

Waste Land Case Resolution Agreements

NATIONAL
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Introduction

Since January 2025, the Trump administration has engaged in a multi-pronged campaign to reform America's institutions of higher education (IHE) by terminating their discriminatory policies, toleration of lawless conduct, and financial dependence on foreign entities. More concretely, the Trump administration's reform agenda for higher education has focused on:

- University race and sex discrimination in student admissions, hiring of faculty and staff, and university programs and policies.
- University sex discrimination in the name of "transgenderism."
- University tolerance of anti-Semitism, and (especially after October 7, 2023) mass lawbreaking by university members designed to intimidate and/or remove from campus all Jews.
- University non-compliance with foreign gift transparency laws.
- University dependence on international student admissions.
- University political discrimination to silence non-progressive speech and to remove non-progressives from the student body, faculty, and staff.

The four main tools the administration has used are executive orders, (non-)disbursement of federal funds, the Compact for Academic Excellence in Higher Education, and—the subject of this report—case resolution agreements with individual universities. These four tactics aim for the same objectives and are intended to work together. Case resolutions, however, appear to be the means that the Trump administration hopes will provide actual reform of academia. Education reformers should pay close attention to what the Trump administration has been doing—and see how they can work to help maximize the effectiveness of the case resolution strategy.

Executive Orders, Federal Money, and the Compact

The Trump administration's Executive Orders provide the legal basis for the rest of its reform program. Of the 200+ Executive Orders promulgated by Fall 2025, about 50 concern higher education, including EO 14168 [Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government]; EO 14151 [Ending Radical and Wasteful Government DEI Programs and Preferencing]; and EO 14173 [Ending Illegal Discrimination and Restoring Merit-Based Opportunity].¹ These Executive Orders act as statements of principle and declarations of intent to be accomplished in detail by further administration actions.

The Trump administration first gave effect to these Executive Orders by using federal money as a lever in its confrontation with institutions of higher education (IHEs).² The federal government—the Education Department (ED), as well as the National Institutes of Health and other components of the federal government—ceased the disbursement of increasing numbers of funds, particularly for research grants, not least as a means of exerting financial pressure on the universities. While several federal judges have enjoined the

federal government's action,³ these financial actions had an immediate effect, and the ultimate resolution of the legal challenges to the government's actions remained uncertain. Certainly this financial lever has proven to be a useful tool in the Trump administration's campaign to reform higher education, although it may have a greater short-term effect than long-term.

More recently, in September and October 2025, the Trump administration has followed up on this financial pressure by offering first nine elite IHEs, and then every college and university, the opportunity to sign the Compact for Academic Excellence in Higher Education, in return for enhanced access to federal money.⁴ The substance of the Compact largely duplicates the items in the case resolution with Columbia University, which we will explore at greater length below. It is unclear whether the Trump administration has the legal authority to facilitate access to federal money on signing the Compact—but, in any case, none of the original nine universities as yet has accepted the Trump administration's offer. Most other IHEs seem unlikely to accept the Trump administration's broader offer. The Compact is a useful means to appeal to public opinion, but it does not seem likely to produce concrete administrative reforms at most IHEs.

The Case Resolution Strategy

The case resolution strategy, by contrast, already has produced victories for the Trump administration. Several universities, presumably responding in good measure to the combination of Executive Orders and financial non-disbursements, agreed to resolution agreements with the federal government during the summer and fall of 2025, including the University of Pennsylvania,⁵ Brown University,⁶ the University of Virginia (UVA),⁷ Cornell University,⁸ and Columbia University.⁹

Trump Administration Case Resolution Agreements, as of November 10, 2025

University of Pennsylvania	June 30, 2025	No fine
Columbia University	July 23, 2025	\$200 million fine
Brown University	July 30, 2025	\$50 million fine
University of Virginia	October 22, 2025	No fine
Cornell University	November 7, 2025	\$30 million fine

The University of Pennsylvania's agreement focused on ceasing its sex discrimination in the name of "transgenderism." Brown, UVA's, Cornell's, and Columbia's agreements provided more general resolutions of outstanding issues. These resolution agreements broadly followed this model:

- The federal government dropped its outstanding charges against the universities, while the universities paid hefty fines (formal or informal)—no fines in UVA's case, but \$50 million in the case of Brown, \$30 million for Cornell, and \$200 million in the case of Columbia.
- The federal government dropped its bolder initiatives, including the ambition to intervene directly in the self-government of the universities.
- The universities promised extensive self-reforms, sometimes with the oversight of external monitors mutually agreed to by the federal government and the universities.

The ED's decision to use a strategy of case resolution agreements—and the success of that strategy to date—suggest that this is how the ED will put the Trump administration's higher education reform strategy into effect.

The Trump administration has been effective in using case resolutions, not least because previous administrations also used them to great effect. The case resolution agreement has been an effective but extra-statutory means the ED used to impose policy on IHEs during the last generation. A resolution agreement, because it is technically voluntary, does not require authorizing a Congressional statute—or even a regulation submitted for public comment. Progressive bureaucrats have used legal challenges and resolution agreements to pressure IHEs to adopt progressive policies—and, as importantly, to pressure them to establish new progressive bureaucracies that would maintain pressure for progressive priorities, especially the identity politics agenda, from within the IHEs. A resolution agreement, moreover, provided a powerful signal to every other IHE about what they needed to do to avoid the ED’s legal attentions: one resolution agreement provided a means to change policies at a host of IHEs. NAS has written extensively about the power and the pernicious consequences of ED resolution agreements.¹⁰

The Trump administration ED apparently has decided that resolution agreements provide a useful tool, despite their dangers—and despite its simultaneous campaign to eliminate much of the real size and authority of the ED. A resolution agreement with Brown or Columbia offers the promise that a host of other IHEs will voluntarily reform their policies to match the requirements of the resolution agreement. On the other hand, it is of necessity a compromise that withdraws the Trump administration from some of the bolder proposed initiatives to reform IHEs.

This strategy implies several characteristics of the ED:

- *Education Department Weakness.* The ED has behaved boldly in its confrontation with the universities. But it does ultimately consist of a relatively small number of political appointees and a larger permanent staff yet to be fully transformed by firing and rehiring into a corps infused with a new reform commitment, while it possesses a relatively small budget. Furthermore, the ED probably would require the support of statutory reform to make good on some of its bolder aspirations for higher education reform. In any case, it must confront thousands of IHEs, who collectively possess vast staff and resources—and elite institutions that individually are quite wealthy. The ED probably is not prepared for a full-scale war of attrition against the entire higher education sector. The ED’s decision to pursue a case resolution agreement strategy likely registers an intelligent appreciation of the limits of its own strength.
- *Desire for Political Victory.* The ED surely has a desire to proclaim a victory. This is a natural feature of the political world. A case resolution agreement provides a natural headline, and something to use as bragging rights going forward. The ED probably would be willing to compromise on some long-term reform so as to claim a short-term victory. The ED’s motivations possess some justification, including in the campaign for long-term reform: energy for sustained reform frequently derives from loudly proclaimed early successes. Nevertheless, the desire for a favorable headline can come at the expense of enduring change.

As the American public evaluates the case resolution strategy, it should keep these factors in mind:

- *Importance of Fines.* The Brown University Resolution Agreement secured \$50 million from Brown University¹¹ and \$221 million from Columbia University.¹² These are not trivial amounts of money. Brown University has an endowment of \$6.7 billion and Columbia an endowment of \$14.8 billion,¹³

but university portfolios are relatively inflexible compared to those of actual investment funds. These fines are significant punishments and incentives not to engage in further misconduct. On the other hand, they are *survivable* fines—and there is no guarantee that the universities will be fined again. If the fines are one-and-done, university administrators may think it is reasonable to continue their old policies, albeit with more camouflage. The fines provide an incentive against further misconduct, but they are not large enough, by themselves, to ensure that outcome.

- *Reliance on Internal Reform.* The ED's bolder proposals suggested external administration of large portions of university governance—to put much of the university into receivership, formally or informally.¹⁴ The case resolution strategy relinquishes that tactic, uses case resolutions to provide stated goals that the university administrations are supposed to achieve, and relies on universities to cooperate by engaging in sufficient internally-administered reform to achieve the stated ends. In theory, it should be easy for universities to undertake these reforms, since they largely involve putting existing law into force. In practice, that is precisely why education reformers should doubt that universities actually will live up to their case resolution agreements: the universities should have been following these laws in the first place, and the ED's case resolution strategy relies on provenly unreliable intermediaries for its execution.
- *Case Resolution Strategy Has Depended on Acquiescent Bureaucracies:* Progressive administrators achieved such great success with the case resolution strategy in good measure because ED personnel were enforcing policy change on bureaucrats who generally welcomed the ED's initiatives. Case resolution agreements were a means for interlocking bureaucracies that largely wished to accomplish the same progressive goals to avoid accountability to the public for its actions. Federal administrators could pretend they had imposed nothing, local administrators could tell policy-makers and citizens that they had no choice but to make these reforms, but both could proceed with the goals they already intended. In this case, however, IHE bureaucracies strongly dislike the Trump administration reforms they have agreed to undertake. Americans must expect them to perform as little as possible, and to sabotage the case resolutions if they can get away with it. The ED's case resolution strategy will not be self-executing.
- *Monitoring Essential.* The July 2025 Columbia resolution provides for an independent monitor to ensure that the university administration complies with the resolution agreement.¹⁵ An independent monitor in theory can provide sufficient oversight to ensure that universities follow through on their commitments. Whether independent monitors will achieve success in practice is less certain. A monitor, even a monitor with a staff, will face a formidable challenge to exert proper oversight on a massive university bureaucracy.

The case resolution strategy, in other words, might produce large-scale change in IHEs, with relatively little investment of political capital and administrative time by the ED and a great deal of internally administered reform by college and university administrations. But university administrators might instead fail to deliver on promised reforms—and the ED might decide to take the fines and the headlines as a sufficient victory. A great deal turns on how well the universities fulfill the promised changes they have made in their case resolutions.

The Role of Education Reformers: Auxiliary Oversight to Ensure Compliance

The ED and officially appointed independent monitors will have limited resources to ensure university compliance. Independent education reformers can make up that shortfall by conducting investigations into how well IHEs have fulfilled their case resolutions and by organizing publicity and political pressure to ensure the IHEs comply with their commitments. Information gathered by independent education reformers also can give the ED the information they need to return to the IHEs and, with relatively little investment of time on ED's part, detail what precisely the colleges and universities need to do to fulfill their case resolution obligations. Education reformers acting as truly independent monitors can strengthen university compliance with case resolutions—and thereby make the ED's case resolution strategy effective.

Education reformers should focus first on Columbia University (and Harvard University, should Harvard enter into an equally thorough case resolution agreement with the ED), as its case resolution provides the framework for comprehensive reform of IHEs across America. Education reformers should publicly and repeatedly call on Columbia to provide public information confirming that it has made progress toward, and/or completed, satisfying its case resolution agreement. Columbia's case resolution agreement also will provide a convenient basis for education reformers to focus their work—at Columbia and elsewhere. The same list of items that Columbia has agreed to should, after all, be best practices for all IHEs. Education reformers can use the same list as a template to present to IHEs around the nation.

We suggest that education reformers use the following ten-point template, drawn from the resolution agreement with Columbia University, to focus efforts on ensuring that Columbia (and other IHEs) fulfill the case resolution agreement. This template includes headline points and concrete metrics for evaluating compliance.

CASE RESOLUTION COMPLIANCE

1. **Demonstrated nondiscrimination for race, sex, and national origin in student admissions.**¹⁶
Metric: Annual publication on a publicly accessible university webpage of de-identified admission statistics, showing both rejected and admitted students, dis-aggregated by race, color, grade point average, and performance on standardized tests, in a form permitting appropriate statistical analyses.
2. **Demonstrated nondiscrimination for race, sex, and national origin in hiring of faculty and staff.**¹⁷
Metric: Annual publication on a publicly accessible university webpage of de-identified statistics on faculty hiring, tenuring, and salary statistics, dis-aggregated by race and sex, correlated with professional attainment, for hired and tenured faculty, in a form permitting appropriate statistical analyses.
3. **Demonstrated removal of programs that promote unlawful efforts to achieve race-based outcomes, quotas, diversity targets, or similar efforts.**¹⁸
Metric: Annual publication on a publicly accessible university webpage of de-identified grants, awards, and other financial disbursements for students and faculty, dis-aggregated by race and sex, correlated with professional attainment, in a form permitting appropriate statistical analyses.
4. **Demonstrated removal of sex-discrimination policies regarding so-called "transgenderism."**¹⁹
Metric: No so-called "transgender" individuals present in single-sex university housing or sports that does not correspond with these individuals' biological sex.

- 5. Demonstrated removal of programs that promote unlawful efforts to achieve race-based outcomes, quotas, diversity targets, or similar efforts.²⁰**
Metric: Annual publication on a publicly accessible university webpage of de-identified grants, awards, and other financial disbursements for students and faculty, disaggregated by race and sex, correlated with professional attainment, in a form permitting appropriate statistical analyses.
- 6. Demonstrated removal of sex-discrimination policies regarding so-called “transgenderism.”²¹**
Metric: No so-called “transgender” individuals present in single-sex university housing or sports that does not correspond with these individuals’ biological sex.
- 7. Demonstrated effectiveness of student and faculty discipline.²²**
Metric: University functions normally (no “encampments”) without special security measures. Student, faculty, and staff lawbreaking punished by suspensions, expulsions, and termination of employment.
- 8. Demonstrated effectiveness of face mask prohibitions.²³**
Metric: No face masks on campus, save for religious or medical reasons.
- 9. Demonstrated removal of tolerance for anti-Semitism.²⁴**
Metric: The university hires new professors in academic units particularly marred by anti-Semitism to ensure intellectual diversity; the university appoints a responsible individual to ensure there is no antisemitic harassment or policy on campus.
- 10. Demonstrated reform of admissions of international students.²⁵**
Metric: Annual publication on a publicly accessible university webpage of procedures instituted to screen for commitment to American values, along with de-identified statistics on the numbers of applicants from each country who pass and fail these procedures.
- 11. Demonstrated decrease of financial dependence on international student enrollment.²⁶**
Metric: Annual publication on a publicly accessible university webpage of university total revenues and tuition revenues, and international student tuition revenues as a proportion of both figures. University financial dependence on international student tuition revenues should decline by 20% in both proportionate and absolute terms from 2020-2021 fiscal year.
- 12. Demonstrated compliance with all federal foreign gift and contract reporting obligations.²⁷**
Metric: Publication on a publicly accessible university webpage of a database registering all foreign gifts and contracts, updated at least weekly.

These reforms are by no means everything that must be done to reform our colleges and universities. Yet they would remove a great deal of the worst lawlessness and discrimination committed by IHEs. The Columbia case resolution agreement provides an excellent basis for a major and achievable program of education reform. The ED may not have the manpower to execute that case resolution agreement itself, either at Columbia or nationwide. But independent education reformers can use that framework to give substance to that case resolution agreement.

Conclusion

The Trump administration’s higher education reform campaign to terminate discrimination, lawlessness, and foreign dependence encompasses Executive Orders, non-disbursement of federal funds, the Compact for Academic Excellence in Higher Education, and case resolution agreements with individual universities. The ED’s case resolution strategy can make this broader campaign succeed—if education reformers take up the challenge to monitor how well our colleges and universities have followed through on their promises. Reformers should focus first on Columbia and on other universities that have entered into case resolution agreements with the ED. The same to-do list, however, can and should be applied to IHEs

around the country. The principles and the metrics that can be used to assess Columbia can be used everywhere. They articulate lucidly the laws of the land and what colleges and universities should do to assure the public that they are obeying the law. The ED's case resolution strategy's greatest promise lies in its duplicability. Education reformers acting independently can make good the ED's manpower limitations and provide the oversight and accountability that will make the case resolution strategy a success. Thereby they also will ensure the success of the Trump administration's entire higher education reform campaign.

- 1 Peter Wood, "Why Universities Should Welcome (and Sign) Trump's Compact," October 29, 2025, <https://www.mindingtheecampus.org/2025/10/29/why-universities-should-welcome-and-sign-trumps-compact/>; EO 14168, "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government," January 20, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>; EO 14151, "Ending Radical And Wasteful Government DEI Programs And Preferencing," January 20, 2025, <https://www.govinfo.gov/content/pkg/DCPD-202500118/pdf/DCPD-202500118.pdf>; EO 14173, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity," January 21, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/ending-illegal-discrimination-and-restoring-merit-based-opportunity/>.
- 2 Greta Bedekovics and Will Ragland, "Mapping Federal Funding Cuts to U.S. Colleges and Universities," *Center for American Progress*, July 23, 2025, <https://www.americanprogress.org/article/mapping-federal-funding-cuts-to-us-colleges-and-universities/>.
- 3 E.g., Karen Feldscher, "Federal grant cuts at Harvard illegal, judge rules; Harvard Chan faculty express relief, concern," *T. H. Chan School of Public Health, Harvard University*, September 9, 2025, <https://hsph.harvard.edu/news/federal-grant-cuts-at-harvard-illegal-judge-rules-harvard-chan-faculty-express-relief-concern/>.
- 4 Wood, "Why Universities Should Welcome (and Sign) Trump's Compact"; Katherine Knott, "Deciphering Trump's Compact Invitation to All of Higher Ed," *Inside Higher Ed*, October 15, 2025, <https://www.insidehighered.com/news/government/2025/10/15/trump-opens-compact-all-higher-ed-now-what>.
- 5 Resolution Agreement, University of Pennsylvania [hereafter UP Resolution Agreement], OCR Investigation Number 03256901, June 30, 2025, <https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-agreements/03256901-b.pdf>.
- 6 Resolution Agreement [hereafter Brown University Resolution Agreement], July 30, 2025, https://www.brown.edu/sites/default/files/brown-and-united-states-resolution-agreement_July-30-2025.pdf.
- 7 Agreement between the United States of America and the Rector and Visitors of the University of Virginia, October 22, 2025, <https://federalinfo.virginia.edu/sites/federalinfo/files/2025-10/US-University-of-Virginia-Standstill-Agreement-20251022.pdf>.
- 8 Agreement between the United States of America and Cornell University, November 7, 2025, <https://statements.cornell.edu/2025/documents/cornell-settlement-agreement.pdf>.
- 9 Resolution Agreement between the United States of America and Columbia University [hereafter Columbia University Resolution Agreement], July 23, 2025, https://president.columbia.edu/sites/president.columbia.edu/files/content/July%202025%20Announcement/Columbia%20University%20Resolution%20Agreement.pdf?utm_source=cio.
- 10 Neetu Arnold, Mason Goad, Teresa Manning, David Randall, and Nathaniel Urban, *Waste Land: The Education Department's Proficiency, Mediocrity, and Radicalism* (New York: National Association of Scholars, 2025), pp. 55-61, <https://www.nas.org/reports/waste-land>.
- 11 Brown University Resolution Agreement, p. 3 [§9]. Brown University will pay this sum "to state workforce development organizations operating in compliance with anti-discrimination laws, over the ten years following the Effective Date."
- 12 Columbia University Resolution Agreement, p. 5 [§10]. Columbia will pay \$200 million to the United States and \$21 million to a class settlement Claims Fund for employees who experienced civil rights violations of antisemitic discrimination or harassment at Columbia after October 7, 2023. "In Largest EEOC Public Settlement in Almost 20 Years, Columbia University Agrees to Pay \$21 Million to Resolve EEOC Antisemitism Charges," U. S. Equal Employment Opportunity Commission, July 25, 2025, <https://www.eeoc.gov/newsroom/largest-eeoc-public-settlement-almost-20-years-columbia-university-agrees-pay-21-million>.
- 13 "List of colleges and universities in the United States by endowment," Wikipedia, https://en.wikipedia.org/wiki/List_of_colleges_and_universities_in_the_United_States_by_endowment, accessed October 23, 2025.
- 14 E.g., Josh Gruenbaum, Sean R. Keveney, and Thomas E. Wheeler to Katrina Armstrong, David Greenwald, and Claire Shipman, March 13, 2025, <https://static01.nyt.com/newsgraphics/document-tools/6d3c124d8e20212d/85dec154-full.pdf>.
- 15 Columbia University Resolution Agreement, pp. 15-20 [§§40-53].
- 16 "Columbia shall maintain merit-based admissions policies. Columbia may not, by any means, unlawfully preference applicants based on race, color, or national origin in admissions throughout its programs. No proxy for racial admission will be implemented or maintained. Columbia may not use personal statements, diversity narratives, or any applicant reference to racial identity as a means to introduce or justify discrimination. ... Columbia shall provide the Resolution Monitor and the United States with admissions data consistent with 34 C.F.R. § 100.6 and similar regulations showing both rejected and admitted students broken down by race, color, grade point average, and performance on standardized tests, in a form permitting appropriate statistical analyses by October 1 of each year of the Agreement. Admissions data will also be subjected to a comprehensive audit by the Resolution Monitor. Non-individualized, statistical information regarding enrolled students shall be made available to the public each year for the Term of the Agreement, including the composition of the class broken down by race, color, national origin, grade point average, and performance on standardized tests." Columbia University Resolution Agreement, p. 8 [§§16, 18].
- 17 "Columbia shall provide that all hiring and promotion practices for faculty and administrative roles are grounded solely in individual qualifications and academic and professional merit, and shall not use of race, color, sex, or national origin as a factor-implicit or explicit-in hiring decisions across all schools, departments, and programs. The use of indirect methods or criteria that serve as a substitute for race conscious hiring or promotion practices is also prohibited. Nor may Columbia use personal statements, diversity narratives, or any applicant reference to racial identity as a means to introduce or justify discriminatory practices in hiring or promotion. All data related to faculty and administrative staff hiring and promotion practices shall be shared with the Resolution Monitor by July 15 every year for the term of the Agreement. Hiring data will also be subjected to a comprehensive audit by the Resolution Monitor." Columbia University Resolution Agreement, pp. 8-9 [§19].

- 18 "Columbia shall not maintain programs that promote unlawful efforts to achieve race-based outcomes, quotas, diversity targets, or similar efforts. For example, Columbia will not provide benefits or advantages to individuals on the basis of protected characteristics in any school, component, division, department, foundation, association or element within the entire Columbia University system. Columbia and each of its schools, components, divisions, and departments, including but not limited to professional and graduate schools, will comply with and follow antidiscrimination laws, including Title VI and Title IX of the Education Amendments of 1972. Columbia agrees to comply with all applicable laws, including Title VI, Title VII, and Title IX, and Section 1557 of the Affordable Care Act, regarding the treatment of individuals. Accordingly, Columbia will provide a timely report to the Resolution Monitor summarizing its compliance with this obligation, including an assurance that Columbia has acted responsibly to ensure its programs do not promote unlawful DEI goals." Columbia University Resolution Agreement, pp. 7-8 [§15].
- 19 "Columbia will uphold its commitment to Title IX of the Education Amendments of 1972 by providing safe and fair opportunities for women including single-sex housing for women who request such housing and all-female sports, locker rooms, and showering facilities." UP Resolution Agreement, p. 9 [§20]. For the proper interpretation of this point, see the provisions of the UP Resolution Agreement, of which align the University of Pennsylvania's policies with Executive Order 14168, Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government, January 20, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>; and Executive Order 14201, Keeping Men Out of Women's Sports, February 5, 2025, <https://www.whitehouse.gov/presidential-actions/2025/02/keeping-men-out-of-womens-sports/>.
- 20 "Columbia shall not maintain programs that promote unlawful efforts to achieve race-based outcomes, quotas, diversity targets, or similar efforts. For example, Columbia will not provide benefits or advantages to individuals on the basis of protected characteristics in any school, component, division, department, foundation, association or element within the entire Columbia University system. Columbia and each of its schools, components, divisions, and departments, including but not limited to professional and graduate schools, will comply with and follow antidiscrimination laws, including Title VI and Title IX of the Education Amendments of 1972. Columbia agrees to comply with all applicable laws, including Title VI, Title VII, and Title IX, and Section 1557 of the Affordable Care Act, regarding the treatment of individuals. Accordingly, Columbia will provide a timely report to the Resolution Monitor summarizing its compliance with this obligation, including an assurance that Columbia has acted responsibly to ensure its programs do not promote unlawful DEI goals." Columbia University Resolution Agreement, pp. 7-8 [§15].
- 21 "Columbia will uphold its commitment to Title IX of the Education Amendments of 1972 by providing safe and fair opportunities for women including single-sex housing for women who request such housing and all-female sports, locker rooms, and showering facilities." UP Resolution Agreement, p. 9 [§20]. For the proper interpretation of this point, see the provisions of the UP Resolution Agreement, of which align the University of Pennsylvania's policies with Executive Order 14168, Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government, January 20, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>; and Executive Order 14201, Keeping Men Out of Women's Sports, February 5, 2025, <https://www.whitehouse.gov/presidential-actions/2025/02/keeping-men-out-of-womens-sports/>.
- 22 "Columbia will comply with all legal requirements related to the Student and Exchange Visitor Program ("SEVIS" Program) and comply with all requests for immigration information consistent with the requirements of the program. Columbia will promptly provide the United States, upon request, with all disciplinary actions involving student visa-holders resulting in expulsions or suspensions, and arrest records that Columbia is aware of for criminal activity, including trespass or other violation of law, to the extent permitted by FERPA. Disciplinary actions will be determined without regard to immigration status. ... Columbia's UJB and rules process will be housed in and administered by the Office of the Provost. Each UJB panel will be comprised solely of faculty and administrative staff members. All panel members will undergo a rigorous vetting and conflict review process to ensure objectivity, impartiality, and a commitment to following and enforcing Columbia's rules and policies. The Provost will have final approval of all panel members and appellate Deans. Final determination of appeals of disciplinary decisions will remain with the University President. The University will not provide the UJB panel members with information about respondents' immigration status and the UJB will not consider respondents' immigration status in its deliberation or sanctioning. ... Demonstrations and other protest activities that occur inside academic buildings and places where academic activities take place present a direct impediment to maintaining Columbia's core academic mission. Such protests in academic buildings, and other places necessary for the conduct of University activities, are not acceptable under the Rules of University Conduct because of the likelihood of disrupting academic activities. ... All demonstration activity is subject to the University's anti-discrimination and anti-harassment policies. ... Student groups are subject to discipline for discriminatory conduct or other violations of University policy. Columbia's Office of Institutional Equity will enforce existing policy and processes for discipline of all student groups stemming from discriminatory conduct and retains the ability to sanction student groups for discriminatory conduct including by defunding, suspending, or de-recognizing them. The Office of University Life will enforce existing policy and processes for discipline of student groups unrelated to claims of discriminatory conduct, and retains the ability to defund, suspend, or de-recognize groups in the event of a violation. ... Columbia will impartially implement and apply University rules and policies, including prompt and consistent enforcement of disciplinary rules and policies without regard to identity or ideology. ... Columbia will evenly implement its institution-wide policies on harassment and discrimination under Title VI. ... Columbia shall ensure that its trainings for employees covers Columbia's relevant obligations under this Agreement. ... Columbia will maintain for the duration of the Agreement at least 36 trained and certified special officers, directly and through service providers, with the ability to remove individuals from campus and/or arrest them when appropriate. Columbia's existing 2015 Memorandum of Understanding with the New York Police Department ("NYPD") or similar successor Agreement will remain in full force and effect, ensuring that the NYPD can provide additional security assistance when needed." Columbia University Resolution Agreement, pp. 9-13 [§§23, 26-31].
- 23 "All individuals who engage in protests or demonstrations, including those who wear face masks or face coverings must, when asked, present their University identification to the satisfaction of a University delegate or Public Safety Officer. Individuals who fail to comply with these policies will be subject to discipline, being escorted off campus, and detention for trespass where appropriate. ... Face masks or face coverings are not allowed for the purpose of concealing one's identity in the commission of violations of University policies or state, municipal, or federal laws. Face masks or face coverings are always allowed for religious or medical reasons." Columbia University Resolution Agreement, p. 11-12 [§27(c-d)].
- 24 "The Senior Vice Provost, acting with the authority of the Office of the Provost, will conduct a thorough review of the portfolio of programs in regional areas across the University, starting with the Middle East. This review includes the Center for Palestine Studies; the Institute for Israel and Jewish Studies; Middle Eastern, South Asian, and African Studies; the Middle East Institute; the Tel Aviv and Amman global hubs; the School of International and Public Affairs Middle East Policy major; and other University programs focused on the Middle East. In this role, the Senior Vice Provost will: Review the educational programs to ensure the educational offerings are comprehensive and balanced; Review all aspects of leadership and curriculum; Steward the creation of new programs to address the full range of fields; Partner with the Vice Provost for Faculty Affairs and the schools to create a standard review process for the hiring of non-tenured faculty across the University ... Columbia shall, consistent with its announcement on March 21, 2025, appoint new faculty members with joint positions in both the

Institute for Israel and Jewish Studies and the departments or fields of economics, political science, or SIPA. ... To further support Jewish life and the wellbeing of Jewish students on campus, Columbia will add an additional administrator ("Student Liaison"), reporting to the head of University Life, who will serve as a liaison to students concerning antisemitism issues, advise the University's agreement Administrator and other University leaders and make recommendations to University leaders about ways to improve and to support Jewish students." Columbia University Resolution Agreement, pp. 6-7 [§§12-14].

- 25 "Columbia will undertake a comprehensive review of its international admissions processes and policies and will ensure that international student-applicants are asked questions designed to elicit their reasons for wishing to study in the United States. ... Processes will be established to provide that all students, international and domestic, are committed to the longstanding traditions of American universities, including civil discourse, free inquiry, open debate, and the fundamental values of equality and respect. Students will also agree not to engage in discrimination, harassment, and other violations of Columbia policy. Columbia will also develop training materials to socialize all students to campus norms and values more broadly. ... The reforms should be made durable by adoption of any necessary organizational and personnel changes." Columbia University Resolution Agreement, p. 9 [§§21-22].
- 26 "Columbia will examine its business model and take steps to decrease financial dependence on international student enrollment. The reforms should be made durable by adoption of any necessary organizational and personnel changes." Columbia University Resolution Agreement, p. 9 [§22].
- 27 "Columbia will comply with all foreign gift and contract reporting obligations, including under Section 117 of the Higher Education Act. Columbia will comply with reasonable and lawful requests from the United States for information related to foreign funding sources." Columbia University Resolution Agreement, p. 10 [§24].