

## **VOLUNTARY RESOLUTION AGREEMENT**

### **Gloucester County Vocational School District Case No. 02-18-1146**

In order to resolve Case No. 02-18-1146, the Gloucester County Vocational School District (the District) assures the U.S. Department of Education, Office for Civil Rights (OCR), that it will take the actions detailed below pursuant to the requirements of Title VI of the Civil Rights Act of 1964 (Title VI), as amended, 42 U.S.C. § 2000d et seq., and its implementing regulation at 34 C.F.R. Part 100.

By entering into this Agreement, the District does not admit to any liability or wrongdoing, and nothing herein shall be construed as an admission of liability or wrongdoing.

#### **Action Item 1:**

By November 1, 2018, the District will complete an investigation of all reports it received of alleged incidents of racial harassment at the Gloucester County Institute of Technology (the Institute) during school year 2017-2018. The investigation will include a review of all information previously provided to District staff regarding alleged incidents of racial harassment; interviews of all witnesses identified and re-interviews of witnesses, as appropriate; and a determination regarding whether the alleged harassing conduct occurred and, if so, whether a racially hostile environment existed at the Institute during school year 2017-2018. If the evidence supports a determination that a racially hostile environment existed at the Institute during school year 2017-2018, the District will take prompt and effective action reasonably calculated to stop the harassing conduct, prevent its recurrence, and, as appropriate, remedy its effects.

#### **Reporting Requirements:**

- a) By December 1, 2018, the District will submit to OCR a report documenting the procedures used to conduct its investigation as outlined in Action Item 1 above, as well as the outcome of the investigation; any actions deemed necessary; and a timeline for implementation of any actions deemed necessary. The District will also provide to OCR copies of all documentation related to both the investigation and any actions taken based on the results of the investigation.
- b) By July 31, 2019, the District will submit documentation to OCR of the District's responses to all complaints and oral reports of discrimination (including harassment) on the basis of race made during school year 2018-2019. The documentation will include, at a minimum: (a) a copy of each complaint or a description of each orally reported alleged incident of racial discrimination/harassment; (b) the names of the student(s) involved, or unique identifiers for the student(s) involved; (c) the date(s) of receipt of the written complaint or oral report; (d) information about the individual(s) who received and processed the complaint or oral report; (e) the status of the

investigation of the complaint or oral report; and (f) the outcome of all completed investigations, and any disciplinary sanctions imposed or remedial measures taken.

**Action Item 2:**

By November 1, 2018, the District will provide training to all District staff directly involved in processing, investigating and/or resolving complaints or other reports of racial discrimination (including harassment). The training will review the District's policies and procedures for investigating discrimination/harassment complaints; and, include instruction on how to conduct and document discrimination/harassment investigations in an adequate, reliable and impartial manner, including the appropriate legal standards to apply in such investigations and the range of possible disciplinary sanctions and remedial actions.

**Reporting Requirement:** By December 1, 2018, the District will provide documentation to OCR demonstrating that training was provided consistent with Action Item 2 above, including: (a) the name(s) and credentials of the individual(s) who conducted the training; (b) a list of the individuals who attended the training and their positions; (c) the date(s) the training was conducted; and (d) copies of any training materials disseminated.

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. Upon the District's satisfaction of the commitments made under this Agreement, OCR will close this case.

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 will give the District written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

This Agreement will become effective immediately upon the signature of the District's representative below.

8/15/2018  
Date

\_\_\_\_\_/s/\_\_\_\_\_  
Michael Dicken, Superintendent  
Gloucester County Institute of Technology