Resolution Agreement
Charles Drew University
OCR Complaint No. 09-15-2128

In order to resolve the above-referenced complaint filed with the U.S. Department of Education, Office for Civil Rights (OCR) against Charles Drew University (“University”) pursuant to the Age Discrimination Act of 1975 (AgeDA), 42 U.S.C. 6101et seq., and its implementing regulation, at 34 C.F.R. Part 110, the University agrees to take the actions in this Resolution Agreement (Agreement).

I. Age Discrimination Act (AgeDA) Grievance Procedures

a. The University will adopt and publish grievance procedures that provide for the prompt and equitable resolution of complaints of age discrimination. The procedures will, at a minimum, provide for an adequate, reliable, and impartial investigation of complaints of discrimination and notice to the parties of the outcome.

b. Reporting Requirements

   i. By July 31 2019, the University will provide for OCR’s review and approval a draft of the University’s age discrimination grievance procedures.

   ii. Within 45 calendar days of written notification from OCR of its approval of the grievance procedures, the University will provide written confirmation to OCR that the procedures were adopted and published. The University will provide OCR with copies of, and/or links to, information provided to students, faculty, and staff concerning the grievance procedures.

II. Training

a. Within 60 days after the AgeDA grievance procedures are adopted, the University will provide training to Nursing Program administrators on how to respond to complaints of discrimination on the basis of age. The training will, at minimum, include the following components:

   i. A general overview of the AgeDA, including how the law’s nondiscrimination provisions apply to students;

   ii. How to recognize a complaint of age discrimination by employees, other students, or third parties;

   iii. The requirements of the University’s age discrimination grievance procedures and the University’s duty to immediately investigate all allegations of possible discrimination and provide a notice of outcome.
b. Reporting Requirements  
   i. Within 30 days after the training is provided, the University will submit training documentation to OCR, which may be sign in sheets and or staff rosters and copies of training materials.

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 and obligations of this 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 proceedings to enforce the specific terms and obligations of the resolution agreement and/or the applicable statute(s) and regulation(s). Before initiating such proceedings, OCR will give the University written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

/s/  
General Counsel  
Charles Drew University  
05/30/2019  
Date