

RESOLUTION AGREEMENT
Cleveland Metropolitan School District
OCR Docket # 15-11-5003

The Cleveland Metropolitan School District (the District) voluntarily submits this Resolution Agreement to the U.S. Department of Education, Office for Civil Rights (OCR), to resolve a Title VI compliance review initiated by OCR, OCR Docket No. 15-11-5003, that focused on ensuring equal access of Hispanic students to the District's science, technology, engineering, and mathematics (STEM) programs at the high school level, in compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*, and its implementing regulation at 34 C.F.R. Part 100 (Title VI). Before the conclusion of OCR's investigation, the District expressed an interest in resolving the compliance review; accordingly, the District agrees to take the action steps set forth below:

ACTION STEPS

For purposes of this Agreement, the District's STEM programs offered at the high school level include: MC2STEM, Cleveland School of Science and Medicine at John Hay, Design Lab Early College at Jane Addams, Garrett Morgan School of Science, East Technical Academy Engineering and Science (East Tech), New Tech East, and New Tech West.

STEM Strategic Planning Committee

1. By October 31, 2013, the District will form a STEM Strategic Planning committee comprised of students who participate in the District's high school STEM programs; parents of District elementary, middle and high school students; community leaders; representatives from the regional STEM Hub, District committees involved in outreach to parents and the community, and the District's multilingual office; District STEM educators and administrators from k-8 STEM schools (including the George Washington Carver, Hannah Gibbons-Nottingham, Michael R. White, Mary B. Martin, Mound, and Orchard schools), and the high school STEM programs; and any other interested parties, including, if determined to be necessary by the District, any expert consultant(s) hired by the District. The committee will appoint a chairperson and co-chairperson, only one of whom will be a District representative.

2. By January 25, 2014, the committee will conduct a comprehensive assessment of District STEM programs relating to access to and enrollment of Hispanic students in the District's high school STEM Programs. By March 21, 2014, the committee will develop a written report and recommendations to the District's superintendent and Board. The committee will consider and address in its report and recommendations the items listed below as well as ways to measure and evaluate the impact of the action(s) the District taken by the District, including measuring and evaluating will implement the effectiveness of strategies and policy changes implemented by this agreement.
 - a review of the District's enrollment data for K-8 and high school STEM programs, including but not limited to trend data and feeder patterns from K-8 schools to STEM programs, beginning with the 2008-2009 school year;

- identification and assessment of potential barriers to students enrolling in STEM programs, in particular any barriers unique to Hispanic students, including, at a minimum, number and subject matter of STEM programs, geographic location of STEM programs, participation in K-8 project-based learning and/or gifted and talented programs and/or other programs that may increase the likelihood of student participation in high school STEM programs, District communication and outreach about STEM programs to students and parents, peer pressure, teacher training and incentives to teach STEM courses, early awareness on the part of parents/guardians/students of the available STEM programs in the District and the relationship between the elementary school/middle school curriculum and the high school STEM programs, registration and enrollment requirements in the STEM programs, transportation (including effect of time restrictions for using transit cards on a student's ability to participate in extracurricular activities), and availability of English language services and support services for students enrolled in, or preparing to take, STEM programs;
- identification of any methods undertaken by the District to date that have been effective (or ineffective) in encouraging and promoting student participation in STEM programs, in particular for Hispanic students;
- identification of any other potential barriers to student participation in STEM programs, in particular any unique to Hispanic students;
- consultation with other urban school districts, as well as education and other experts, concerning effective methods for encouraging minority student enrollment in STEM programs; and
- data collection and surveys and/or personal interviews of students and parents of students in grades 6 through 12, in particular Hispanic students and their parents.

REPORTING REQUIREMENTS: By November 30, 2013, the District will provide OCR with a list of the names and titles of committee members, a schedule of proposed meeting dates, and a plan for conducting the comprehensive assessment, including a copy of any surveys. By March 21, 2014, the District will provide OCR with a copy of the committee's report and recommendations, and make available any information gathered to OCR for review, upon request.

Development of District STEM Plan

3. By May 16, 2014, the District will develop and submit to OCR for review and approval a plan, developed based on committee recommendations and other appropriate sources of input, to ensure equal access to the District's K-8 and high school STEM programs. The plan will specify any related policies, procedures, and activities, include a comprehensive and effective system for evaluating and monitoring implementation of the plan on an annual basis; contain timeframes

within which the actions will be completed and identify the individuals responsible for overseeing each action. Within thirty calendar days of written approval of the plan by OCR, the District will implement the plan.

REPORTING REQUIREMENT: By May 16, 2014, the District will provide OCR with a copy of its draft plan for OCR’s review and approval. By June 19, 2015, and June 18, 2016, the District will provide documentation to OCR relating to its implementation of the plan.

Academic Counseling Services

4. By October 31, 2013, the District will complete an evaluation of its academic counseling services at the high school level and make changes to ensure that students, especially from populations (including Hispanic students and ELL students) underrepresented in STEM programs, receive counseling that:

- informs each student of available program and course options, including information on middle school and high school STEM programs:
 - during individual counseling sessions, and
 - during any group information sessions provided to students about high school enrollment and/or the college application process (group information sessions may include presentations by College admissions coordinators, principals, and teachers of middle school and high school STEM courses/programs; and testimonials from parents/guardians and/or a diverse group of students enrolled in such courses);
- allows each student to meaningfully consider enrollment in the programs or courses that are most likely to meet their educational needs and objectives;
- advises students of the significance given to high school STEM courses/programs, and their course selections by colleges in the admissions process;
- directly and personally encourages each student to enroll in programs or courses that are appropriately challenging and that will appropriately prepare the student for postsecondary level education; and
- notifies parents and students in Spanish and English of the specific transportation services provided by the District that they would be eligible for if enrolled in each of the middle school and/or high school STEM programs and provides information about District busing, how to access the public transportation system (rail, bus, and trolley) and any other information that the District determines to be helpful in the effort to alleviate parent/student concern regarding traveling outside of their home communities.

5. By December 30, 2013, and after completion of the steps outlined above, the District will develop written recommendations based on its evaluation of its counseling services and implement the recommendations, as appropriate, as soon as practicable but no later than registration for school year 2014-2015. The District will thereafter conduct an ongoing evaluation of its academic counseling services and make necessary changes to the services.

REPORTING REQUIREMENT: By December 30, 2013, the District will provide OCR with its written recommendations and steps taken to date to implement the recommendations. By July 31, 2015, and July 31, 2016, the District will provide documentation to OCR relating to additional steps taken to implement the recommendations and/or make changes to its counseling services.

Outreach

6. By December 30, 2013, and on an ongoing basis, the District will take the following steps to ensure that it effectively and widely disseminates detailed information regarding its STEM programs, including the location of the STEM programs and transportation options available for students enrolled in each program, the enrollment process for the STEM programs, and the benefits to students of enrolling in such programs:

- a. establish and air on any existing cable television channel available to the District a bilingual program in Spanish and English focused on the District's STEM programs. Available data regarding viewership will be utilized to air this program at peak times but also to air the program on multiple days and in different time slots, so as to reach the broadest possible audience;
- b. prominently display information about the STEM programs on the District's website and STEM program websites in Spanish and English;
- c. disseminate information regarding the District's STEM programs, in Spanish and English, to community organizations, including those that are in regular contact with the parents of underrepresented students (including Hispanic and ELL students); and
- d. utilize, as appropriate, the community outreach programs available through the Greater Cleveland Regional Transit Authority regarding safety on public transit, public awareness and how-to-ride information.

REPORTING REQUIREMENT: By December 30, 2013, the District will provide OCR copies of the promotional materials and programs described in this item. By July 31, 2014, and July 31, 2015, the District will provide documentation to OCR relating to additional steps taken pursuant to this item.

Student Outreach

7. By January 31, 2014, and by the same date annually thereafter in 2015 and 2016, the District, will implement a targeted outreach plan for students regarding its STEM programs. The outreach plan should reflect the committee recommendations when available. At a minimum, the outreach activities should include peer presentations by Hispanic and ELL students enrolled in STEM programs and information/mentoring geared towards alleviating the concerns associated with traveling outside of their home communities and how to utilize the public transportation system. The District may consider and implement others actions not otherwise described in the agreement in an effort to increase student participation in the District’s STEM programs, including race/ethnic-targeted recruitment and outreach efforts to directly encourage Hispanic and ELL students to consider participation.

REPORTING REQUIREMENT: By February 28, 2014, February 27, 2015, and February 26, 2016, the District will provide to OCR documentation demonstrating that the student outreach plans are being implemented, including copies of any written notices, events, and any other correspondence with students.

ELL Students

8. By October 31, 2013, and annually thereafter by August 15, 2014 and August 15, 2015, the District will provide written notice to parents of students enrolled in the District in grades 6-12 who have been identified as English Language Learner (EL) students that English Language services are available for students who enroll in STEM programs, based on each individual student’s needs. By the same date, the District will include information on its website regarding the availability of English language services for EL students in its STEM programs consistent with the written notice.

REPORTING REQUIREMENT: By November 30, 2013, September 4, 2014, and September 4, 2015, the District will provide documentation to show that it has implemented this item, including a copy of the written notice to parents and a link to the District’s website where the revised language has been posted.

Admissions/Enrollment Criteria

9. By April 11, 2014, based on the recommendations of the District committee, the District will review and revise, as necessary, the admissions process, enrollment criteria and any additional related policies and procedures for enrollment in the District’s STEM program, with a focus on ensuring equal access and an equal opportunity for students to participate. At a minimum, the District will revise admissions policies and procedures to include the following:

- a. a requirement that each person or entity responsible for enrollment at any STEM program that maintains enrollment criteria conduct a review of its application process to ensure that the criteria for enrollment do not directly or indirectly deny or exclude students on the basis of their national origin or their need for English language services;
- b. a requirement that the evaluation of students’ application materials for admission to any District STEM program, including but not limited to any tests, written or verbal essays,

interviews and teacher recommendations, measure the students' ability to meet the specific program requirements and not the students' English language skills;

- c. policies and application materials for STEM programs will specify that schools are prohibited from using the applicants' national origin or English proficiency to exclude or deny otherwise qualified applicants from participation in the program; and
- d. notification of the availability of interpreters to facilitate the application and enrollment process.

REPORTING REQUIREMENT: By April 11, 2014, the District will identify the STEM programs that maintain enrollment criteria, and for each program, will provide to OCR, for its review and approval, copies of the District's revised policies and procedures.

10. Within 60 calendar days of receiving the OCR-approved revised admission policies pursuant to this item, the District will adopt the revised policies procedures, publish them on the corresponding school's website, make copies available at the STEM program tables at the District's school-of-choice fair (choice fair) for eighth graders, and provide copies to the following:

- staff who assist parents in making school choices, including school counselors, transition coordinators, and "flexperts";
- staff in the Student Assignment Office;
- staff at Thomas Jefferson School;
- administrators involved in the admission process at each STEM program, and to the staff members who participate in the admission process or the processing of new student applications and admission decisions at STEM programs; and
- current applicants to STEM programs with selective admission and their parents and/or guardians.

REPORTING REQUIREMENT: Within 60 calendar days of receipt of the OCR-approved revised admissions policies, the District will submit to OCR confirmation that it complied with the notification requirement in this item, such as by providing copies of emails or other notification documents accompanying the revised policies.

District Communication Regarding STEM Programs

11. By October 31, 2013, and by the first day of each subsequent school year thereafter, the District will ensure that interpreters are available at the STEM program tables at the choice fairs, STEM program open houses, and any other District event promoting its STEM programs, and that notices concerning these event publicize the availability of interpreter services. The District will also ensure that existing and newly created written documents that are disseminated to parents and students concerning the District's STEM programs are translated into Spanish, and made available to LEP parents and EL students, including parents and students attending any of the programs at the Thomas Jefferson school, in the same manner as those materials are made available to non-LEP parents and non-EL students. The following documents will be translated into Spanish:

- a. informational and promotional materials, whether available in print, on the District’s website, or disseminated electronically, related to STEM programs at the District, including, but not limited to the following:
 - documents describing the STEM schools (such as the materials disseminated at the eighth grade high school choice fair);
 - materials explaining the benefits of STEM education;
 - materials describing the options available in the District regarding STEM programs for middle school and high school students;
 - information posted on STEM program websites;
 - information about transportation to STEM programs/schools; and
 - information on the District’s website, including links to documents posted on the District’s website such as, but not limited to, the following pamphlets: High Performing Schools, New and Innovative School Choices, Cleveland Metropolitan School District Vision to Victory, and Frequently Asked Questions about Transportation;
- b. documentation (available in print, on the District’s website, or disseminated electronically) related to how to enroll in the District’s STEM programs, including any eligibility criteria, application requirements, admissions tests, essays and suggested preliminary courses to take in preparation for enrollment in the District’s STEM programs;
- c. the District’s standard registration/enrollment forms, including the computer-based enrollment applications and the District’s enrollment website;
- d. the mailers sent to parents prior to the beginning of the school year notifying parents of high school students that if they reside more than three miles from the school in which their child enrolls, their child is eligible for Regional Transit Authority transportation at no charge; and
- e. notices distributed District-wide to parents and/or students regarding programs or events that have a STEM theme or are geared towards students who are interested in a STEM-based curriculum.

REPORTING REQUIREMENT: By October 31, 2013, and by the same date annually thereafter, the District will submit to OCR documentation demonstrating its implementation of this item, including lists of interpreters who have attended STEM events, copies of the documents the District has translated, information to show that it posts translated documents on the District website, and translates information on the websites of the STEM programs, documentation to show that the District provides translations of its enrollment forms, translates the information on its website, and provides copies of notices to parents and students.

District Personnel Training

12. By September 26, 2014, and by the same date annually thereafter, the District will develop and provide annual training for relevant District and school site administrators and staff regarding STEM programs. The District will ensure that the training includes, at a minimum:

- a. A review of the enrollment demographics in STEM, by race, national origin, and ELL status, at each STEM site and in the District; a presentation by an expert, which may be the consultant(s), in best practices for identification/selection and retention of underrepresented students (including Hispanic and ELL students) for STEM programs;
- b. An overview of the identification/selection criteria for these programs;
- c. An overview of parent/guardian and student outreach efforts regarding these programs; and
- d. Information or instruction regarding other actions the District may be taking in an effort to increase student participation in the District's STEM programs, including race/ethnic-targeted recruitment and outreach efforts to directly encourage Hispanic and ELL students to consider participation.

REPORTING REQUIREMENT: By December 31, 2014, and December 31, 2015, the District will submit to OCR documentation regarding the training provided to District administrators and staff, including the dates of the training, the trainers, and the attendees.

Monitoring of STEM Plan

13. By October 31, 2015 and October 31, 2016, the District will conduct an evaluation of the effectiveness of its STEM plan, including an analysis of data related to the enrollment of students in STEM programs each school year, to determine whether students of all races and national origins and ELL students were provided equal access and an equal opportunity to participate in these programs. The District will revise the STEM plan developed pursuant to item 2 and related policies, procedures and practices as appropriate based on its evaluation

REPORTING REQUIREMENT: By October 31, 2015, and October 31, 2016, the District will submit to OCR a copy of its analysis and any revisions to its STEM plan. At a minimum, the information provided for each school year should include:

- a) the number of students enrolled in each STEM program, by race, national origin, and ELL status;
- b) the number of students who applied for enrollment to each STEM program, by race, national origin, and ELL status;
- c) the number of students who were selected for enrollment at each STEM program, by race, national origin, and ELL status;

- d) the number of students who enrolled in each STEM program, by race, national origin, and ELL status; and
- e) the District’s analysis of whether selections were disproportionate for any students, including Hispanic students, and/or ELL students; and if so, the plan for addressing any problems identified.

GENERAL REQUIREMENTS

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 Title VI and its implementing regulation at 34 C.F.R. §§ 100.3(a) and (b), which were at issue in this complaint.

The District 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 this Agreement. Further, the District understands that during the monitoring of this Agreement, if necessary, 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 fulfilled the terms of this Agreement and is in compliance with Title VI and its implementing regulation at 34 C.F.R. §§ 100.3(a) and (b).

The District 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 District written notice of the alleged breach and a minimum of sixty (60) calendar days to cure the alleged breach.

_____/s/_____
Superintendent or designee

11/4/13
Date