

**RESOLUTION AGREEMENT
YAKIMA SCHOOL DISTRICT
OCR Docket: 10115001**

To resolve the above-referenced compliance review conducted by the U.S. Department of Education, Office for Civil Rights (OCR), the Yakima School District (District) agrees to the terms of this Agreement. OCR conducted the compliance review under the authority of Title IX of the Education Amendments of 1972, 20 U.S.C. §1681 et seq. (Title IX), and its implementing regulation at 34 C.F.R. Part 106; Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d et seq. (Title VI), and its implementing regulation at 34 C.F.R. Part 100; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §794, as amended (Section 504), and its implementing regulation at 34 C.F.R. Part 104; and Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. §12131 et seq. (Title II), and its implementing regulation at 28 C.F.R. Part 35.

DEFINITIONS

- Sexual harassment means unwelcome conduct of a sex nature, which can include sex assault, sex violence, sex misconduct, unwelcome sexual advances, requests for sex favors, or other verbal, nonverbal, or physical conduct of a sexual nature. It can include conduct such as touching of a sexual nature; making sexual comments, jokes or gestures; writing graffiti or displaying or distributing sexually explicit drawings, pictures or written materials; calling students sexually charged names; spreading sexual rumors; rating students on sexual activity; or circulating, showing, or creating electronic mail messages (e-mails) or websites of a sexual nature. Sexual harassment includes gender-based harassment,¹ which includes acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping, but which are not necessarily sexual in nature. Gender-based harassment includes harassment of an individual either for exhibiting what is perceived as a stereotypical characteristic for their sex, or for failing to conform to stereotypical notions of masculinity and femininity.
- Racial harassment means conduct (e.g., physical, verbal, graphic, or written) that is sufficiently severe, pervasive or persistent so as to interfere with or limit the ability of an individual to participate in or benefit from the services, activities or privileges provided by a recipient. Racial harassment includes harassment on the basis of actual or perceived shared ancestry or ethnic characteristics.
- Disability harassment is intimidation or abusive behavior toward a student based on disability that creates a hostile environment by interfering with or denying a student's participation in or receipt of benefits, services, or opportunities in the District's program. Harassing conduct may take many forms, including verbal acts and name-calling; as well as nonverbal behavior, such as graphic and written statements, or conduct that is physically threatening, harmful, or humiliating. Disability harassment may adversely affect an elementary or secondary school student's education and constitute a denial of a free appropriate public education (FAPE) under Section 504 and Title II.

¹ Hereinafter, all references to sexual harassment include gender-based harassment.

ACTION ITEM I: RESPONSES TO COMPLAINTS

The District agrees to take all reasonable steps to ensure that students enrolled in the District are not subject to harassment on the bases of sex, race, color, national origin², or disability. To this end, the District will promptly respond to all complaints (both formal³ and informal⁴) of harassment of students on the bases of sex, race, and disability, and all incidents which are known or reasonably should be known to the District. The District will take prompt and effective responsive action reasonably designed to end the harassment; prevent its recurrence; and where appropriate, take steps to remedy the effects of the harassment on the complainant and the larger school community.

REPORTING REQUIREMENT: By July 31, 2015, 2016, and 2017, the District will provide documentation to OCR of all informal and formal complaints of harassment on the bases of sex, race and disability made during the preceding school year. This documentation will include copies of each complaint; a description of the complaint; the District's response; and the resolution, including the report of any investigation conducted. If there have been no complaints, the District will so certify that no complaints on the bases of sex, race or disability were made.

ACTION ITEM II: ANTI-HARASSMENT STATEMENT

By February 28, 2015, the Superintendent and School Board will issue a statement to all District students, parents and staff that will be printed in each school's and/or District's newsletter, and published on the District's website, stating that the District does not tolerate acts of harassment on the bases of sex, race, or disability. The statement will encourage any student who believes he or she has been subjected to harassment on the bases of sex, race, or disability to report the harassment to the District and note the District's commitment to conducting a prompt investigation. The statement will include the appropriate contact information for the designated staff member to whom students and parents may report allegations of harassment. The statement will indicate that support, including counseling and educational resources will be available to students who are harassed as well as to students found to have engaged in acts of harassment on the bases of sex, race, or disability. The District will also warn that harassers may be disciplined; including if circumstances warrant, with suspension or expulsion. The statement will encourage students, parents and District staff to work together to prevent harassment on the bases of sex, race, and disability; and reinforce that the district will not tolerate retaliation for reporting harassment and will take steps to protect those who wish to report harassment anonymously or confidentially. The District will distribute this statement in languages other than English, as necessary.

² Hereinafter, references only to racial harassment include harassment based on color or national origin.

³ Formal complaints are defined as those that are presented in written form.

⁴ Informal complaints include those that are reported verbally to a responsible employee; i.e., an employee who has the authority to take action to redress the harassment; who has been given the duty of reporting incidents of harassment or any other misconduct by students to the Title IX coordinator or other appropriate school designee; or whom a student could reasonably believe has this authority or duty.

REPORTING REQUIREMENT: By January 16, 2015, the District will submit a copy of the District's statement for OCR's review and approval. OCR will respond within 15 calendar days. Within 30 calendar days of receiving OCR's approval, the District will issue the statement and provide OCR with copies of all newsletters and webpages where the statement was published, as well as copies of the statement in languages other than English.

ACTION ITEM III: EQUITY CONSULTANT

By February 28, 2015, the District will retain the services of a consultant ("Equity Consultant"). The Equity Consultant will be mutually agreed upon by the District and OCR; must have expertise in the area of prevention of harassment based on sex, race, and disability; and may be an individual(s) from the Region X Equity Assistance Center, another qualified third-party consultant(s), or an employee(s) of the District with the requisite expertise. The Equity Consultant will review the effectiveness of the District's current policies, practices and procedures; the letter of findings that OCR issues explaining the results of its compliance review; written guidance published by OCR regarding harassment on the bases of sex, race, and disability; and other resources the Equity Consultant deems useful, such as current research and best practices in other school districts. Utilizing this information, the Equity Consultant will collaborate with the District to do the following, at a minimum:

- Designate compliance coordinators and made recommendations regarding the extent to which additional compliance coordinators are needed, as required by Action Item IV, below;
- Review and revise its Notice of Non-Discrimination, as required by Action Item V, below;
- Evaluate and recommend revisions to the District's harassment policies and grievance procedures, as required by Action Item VI below;
- Form an Anti-Harassment/Bullying Task Force as required by Action Item VIII, below;
- Develop and provide training, as required by Sections IX and X below;
- Develop a system for documenting, investigating, record-keeping, and tracking complaints of harassment on the bases of sex, race, and disability, as required by Section XI below; and,
- Develop a monitoring program to assess the effectiveness of the District's efforts to prevent and address harassment on the bases of sex, race, and disability, as required by Action Item XII below.

REPORTING REQUIREMENT: By January 16, 2015, the District will provide to OCR for review and approval the name and qualifications of its selected Equity Consultant. The District will provide OCR with information reflecting that the proposed consultant has sufficient expertise in the area of prevention of harassment based on sex, race, and disability; and training to be able to assist the District with fulfilling its obligations under this agreement. OCR will respond within 15 calendar days. Within 30

calendar days of receiving OCR's approval of the proposed Equity Consultant, the District will provide documentation to OCR to substantiate that it has retained the Equity Consultant required under this section.

ACTION ITEM IV: COMPLIANCE COORDINATORS

By February 12, 2015, the District will designate one or more individuals to coordinate its efforts to comply with and carry out its responsibilities under the regulations enforced by OCR; including the prompt and equitable resolution of complaints of discrimination and harassment filed by students, staff and faculty. The District will revise all relevant policies, procedures and publications to include the name/title, office address, telephone number and electronic mail (email) address of the person(s) designated to coordinate its efforts to comply with the regulations enforced by OCR. The District will ensure that contact information for the coordinator(s) is consistent and complete in all such materials.

REPORTING REQUIREMENT: By February 12, 2015, the District will inform OCR of the identity and qualifications of the individual(s) designated to coordinate its efforts to comply with and carry out its responsibilities under the regulations enforced by OCR; and the specific responsibilities of the coordinator(s), including the issue areas and geographical areas for which the coordinator(s) will be responsible. Additionally, the District will provide documentation to OCR demonstrating that the information listed above about the coordinator(s) has been provided consistent with the Action Item above; such as a copy of revised materials and publications containing this information, and/or a link to the on-line version of the materials and publications. Inserts may be used pending reprinting of the materials and publications.

ACTION ITEM V: NOTICE OF NON-DISCRIMINATION

By March 19, 2015, the District will review and revise its Notice of Non-Discrimination to state that the District does not discriminate on the basis of sex, race, color, national origin, or disability (the notice may include other bases); and, that this requirement not to discriminate extends to all of its programs and activities, including employment and admission as applicable. Additionally, the notice will reinforce that the District will not tolerate retaliation for reporting harassment, and will take steps to protect those who wish to report harassment anonymously or confidentially. Further, the notice will state that inquiries concerning the application of regulations prohibiting discrimination may be referred to the person(s) designated to coordinate the District's efforts to comply with all aspects of regulations prohibiting discrimination, or to OCR. The District will ensure that the notice of nondiscrimination is disseminated in languages other than English, as necessary; and is included in each announcement, bulletin, catalog, or application form which it makes available to students, parents, employees, applicants for employment, and all unions or professional organizations holding collective bargaining or professional agreements with the district. The notice will also be posted prominently on District and school websites and at various locations throughout the schools, as well as in electronic and printed publications of general distribution that provide information to students and employees about the schools' services and policies.

REPORTING REQUIREMENT: By, February 5, 2015, the District will provide the revised Notice of Non-Discrimination to OCR for review and approval. OCR will respond within 15 calendar days. Within 30 calendar days of OCR's approval, the District will provide documentation to OCR (such as a copy of revised materials and publications containing the notice of nondiscrimination, and/or a link to the on-line version of the materials and publications) demonstrating that the approved notice has been disseminated in accordance with the Action Item above. Inserts may be used pending reprinting of the materials and publications.

ACTION ITEM VI: HARASSMENT POLICIES AND GRIEVANCE PROCEDURES

By May 31, 2015, in collaboration with the consultant, the District will revise its harassment policies and related grievance procedures to ensure that these adequately address and provide for the prompt and equitable resolution of complaints of harassment on the bases of sex, race, and disability. These procedures will include, at a minimum, the following:

- A statement setting forth the District's commitment to having a school environment free from all harassment on the bases of sex, race and disability. The statement will explain that the District prohibits harassment in the school environment, including all academic, extra-curricular and school sponsored activities. The statement will emphasize that staff (including teachers) must promptly report all incidents of harassment of which they become aware. Additionally, the statement will encourage students to immediately report incidents of harassment; and reinforce that the District will not tolerate retaliation for reporting harassment, and will take steps to protect those who wish to report harassment anonymously or confidentially. The statement will specify that the District will investigate formal and informal complaints of harassment.
- Definitions of what constitutes harassment on the bases of sex, race, and disability, including specific examples of prohibited conduct.
- Disciplinary sanctions that may be imposed upon the harasser.
- A statement that the prohibition regarding harassment on the bases of sex, race, and disability applies to conduct by employees, students, and third parties.
- A statement that because students often experience the continuing effects of off-campus harassment in the educational setting, the District will consider the effects of the off-campus conduct when evaluating whether there is a hostile environment on campus.
- A requirement that staff (including teachers) who become aware of possible harassment based on sex, race, or disability must report the incident to the principal or assistant principal at the relevant school site, or the designated coordinators responsible for the categories of prohibited discrimination described in this Agreement, who will document the report consistent with the procedure for memorializing informal complaints developed pursuant to Action Item XI below; and an explanation that such reports shall be treated as complaints under the District's procedures.

- Instructions on how to initiate a complaint under the District's procedures.
- The name/title, office address, telephone number and email address of the individual(s) with whom to file a complaint.
- The various steps the District will take to conduct an adequate, reliable, and impartial investigation of all complaints; and the interim measures that the District may take to ensure the safety of the complainant and the larger school community during the investigation.
- Designated and reasonably prompt timeframes for major stages of the grievance process.
- An opportunity for parties to present witnesses and other evidence.
- Clarification that confidentiality only may be maintained to the extent it does not compromise the integrity of the equitable and impartial investigation.
- Clarification of when complaints will be handled at the school site level and when these will be handled at the District level; and clarification of the roles of school staff, including School Resource Officers, District staff, and law enforcement in the investigation.
- An statement that the District will ensure that complainants are aware of their rights and available resources.
- An assurance that the District will offer counseling and academic support services to any person found to have been subjected to harassment; and, where appropriate, to person(s) who committed the harassment.
- Written notice to the parties of the outcome.
- Notice of the opportunity for parties to appeal the findings; and, an assurance that the appeal will be conducted in an impartial manner by an impartial decision-maker.
- An assurance and the action steps the District will take to prevent recurrence of harassment and to correct its discriminatory effects, if appropriate.
- A statement that Title IX, Title VI, Section 504, and Title II prohibit retaliation against any individual who files a complaint under those laws or participates in a complaint investigation; and, that the District will investigate all allegations of retaliation and take action against those found to have retaliated.
- Clarification that in the event of a sexual assault, the principal of the school site will immediately inform (a) the Title IX Coordinator, so that the District may ensure that it provides an appropriate response to the incident, consistent with the grievance procedures, and (b) law enforcement. The grievance procedures will also set forth a process to ensure that the victim is safe (this may include, for example, creating a safety plan and designating

an individual at the site level to act as her or his support person during and after the investigation).

REPORTING REQUIREMENT: By February 28, 2015, the District will provide a draft of the harassment policy and grievance procedures to OCR for review and approval. OCR will respond within 30 calendar days. Within 30 calendar days of OCR's approval, the District provide documentation to OCR demonstrating that it has formally adopted the revised harassment policy and grievance procedures; updated its printed publications and on-line publications with the revised policy and procedures (inserts may be used pending reprinting of these publications); and electronically disseminated the revised policy and procedures to students, parents and District staff. This documentation will include at a minimum; (i) printouts or a link to all on-line publications containing the revised policy and procedures; (ii) evidence of the electronic dissemination of the revised policy and procedures to students, parents and staff; and, (iii) if not yet finalized, copies of inserts for printed publications.

ACTION ITEM VII: CLIMATE CHECKS

By February 28, 2015, in collaboration with the consultant, the District will develop a climate check survey process to be conducted annually to assess students' attitudes and knowledge regarding various types of harassment, including harassment on the bases of sex, race, and disability; gather information concerning students' experiences with harassment on the bases of sex, race, and disability; determine whether students know when and how to report complaints of harassment on the bases of sex, race, and disability; and the effectiveness of steps taken pursuant to this Agreement or otherwise by the District to ensure that its schools are free of harassment on the bases of sex, race, and disability. The climate check survey process will be conducted through:

- Interviews of students from each grade, between fifth and twelfth, and of parents and community groups from representative District elementary, middle and high schools. The consultant and a District administrator(s) knowledgeable of Title IX, Title VI, Section 504 and Title II will conduct the interviews. An interview plan and list of questions must be provided to OCR for review and approval prior to the interviews; and
- Administration of a climate survey, which may be accomplished through a written or electronic survey, provided that students receiving the survey also are notified of a contact person, such as a counselor, should they wish to discuss this issue in person. The District may utilize an existing climate survey for this purpose, provided it is customized to measure the specific information required by this item. The survey must be provided to OCR for review and approval prior to its use.

The District will analyze the results of the climate check survey process within sixty (60) calendar days of the date it is conducted each year. The analysis will include recommendations to address concerns or issues identified through the check.

REPORTING REQUIREMENTS:

1. By February 28, 2015, the District will provide the survey, interview plan and draft interview questions to OCR for review and approval. OCR will respond within 30 calendar days.
2. By June 30, 2015, and annually thereafter, the District will conduct a climate check survey. Within 60 days of completing its analysis of the climate check survey in June of 2015, 2016, and 2017, the District will provide for OCR's review and approval the results, any recommendations, and any responsive actions that it plans to take. Upon OCR's request, the District will provide OCR with the raw results of the survey, notes from the student interviews, and any related documentation. OCR will respond within 30 calendar days.

ACTION ITEM VIII: TASK FORCE

By March 31, 2015, in consultation with the Equity Consultant, the District will develop a task force that will include parents, community members, representatives from community-based organizations, and students to make recommendations for improving school climate, implementing intervention and prevention strategies for preventing harassment, and ensuring that students and parents understand the right to be protected from harassment and retaliation and how to report incidents of harassment and retaliation. The task force may work in conjunction with safe schools initiatives or other anti-bullying and harassment programs currently in place or being implemented by the District, if appropriate. The task force will meet at least twice per school year and maintain documentation of the date and duration of each meeting, the topics addressed, as well as meeting minutes. At least once per school year, and more often if the task force recommends it, the superintendent or his/her designee will prepare a written report summarizing the task force's recommendations and suggestions.

REPORTING REQUIREMENTS:

- a) By March 31, 2015, the District will provide to OCR written confirmation that the task force has been created; with names of task force members and the date of the first meeting.
- b) By June 30, 2015, 2016, and 2017, the District will provide a report to OCR, for review and approval, summarizing the task force's recommendations and the District's responses to the recommendations; including whether and how these were implemented. OCR will respond within 30 calendar days.

ACTION ITEM IX: TRAINING FOR THE COMPLIANCE COORDINATOR(S) AND STAFF

By April 30, 2015, in collaboration with the Equity Consultant, the District will provide training to its designated coordinator(s) that covers recognizing and appropriately responding to

complaints and incidents of discrimination and harassment. The training will address how to conduct and document adequate, prompt, reliable, and impartial investigations; including conducting interviews of victims of harassment in a fair, non-biased, and objective manner. The training will also focus on the responsibility of the coordinator(s) to regularly develop and participate in activities designed to raise awareness within the District regarding harassment and the District's harassment policy and grievance procedures.

By April 30, 2015, in collaboration with the consultant, the District will provide training to all District staff and School Resource Officers regarding intervention and prevention strategies and responses to possible incidents of harassment on the bases of sex, race, and disability. This training will be provided separately to members of staff who work with particular grade levels - elementary, middle school, and high school - and will specifically target staff responsibilities by employment designation (e.g. site supervisors, school counselors, and teachers). In all cases, the training will include, at a minimum:

- in-depth instruction on what types of conduct constitute harassment on the bases of sex, race, and disability, the root causes of such harassment, and the negative impact that such harassment has on the educational environment;
- available support services for students being harassed;
- the availability of anti-bullying programs;
- a focused review of the District's harassment policy and related grievance procedures; including the District's responsibility for responding to such harassment and how to respond to such harassment; and
- notice that failure to respond appropriately to notices of harassment on the bases of sex, race, or disability violates District policy and may result in the imposition of disciplinary sanctions.

REPORTING REQUIREMENT: By April 30, 2015, the District will provide documentation demonstrating that the training referenced in Action Item IX above was provided. This documentation will include, at a minimum, the date(s) of the training; the name and credentials of the trainer; copies of any training materials used, including handouts, guides or other materials; and proof of attendance by relevant staff.

ACTION ITEM X: TRAINING FOR STUDENTS

By June 30, 2015, in collaboration with the Equity Consultant, the District will develop and provide annual age-appropriate student training districtwide regarding bullying and harassment, including cyberbullying. The training will be designed to increase awareness of what constitutes harassment based on sex, race, and disability; the District's prohibition against such harassment; how to recognize it; the importance of reporting it; how to report it; including methods for reporting incidents anonymously; the prohibition against retaliation for reporting incidents; how to report incidents of retaliation; and the consequences for subjecting individuals to harassment

or retaliation. In creating the training, the District will take into consideration the recommendations of the task force referenced in Action Item VIII above. The training will also cover the District's harassment policy and related grievance procedures; provide the name of the person(s) students may contact, and remind students of the availability of counseling services.

REPORTING REQUIREMENT: By June 30, 2015, the District will provide documentation to OCR demonstrating that the training referenced in Action Item X above was provided to all students. The documentation will include at a minimum: the date(s) of the training; the names and credentials of the presenters; copies of any materials used, including any handouts, guides or other materials; and a statement verifying attendance by students.

ACTION ITEM XI: DOCUMENTING COMPLAINTS AND INCIDENTS CONDUCTING INVESTIGATIONS, RECORD-KEEPING AND TRACKING

By March 31, 2015, in collaboration with the consultant, the District will develop and implement a system for documenting, investigating, record-keeping and tracking complaints and incidents of harassment on the bases of sex, race and disability (including reporting of incidents that do not result in the filing of a complaint). At a minimum, this system will include the following:

- A method for documenting all complaints of harassment.
- A method for documenting incidents of harassment of which responsible employees become aware but did not result in a complaint.
- A confidential procedure for instances in which the complaining party does not wish to identify her or himself to the alleged harasser.
- Assignment of school site administrators or staff with appropriate knowledge and experience of the procedures for conducting investigations.
- A requirement that the person designated to conduct the investigation will interview all relevant witnesses; including the alleged harasser, the student allegedly harassed, and others with knowledge of the incident.
- A method for documenting interviews and other information from all sources (including the parties involved; witnesses, teachers, counselors, and administrators) in one record-keeping system.
- A requirement that the person designated to conduct the investigation will determine, based on a preponderance of the evidence, whether the alleged harassment did or did not occur; the identity of the student who engaged in the conduct; and the harm to the student subjected to the harassment, if any.

- A method for the person designated to conduct the investigation to document the investigative findings, and the specific steps he or she took in conducting the investigation and reaching conclusions.
- A requirement that the person designated to conduct the investigation will maintain on-going contact with the individual allegedly harassed throughout the investigation and within a reasonable period of time following conclusion of the investigation, to assess whether there has been ongoing harassment or retaliation, and to determine whether additional supportive measures are needed.
- A process for the person designated to conduct the investigation to refer the matter to law enforcement authorities, where appropriate.
- A requirement that the person designated to conduct the investigation will follow the District's investigative procedures regardless of whether the alleged harassment is also being investigated by another agency, unless the fact finding process would impede a law enforcement investigation. In such cases, the District will implement appropriate interim steps to provide for the safety of the victim and the school community and the avoidance of retaliation; and, the District will promptly resume its investigation as soon as notified by the law enforcement agency that it has completed the evidence gathering portion of its proceeding.
- A requirement that the person designated to conduct the investigation will inform relevant members of the school community if the circumstances of an incident of harassment on the bases of sex, race, or disability suggests a threat to others. This may include, for example, notifying parents and employees if a student is sexually assaulted on the way home from school, or notifying employees of areas where harassment occurs.
- A requirement that the person designated to conduct the investigation will maintain records of all complaints, investigations, interim measures, interview notes, findings (including records of any corrective action taken, including disciplinary action) and the basis for those findings.
- A requirement that should the person designated to document, investigate, keep records and track complaints and incidents of harassment delegate other person to engage or assist in these activities, the person to whom the activities are delegated will have the necessary skills, abilities, and training to conduct those activities and will regularly report on those activities to the person with the primary responsibility for these activities.

REPORTING REQUIREMENT: By March 31, 2015, the District will provide to OCR for review and approval a description of the system for documenting, investigating, record-keeping, and tracking complaints and incidents of harassment on the bases of sex, race and disability developed in accordance with Action Item XI. OCR will respond within 30 calendar days. Within 30 calendar days of receiving OCR's approval, the District will provide confirmation that the system is operative.

ACTION ITEM XII: MONITORING AND SELF-ASSESSMENT OF PROGRAM EFFECTIVENESS

By April 30, 2015, in collaboration with the consultant, the District will develop and implement a monitoring system to assess the effectiveness of its efforts to prevent and address harassment based on sex, race, and disability and to promote a non-discriminatory school climate. The assessment will include, at a minimum:

- A review of student climate surveys and interviews to determine where and when harassment on the bases of sex, race, and disability occurs; deficits in students' knowledge of what constitutes harassment on the bases of sex, race, and disability and where to report it; and recommendations for how the District can better encourage reporting of and improve its response to complaints;
- A review of all reports of harassment based on sex, race, and disability and the District's responses to such reports;
- A review of the Task Force Report(s);
- Evaluation and analysis of the data collected concerning reported incidents of harassment on the bases of sex, race, and disability; and,
- Evaluation of all measures designed to prevent or address harassment on the bases of sex, race, and disability.

REPORTING REQUIREMENTS:

- a) By April 30, 2015, the District will provide to OCR a description of the monitoring system for OCR's review and approval. OCR will respond within 30 calendar days.
- b) By July 31, 2015, 2016, and 2017, the District will provide a copy of its assessment to OCR.

The District understands that OCR will not close the monitoring of this Agreement until OCR determines that the District has fulfilled the terms of this Agreement and is in compliance with the regulations implementing Title IX, at 34 C.F.R. §§ 106.8, 106.9, and 106.31; Title VI, at 34 C.F.R. § 100.3; Section 504, at 34 C.F.R. §§ 104.4, 104.7, and, 104.8; and Title II, at 28 C.F.R. §§ 35.106, 35.107, and, 35.130, which were at issue in this review. The District understands that by signing this Agreement, it agrees to provide data and other information in a timely manner. Further, the District understands that during the monitoring of this agreement, OCR may visit the District, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the District has complied with the terms of this Agreement and is in compliance with the regulations implementing Title IX, at 34 C.F.R. §§ 106.8, 106.9, and 106.31; Title VI, at 34 C.F.R. § 100.3; Section 504, at 34 C.F.R. §§ 104.4, 104.7, and, 104.8; and Title II, at 28 C.F.R. §§ 35.106, 35.107, and, 35.130, which were at issue in this compliance review. The District understands and acknowledges that OCR may initiate administrative

