

Resolution Agreement
American Beauty College
OCR Case No. 09-19-2144

In order to resolve the findings made with respect to the above-referenced complaint to the U.S. Department of Education, Office for Civil Rights (OCR) under Section 504 of the Rehabilitation Act of 1973 (Section 504), and Title IX of the Education Amendments of 1972 (Title IX), and their implementing regulations, American Beauty College (the School) agrees to take the actions outlined in this Resolution Agreement (Agreement).

I. Title IX Grievance Procedure

The School will adopt and publish a grievance procedure providing for the prompt and equitable resolution of student and employee complaints alleging any action covered under Title IX.

II. Title IX Memorandum and Training

- A. The School will distribute a written guidance memorandum on its Title IX policies and procedures for all School staff. The guidance memorandum will include an explanation of the issues covered by Title IX, a description of the School's revised Title IX policies and procedures, information about the Title IX Coordinator, an explanation of how to respond to a Title IX complaint or inquiry, and what to do if a Title IX concern comes to an individual's attention.
- B. All School administrators and any other School employees who the School identifies as having responsibilities involving Title IX compliance will attend training conducted by OCR or by an expert in Title IX selected by the School. The training will cover sexual harassment, the School's general responsibilities under Title IX, and the duty to respond to allegations of sexual or gender-based harassment.

III. Section 504 Training

- A. The School will distribute a written guidance memorandum for all School staff regarding the School's obligations under Section 504. The guidance memorandum will include an explanation of qualifying disabilities, the types of accommodations that can be offered to students, and the School's obligations to engage in an interactive process regarding a student's requests for a disability accommodation.
- B. All School staff will participate in an in-person training conducted by OCR or by an expert in Section 504 selected by the School. The training will address disability accommodations for students, including students with mental illness, along with the School's obligations under Section 504 and the School's responsibility to engage in an interactive process regarding Student requests for a disability accommodation.

IV. Student's Transcript

By February 14, 2020, the School will provide the Student with a copy of her transcript and provide OCR with documentation showing that it was provided to the Student.

V. Reporting

1. By August 31, 2020, pursuant to Section I, the School will submit a draft of its Title IX grievance procedure for OCR's review and approval. Within 30 days of OCR's approval of the procedure, the School will adopt and publish the revised procedure and provide OCR with documentation showing that it has done so.
2. By August 31, 2020, the School will provide OCR with a draft of the guidance memorandum developed pursuant to Section II.A. Within 30 days after receiving OCR's approval of the memorandum, the School will distribute the guidance memorandum. The School will provide OCR with documentation of the distribution of the memorandum within 30 days of its distribution.
3. By August 31, 2020, the School will submit a draft of its plan to provide the Title IX training described in Section II.B for OCR's review and approval. If the School decides to request OCR staff for such training, that request will be included in the plan. If School decides to have training provided by another individual or organization, the name and credentials of the expert and the draft training materials will also be provided to OCR for review and approval. Within 30 days of conducting the training, the School will provide documentation to OCR that the training has been completed, including a sign-in sheet of the participants, a list of any participants who have not yet received the training, the date of the training, the length of the training, the name of the person who conducted the training, and a copy of the materials used.
4. By August 31, 2020, the School will provide OCR with a draft of the guidance memorandum developed pursuant to Section III.A. Within 30 days after receiving OCR's approval of the memorandum, the School will distribute the guidance memorandum. The School will provide OCR with documentation of the distribution of the memorandum within 30 days of its distribution.
5. By August 31, 2020, the School will submit a draft of its plan to provide the Section 504 disability training described in Section III.B for OCR's review and approval. If the School decides to request OCR staff for such training, that request will be included in the plan. If School decides to have training provided by another individual or organization, the name, credentials, and draft training materials will also be provided to OCR for review and approval. Within 30 days of conducting the training, the School will provide documentation to OCR that the training has been completed, including a sign-in sheet of the participants, a list of any participants who have not yet received the training, the date of the training, the length of the training, the name of the person who conducted the training, and a copy of the materials used.

VI. Monitoring

The School understands that by signing this Agreement, it agrees to provide data and other information in a timely manner. Further the School understands that during the monitoring of this Agreement, OCR may visit the School, interview staff and students and request such additional reports or data as are necessary for OCR to determine whether the School has fulfilled the terms

of this Agreement and is in compliance with Title IX, Section 504 and 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 School 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 School written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

_____/s/_____

Angelyne Roman
American Beauty College

_____02/13/2020_____

Date