

**Hiram College
Resolution Agreement
OCR Docket #15-19-2026**

Hiram College (the College) voluntarily submits this Resolution Agreement (Agreement) to the U.S. Department of Education, Office for Civil Rights (OCR), for the purpose of resolving the above-referenced complaint and ensuring the College's compliance with 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.

While not admitting to any violation, the College wishes to demonstrate its ongoing commitment to supporting students with disabilities. To do so, the College agrees to take the following actions:

1. By **December 6, 2021**, the College will designate an employee with training and expertise in Section 504 to coordinate the College's efforts to comply with Section 504 including handling complaints of disability discrimination and harassment made by or against students, employees and third parties. The College will publish this individual's name or title, office address, and telephone number consistent with the requirements of the Section 504 implementing regulation at 34 C.F.R. § 104.7(a), including by posting this individual's name or title and contact information in a prominent location on the College's website.
2. By **December 6, 2021**, the College will submit to OCR a statement that describes the job duties, qualifications, and training requirements for the Section 504 Coordinator. The College will ensure that the designated Section 504 Coordinator has been trained on his or her job duties.

Reporting Requirement: By **December 13, 2021**, the College will provide OCR with the name and qualifications of the Section 504 Coordinator designated pursuant to Action Step 1, a description of how the identity and contact information for the Section 504 Coordinator was published, a copy of the statement of the Section 504 Coordinator's job duties and documentation demonstrating that the Section 504 Coordinator was trained on the job duties of that position as required by Action Step 2.

3. By **December 13, 2021**, the College will submit to OCR for its review and approval updated disability discrimination grievance procedures that provide for the prompt and equitable resolution of student, employee, and third party complaints alleging any action which would be prohibited by the Section 504 regulation, including disability discrimination and harassment, as required by 34 C.F.R. § 104.7(a). The procedures will provide, at a minimum:
 - a. Notice to students, employees, and members of the public of the procedures, including a statement that the procedures apply to complaints of disability discrimination, including disability harassment, made by and against students, employees, or third parties;

- b. A description of how to file a formal complaint of disability discrimination and/or harassment, including the contact information (name or title, address, email address and telephone number) for the College's Section 504 Coordinator;
- c. The right of the parties to provide evidence and witnesses;
- d. Reasonable timeframes for the completion of the major stages of the investigation;
- e. Written notice of the outcome of the investigation to both parties;
- f. If the College chooses to include an informal mechanism for resolving complaints, notice that the informal resolution process is voluntary, and that the complainant has the right to end the informal resolution process at any time and access the formal grievance process;
- g. If the College chooses to include OCR's Cleveland field office contact information, notice of the correct contact information for that office, which is:

U.S. Department of Education, Office for Civil Rights
350 Euclid Ave., Suite 325
Cleveland, Ohio 44115
Office main line: 216.522.4970
TTY/TDD: 800-877-8339
Fax: 216.522.2667

Reporting Requirement: By **December 21, 2021**, the College will provide OCR with documentation of its compliance with Action Step 3, including a copy of the updated procedures.

- 4. Within **30 calendar days** of OCR's approval of its updated disability discrimination grievance procedures, the College will adopt the procedures, publish them on its website in a location that is easy to find, and include them or a link to them in its catalogs and student and employee handbooks. The College will also send notice to its students and employees, via email or other means, of the new Section 504 grievance procedures and where they can be located.

Reporting Requirement: Within **30 calendar days** of receiving OCR's approval of its updated disability discrimination grievance procedures, the College will provide OCR with documentation of its compliance with Action Step 4, including links to the procedures on the College's website, and documentation that the updated procedures are included in the College's catalogs and student and employee handbooks, and a copy of the notice of the procedures it sent to students and employees and information regarding how the notice was provided, e.g., via email.

- 5. Within **60 calendar days** of OCR's approval of the College's updated disability discrimination grievance procedures, the College will provide training by a competent

authority on Section 504 to the staff of the College's Office of Disability Services, the College's Section 504 Coordinator, and the College's Vice President for Student Affairs and Dean of Students. Should any of these individuals be away from work due to legally protected leave, that individual shall complete the training within 30 calendar days of returning from leave, or, if they do not return from leave, the individual appointed to replace them shall complete the training within 30 days of beginning employment with the College. The training will address, at a minimum, the following topics:

- a. Section 504's prohibition against disability discrimination and harassment and the College's obligation to address disability discrimination and harassment pursuant to this law, including Section 504's requirement that the College establish and publicize disability discrimination grievance /procedures. The training will provide instruction on how to recognize disability harassment and how to respond appropriately to address such harassment, prevent its reoccurrence and remedy its effects.
- b. Section 504's requirement that the College have a designated Section 504 Coordinator, and the name, title and duties of the College's Section 504 Coordinator;
- c. The contents of the College's updated disability discrimination grievance procedures. The training will emphasize the importance of documenting any reports or complaints of disability discrimination and harassment, documenting the College's response to each incident, including maintaining documentation of any College investigation and findings, and notifying the reporting party and other parties in writing of any findings.

Reporting Requirement: Within **30 days** of completing the training in Action Step 5, the College will provide OCR with documentation showing that the College implemented Action Step 5. Specifically, the College will provide the dates of the training, how the training was provided, verification of the names and titles of administrators and staff who received the training, the name and qualifications of the presenter(s), outlines of the topics covered in the training, and any materials distributed during the training.

6. By **December 6, 2021**, the College will send a letter to the Student via certified mail. The letter will notify the Student of the College's updated Section 504 complaint policy and the Student's right to apply for readmission as a transfer student. The letter will also provide the Student with the name and contact information for the College's Section 504 Coordinator, who the Student can contact with any questions.

Reporting Requirements: By **December 13, 2021**, the College will provide OCR with documentation of its compliance with Action Step 6, including a copy of the letter to the Student and documentation that it was sent via certified mail and email.

General Requirements

The College 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 the Agreement. Further, the College understands that during the monitoring of this 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 terms and obligations of the Agreement, OCR will close the case.

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

The Agreement will become effective immediately upon the signature of the College's representative below.

/s/

12/02/2021

President or Designee

Date