

**Resolution Agreement**  
**Alliant International University**  
**OCR Case Number 09-14-2380**

Alliant International University (University), without admitting to any violation of law, agrees to implement the following provisions in this Resolution Agreement to resolve the issues investigated by the Office for Civil Rights, U.S. Department of Education (OCR), under Section 504 of the Rehabilitation Act (Section 504) and the Age Discrimination Act of 1975 (AgeDA) in the above-referenced complaint.

**I. Individual Remedies**

Within five calendar days of the date of this agreement, the University will initiate a formal investigation of the complainant's allegations of disability and age discrimination.

- A. The University will follow the formal written unlawful discrimination complaint provisions outlined in its Graduate Student Handbook under the section *Formal Complaint Mechanism: Filing a Grievance* to investigate the complainant's allegations of discrimination.
- B. Within sixty-five calendar days of the date of this agreement, the University will provide OCR with a summary of its investigation, a copy of all supporting documents, and a draft copy of its response to the allegations raised by the complainant prior to issuing its response. OCR and the University will communicate about the University's investigatory process, and OCR will provide feedback to the University about its investigatory process and its proposed response to the complainant before the University issues its response.
- C. Within five calendar days of approval by OCR, the University will issue its response to the complainant, and will simultaneously notify OCR in writing that it has done so.

**II. Guidance Memorandum**

- A. By May 1, 2015, the University will provide OCR with a draft guidance memorandum, which clarifies the process for resolving discrimination complaints filed in the context of an academic appeal, for review and comment.
- B. Within fifteen calendar days of receiving OCR's approval of the guidance memorandum, the University will distribute the guidance memorandum to all University employees responsible for processing and/or resolving discrimination complaints, with a copy to OCR within five calendar days of the distribution to University employees.

### **III. Monitoring**

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

The University 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 students, 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 in compliance with Section 504 and the AgeDA.

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 proceedings to enforce this Agreement, OCR shall give the University written notice of the alleged breach and a minimum of sixty (60) calendar days to cure the alleged breach.

\_\_\_\_\_/s/\_\_\_\_\_  
Alliant International University  
Vice President, Student Services

\_\_\_\_\_  
02/06/2015  
Date