

**Resolution Agreement**  
Life Chiropractic College West  
OCR Case Number 09-20-2282

Life Chiropractic College West (College), 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 Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. §794, and its implementing regulation, at 34 C.F.R. Part 104, in the above-referenced OCR case number.

**I. College Policies**

The College will review and revise its Student Catalog and Handbook to add a statement to the Adding from Ahead Policy (Policy) that a modification of the Policy will be considered for students with disabilities when requested. The College will also review and revise its publications to ensure consistency in identifying the College's Section 504, Disability Services, and/or ADA coordinator.

*Reporting Requirement:*

By July 1, 2021, the College will submit a draft of its revised Student Catalog and Handbook (and, as described below, its draft email to all staff and students regarding its Policy revisions) to OCR for review and approval. Within 45 days of receiving OCR's approval, the College will: post the revised Student Catalog and Handbook on its website; send an email to all staff and students informing them that the Policy has been revised and including links to the revised Student Catalog and Handbook; and provide OCR with documentation that the approved email has been circulated.

**II. Section 504 Training**

The College will provide Section 504 training to all staff and administrators who are involved in determining, reviewing, or resolving requests for academic adjustments for students with disabilities. The training will cover, at the minimum, the College's obligations under Section 504: to provide academic adjustments to students with a disability, including modifications to academic requirements that are necessary to ensure that such requirements do not discriminate, or have the effect of discriminating, against qualified students with a disability; and to engage in an interactive process with students with a disability concerning their disability and related needs.

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### *Reporting requirements:*

By August 1, 2021, the College will submit a draft of the proposed training materials and the name/title of the proposed trainer(s) for OCR review and approval; in the event that the College intends to provide its staff and administrators with a preprogrammed online training, the College will submit for OCR review and approval information regarding the training, including the name/title of the trainer(s), any training materials made available to the College, and a summary of the material to be covered. The College will provide the training within 60 days of OCR's approval. Within 14 days of providing the training, the College will provide OCR with the following documentation: the dates of the training, the names and titles of the trainer(s) (and, if applicable, the name of the online course), a copy of any materials used or distributed during the training, sign-in sheets (or other documentation, such as training certificates) evidencing the College employees who attended the training, a list of the required College employees who did not attend, and a plan for providing follow-up for those employees who did not attend, as needed.

### **III. Complainants' Remedy**

By June 15, 2021, the College will initiate and engage in an interactive process with the complainants to discuss whether they would like a modification of course load/sequence as an academic adjustment, and if so, what documentation (if any) needs to be submitted to support their request. In addition, the College will engage in an interactive process with the complainants to discuss, more broadly, the complainants' satisfaction with their academic adjustments to date, and whether they desire any additional academic adjustments to remedy the effects of the compliance concerns identified by OCR in this case.

### *Reporting Requirement:*

By July 15, 2021, the College will provide documentation of its contact(s) and interactive process with the complainants, including who, on behalf of the College, engaged in the interactive process, what information was discussed and considered, the outcome of the interactive process.

### **General Provisions:**

The College understands that by signing the Agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the Agreement. Further, the College understands that during the monitoring of the 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 and obligations of the Agreement. Upon the College's satisfaction of the commitments made under the Agreement, OCR will close the case.

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The College understands and acknowledges that OCR may initiate proceedings to enforce the specific terms and obligations of the Agreement and/or the applicable statute(s) and regulation(s). Before initiating such proceedings, OCR will give the College written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

\_\_\_\_\_/s/\_\_\_\_\_

NAME

TITLE

Life Chiropractic College West

\_\_\_\_\_04/26/2021\_\_\_\_\_

Date