statement of nondiscrimination. By 10/10/2014, the College will provide OCR with web links showing that the College's website has been updated with the statement of nondiscrimination.

- C. The College will revise existing policies and procedures or develop policies or procedures that provide for the prompt and equitable resolution of complaints of age discrimination, including harassment, so that they are consistent with the requirements of 34 C.F.R. §110.25(c). The College may address these issues in a single grievance procedure, or in separate procedures, so long as all age discrimination grievance procedures comply with the following:
 - 1. Provide notice of the procedures to students, including where to file complaints, that is easily understood, easily located, and widely distributed.
 - 2. Clearly state that the procedures apply to complaints alleging age discrimination carried out by employees, other students, or third parties.
 - 3. Provide for the adequate, reliable, and impartial investigation of complaints, including an equal opportunity to present witnesses and other relevant evidence.

4. Clearly state that an informal process to resolve the complaint is optional, that a complainant is not required to complete an informal resolution step before filing a formal complaint of age discrimination, and that a complainant may end any such informal process at any time.
 5. Clearly state that at any stage of complaint resolution, a complainant will not be required to meet with or otherwise confront any individual the complainant has accused of engaging in age discrimination.
 6. Include provisions ensuring that individuals who play a role in the receiving, investigating, or otherwise processing of student complaints of age discrimination do not have any actual or perceived conflicts of interest in the process.
 7. Provide designated and reasonably prompt timeframes for major stages of the complaint process, as well as the process for extending timeframes.
 8. Provide written notice to the parties of the outcome of the complaint.
 9. Provide an assurance that steps will be taken to prevent recurrence of any discrimination and to correct its effects on the complainant and others, if appropriate.
- D. By 9/4/2014, the College will provide OCR with the proposed changes to the discrimination grievance procedures. OCR will review and approve or require changes within 30 days of receipt. Within 30 days of receiving final approval from OCR, the College will provide OCR with documentation that the changes have been adopted. By 10/10/2014, the College will provide OCR with copies of the applicable pages from its revised publications that contain the revised procedures. By 10/10/2014, the College will provide OCR with web links showing that the College's website has been updated to include a link to the procedures.
- E. By 10/10/2014, the College will provide training to all administrators, faculty, and other staff who are involved in the resolution of complaints of age discrimination. Areas to be addressed in the training include:
1. The revised provisions of the grievance procedures, including the complaint procedures and process for individuals who allege age discrimination.
 2. Investigation of allegations of age discrimination, including harassment.
- F. Within fifteen days of the completion of the training, the College will provide to OCR verification of the training, and a copy of the sign-in sheets for the training,

a statement identifying the trainer and his or her qualifications, and a copy of all material distributed or discussed at the training.

II. MONITORING

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 the Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 *et seq.*, (AgeDA) at 34 C.F.R. §§110.10 and 110.25, which were at issue in this case.

The College 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 College understands that during the monitoring of this Agreement, if necessary, 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 and is in compliance with the regulations implementing the AgeDA, at 34 C.F.R. §§110.10 and 110.25, which were at issue in this case.

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 (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 a minimum of sixty (60) calendar days to cure the alleged breach.

_____/s/_____
Rebecca Abinales
College Vice-President

8/11/2014
Date