Resolution Agreement  
Santa Clara University  
Case Number 09-17-2584

Santa Clara University (University), without admitting to any violation of law, agrees to implement this Resolution Agreement (Agreement) to resolve the compliance concerns identified by the U.S. Department of Education, Office for Civil Rights (OCR), under Title IX of the Education Amendments of 1972 and Title VI of the Civil Rights Act of 1964.

1. The University agrees to develop a pool of investigators who have received training and are available to conduct discrimination complaint investigations to ensure that there are adequate resources in place to ensure prompt investigations and responses, taking into account the complexity of each complaint.

2. For the 2017-18 academic year, beginning the first day of instruction on August 14, 2017, the University will conduct a review of complaints/reports of and the timeline for resolution of all discrimination complaints made by students, including the timeline for each of the stages in the process, to determine whether any changes to policy or practice are needed to ensure a prompt resolution of the complaints/reports.

Reporting Requirements

1. By June 1, 2018, the University will provide OCR with description of actions taken to increase the pool of investigators and provide relevant training, including the names and positions of additional investigators who were added to the pool, and a description of any training provided to them regarding how to conduct investigations alleging discrimination on a protected basis.

2. By July 31, 2018, the University will provide OCR with a summary of the results of the review described under 2), including its assessment of whether the resolution process was prompt. The University will provide any proposals for addressing concerns identified as a result of this review to OCR for review and approval.

Monitoring

The University understands that by signing this Agreement, it agrees to provide data and other information in a timely manner. Further the University understands that during the monitoring of this Agreement, 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 is in
compliance with Section 504, Title II, and their implementing regulations, which were at issue in this case. 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 proceedings 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.

/s/ ____________________________ January 9, 2018
Michael Engh, President Date