

**RESOLUTION AGREEMENT**  
Northwestern Regional School District No. 7  
OCR Case No. 01-14-1235

In order to resolve OCR Case No. 01-14-1235, Northwestern Regional School District No. 7 (the District) assures the U.S. Department of Education, Office for Civil Rights (OCR) that it will take the actions detailed below pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part 104; and Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. § 12131 et seq., and its implementing regulation at 28 C.F.R. Part 35.

**ACTION ITEM 1:**

By June 1, 2016, the District will develop and submit to OCR, for its review and approval, a worksheet to be used for documenting all reports of a student's suspected violation of the District's residency policy and subsequent investigation, if applicable. The worksheet will be based upon a model document prepared by the State Department of Education, and will include: a) a summary of the information being relied upon to initiate a residency inquiry (with supporting documentation, if received or existing, attached); b) the name/type of the source of the information; c) the date that such information was received; and d) further action taken by the District. The District's Director of Finance and Operations (or his/her designee) will continue to be responsible for conducting such inquiries and investigations, and as such will be responsible for the compiling of necessary paperwork (including the worksheet), consistent with District policy and the law. Nothing herein shall be deemed to affect the guidelines that the District (or the State of Connecticut) utilizes for determining residency and entitlement to school accommodations, as defined by Conn. Gen. Stat. § 10-186.

**Reporting Requirements:**

- a) By June 15, 2016, the District will provide documentation demonstrating that it has formally adopted the worksheet in accordance with Action Item 1 above, and provide the name, title, and contact information for the District's Director of Finance and Operations (or his/her designee) responsible for overseeing the implementation of the worksheet.
- b) By June 15, 2016, the District will provide documentation demonstrating that the District's Director of Finance and Operations (or his/her designee) received appropriate training in the requirement to use the worksheet and maintain records described in Action Item 1 above.
- c) By June 15, 2017, the District will provide copies of the worksheet, with supporting documentation, if received or existing, maintained in accordance with Action Item 1 above.

**ACTION ITEM 2:**

The District has provided training to relevant staff with regard to non-discrimination and retaliation, including those issues addressed by Section 504 and Title II. Nevertheless, by October 1, 2016, the District will again provide training to District administrators, case managers, teachers, and other relevant staff at the District, regarding the prohibition against retaliation, as described in the regulations implementing Section 504 and Title II.

The training, which may be part of the in-service programs and/or faculty meetings that the District conducts for its professional staff, will include a discussion of the following: (a) the District's anti-retaliation policy; (b) what constitutes a protected activity; (c) the prohibition on adverse actions in response to those protected activities; (d) recognizing acts of retaliation and intimidation, and their effects on individuals who engaged in protected activities; and (e) that the District will take effective action, including disciplinary action where appropriate, against any staff member found to have engaged in retaliatory conduct.

**Reporting Requirement:**

- a) By October 15, 2016, the District will provide documentation to OCR demonstrating that training was provided in accordance with Action Item 2 above; including: (a) the name(s) and credentials of the individuals who conducted the training; (b) the date(s) of the training; (c) copies of any training materials distributed; and (d) proof of attendance by the above-mentioned District staff.

**MONITORING:**

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 fulfilled the terms of this Agreement and is in compliance with the regulations implementing Section 504, at 34 C.F.R. Section 104.61, and Title II, at 28 C.F.R. § 35.134. 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 regulation implementing Section 504, at 34 C.F.R. Section 104.61, and Title II, at 28 C.F.R. § 35.134. 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.

This Agreement has been entered into voluntarily by the District and does not constitute an admission that it is not in compliance with Section 504 or Title II or their implementing

regulations. The District denies that it engaged in any conduct in violation of these laws and regulations enforced by OCR, but it wishes to resolve all matters in order to avoid further contested proceedings, and appreciates the technical assistance that OCR has offered to it.

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District Superintendent

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Date