



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS, REGION IV

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REGION IV  
ALABAMA  
FLORIDA  
GEORGIA  
TENNESSEE

August 18, 2015

Dr. Nancy J. Graham, Ed. D  
Superintendent  
2855 Colonial Blvd.  
Fort Myers, FL 33966

Re: Complaint #04-15-1172

Dear Dr. Graham:

The U.S. Department of Education (Department), Office for Civil Rights (OCR) has completed its investigation of the above referenced complaint filed on January 26, 2015 against the Lee County School District (District) alleging retaliation on the basis of disability. Specifically, the Complainant alleged that the District retaliated against her between December 2013 and September 2014 by refusing to provide her with her daughter's (Student) complete academic file and by refusing to remove a code (W-22) that erroneously indicated that the Student had dropped out of school, following the Complainant's complaints to the District that it had failed to adequately investigate or respond to bullying against the Student, who has a disability. The Student has been diagnosed with asthma and angioedema.

As a recipient of Federal financial assistance from the Department, the District is subject to the provisions of Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. §794, and its implementing regulation, 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability. As a public entity, the District is also subject to the provisions of Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. §§ 12131 *et seq.*, and its implementing regulation, 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability. Accordingly, OCR has jurisdiction over this complaint.

OCR investigated the following legal issue:

Whether the District retaliated against the Complainant between December 2013 and September 2014 by: (1) refusing to provide the Complainant with a complete copy of the Student's academic file; and (2) refusing to remove a code (W-22) that identified the Student as a dropout, following the Complainant's complaints that the District failed to adequately investigate or respond to bullying against the

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Student, who has a disability, thereby violating Section 504 implementing regulation at 34 C.F.R. § 104.61, and the Title II implementing regulation at 28 C.F.R. § 35.134.

In reaching a determination, OCR reviewed and analyzed documents relevant to the complaint issues and interviewed the Complainant and District personnel. OCR evaluates evidence obtained during an investigation under a preponderance of the evidence standard to determine whether the greater weight of the evidence is sufficient to support a conclusion that a recipient (such as the District) failed to comply with a law or regulation enforced by OCR or whether the evidence is insufficient to support such a conclusion. Based on a thorough review of the evidence gathered during its investigation, OCR finds sufficient evidence to support a finding that the District failed to comply with Section 504 and Title II by refusing to provide the Complainant with a complete copy of the Student's academic file and by refusing to remove a code that identified the Student as a dropout, following the Complainant's reports that the District failed to adequately investigate or respond to bullying against the Student, who has a disability. The legal and factual bases for our determination are set forth below.

### **Applicable Legal Standards**

Retaliation is prohibited under the Section 504 implementing regulation at 34 C.F.R. § 104.61, which incorporates by reference the provisions of 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. § 100.7(e). This Title VI regulation provides that no recipient or other person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by the laws OCR enforces, or because he or she has made a complaint, testified, assisted, or participated in any manner in an investigation or other matter in connection with a complaint.

When OCR investigates retaliation allegations, it uses a four-part *prima facie* analysis. A *prima facie* case of retaliation is established by showing: 1) an individual engaged in a protected activity (e.g., opposed a discriminatory policy, asserted protected rights, or participated in an OCR complaint or proceeding); 2) the recipient was aware of, or had knowledge of, the protected activity; 3) the recipient took adverse action against the individual contemporaneously with or subsequent to the individual's participation in the protected activity; and 4) there was an inferable causal relationship between the adverse action and the individual's participation in the protected activity.

If a *prima facie* case of retaliation is established, OCR examines whether the recipient can articulate a legitimate, non-discriminatory reason for its actions. If the recipient asserts a reason for its actions, OCR analyzes whether the reason articulated by the recipient is a pretext, or cover-up, for retaliation.

As the Title II implementing regulation provides no greater protection than the Section 504 implementing regulation with respect to the complaint allegations, OCR conducted its investigation in accordance with the applicable Section 504 standards.

## **Factual Findings and Analysis**

During the 2013-2014 school year, the Student was enrolled in 7th grade at Lexington Middle School (School). The District did not identify the Student as a student with a disability.<sup>1</sup> However, the Complainant stated that she notified the District that the Student had XXXX and provided documentation to the District explaining the seriousness of the condition. OCR interviewed the District's former XXXX who compiled the Student's records when the Student matriculated in the School. The XXXX recalled that the Student's file was larger than other student files due to the inclusion of medical documentation. In addition, the XXXX spoke with the XXXX at the School several times to inform her of the Student's condition.

### Protected Activity

OCR finds sufficient evidence that the Complainant engaged in protected activity. On November 26, 2013, the Complainant reported to the District and the School Board that the Student was being bullied and assaulted at the School.<sup>2</sup> Thereafter, in a December 2013 complaint to the Superintendent, the Complainant contended that the School failed to recognize and take into consideration, the Student's medical condition, which can be stress-induced and which reported "can be fatal." The Complainant also reported to OCR, that on November 26, 2013, via email, she complained to the XXXX, among others, that the School's XXXX failed to "identify" the Student despite her medical history and used the Student's disability to create a hostile environment, among other allegations. On December 13, 2013, the Complainant removed the Student from the School.

Additional instances of protected activity included a September 10, 2014 email, which echoed the concerns in the Complainant's November 26, 2013 email and a September 23, 2014 request for a due process hearing submitted by an advocate (Advocate) on behalf of the Student, seeking, among other remedies, recognition by the District that the Student was an exceptional education student and requesting the creation of an appropriate Individualized Education Plan (IEP) for the Student. In addition, the Complainant filed a complaint with OCR on October 8, 2014.

### Notice of the Protected Activity

OCR finds that the District had notice of the Complainant's protected activity. The Complainant filed complaints and requests with various District personnel including its Board of Education beginning in November 2013, seeking to address the bullying of the Student, establish a plan for protecting her so that her medical condition was not exacerbated, and address the School's alleged harassment of the Student based on her disability after she filed the bullying complaint. The District produced copies of these communications in response to OCR's data request. In addition, the District received notice of OCR Complaint No. 04-15-1012 through a letter from

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<sup>1</sup> OCR is investigating whether the District failed to evaluate the Student consistent with 34 C.F.R. § 104.35 in OCR Complaint No. 04-15-1012.

<sup>2</sup> OCR is investigating the alleged bullying in OCR Complaint No. 04-15-1012.

OCR dated November 5, 2014. Therefore, the evidence is sufficient to establish that the District had notice of the Complainant's protected activity.

### Adverse Actions Contemporaneous with or Subsequent to Protected Activity

In determining whether an action is adverse, OCR examines whether the recipient's action significantly disadvantaged an individual in his or her ability to gain the benefits of the recipient's program. To make this determination, OCR considers whether the alleged adverse action caused lasting and tangible harm, or had or could reasonably have a deterrent effect. OCR makes this determination on a case-by-case basis and in light of all the facts and circumstances of the case.

Even if the challenged action did not meet this standard because it did not objectively or substantially restrict an individual's opportunities, the action could be considered to be retaliatory if the challenged action could reasonably be considered to have acted as a deterrent to further protected activity, or if the individual was, because of the challenged action, precluded from pursuing his or her discrimination claims.

The Complainant alleged that the District took the following two adverse actions against her.

#### **1. The District refused to provide the Complainant with a complete copy of the Student's academic file.**

The Complainant alleged that between February 2014 and August 26, 2014, despite communications with various members of the District's staff, the District failed to provide her with copies of the Student's complete educational file. During an interview with OCR, the Complainant explained that in January 2014, she began making requests to the District for copies of the Student's records. The Complainant stated that initially she made approximately three phone calls to the District's XXXX seeking "all" of the Student's records. In subsequent conversations with the XXXX, she specifically sought, "school, nursing, medical notes, teacher's notes, and any and all comments and incident reports, history of calls to pick her up and her leaving school. . ."

The Complainant contended that in February, March, April, and May 2014, she spoke with the XXXX. The Complainant alleged that during these conversations, the XXXX told her that the Student's records were not at the District's main office and ultimately that there was nothing the XXXX could do. The Complainant submitted an email request to the School's XXXX on July 1, 2014 seeking to review the Student's file. The XXXX responded on August 6, 2014 stating that he hoped someone had assisted the Complainant. The Complainant responded the same day and requested the records again.

On August 8, 2014, the XXXX reported that he submitted the Student's records to the District's main office. On August 10, 2014, he told the Complainant that the District's main office should have received the records that day. The Complainant went to the District's main office on August 26, 2014 to retrieve the Student's records. She contends that the District did not provide her with the Student's complete file because the file was approximately only twenty (20) pages,

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and did not include the Student's immunization records, doctor's notes, or her transfer request. The Complainant further alleged that she did not receive additional documents from the Student's file until September 11, 2014, when the XXXX emailed her documents that were not contained in the file she received on August 26, 2014.

The Complainant further stated that the September 11, 2014 production contained hundreds of pages of documentation, but was still not all that she requested. The Complainant noted that the missing categories of documents included attendance records (including doctor's notes she submitted to the School as justifications for the Student's absences) and documentation she submitted requesting that the Student be transferred. OCR reviewed the documentation that was provided to the Complainant on September 11, 2014. The documentation did not contain any documentation of the Complainant's transfer request or doctor's notes submitted to the School by the Complainant.

The Complainant explained that on September 23, 2014 she enlisted the assistance of a child advocate (Advocate) who requested a release of all educational records that contained the Student's personal identifying information no matter how stored. The Complainant stated that no additional records were provided to the Complainant or the Advocate. As a result of the District's failure to provide the Student's complete file, the Complainant contends that she was unable to offer the proof required to obtain social security benefits for the Student.

During OCR's interviews, the District's XXXX stated that she provided the Student's file to the Complainant within one week of her initial request. However, the XXXX confirmed that he did not transfer the Student's file to the District's main office until August 8, 2014. Further, the District's documentation contained a document, dated August 26, 2014, which appeared to be a receipt for payment for the production of the Student's records. Attached to this document, was a separate sheet of paper with the hand-written words, "Mom P/U copies 8-26-14."

Further, the XXXX told OCR that the Complainant's initial request was only for the Student's cumulative file. However, she acknowledged that the Complainant also requested nurses' notes, which are not a part of the cumulative file. The XXXX told OCR that she advised the Complainant that the nurses' notes must be requested directly from the School. The evidence shows that the Complainant did make a request directly to the School in addition to requesting records through the District's XXXX.

Applying the preponderance of the evidence standard, OCR concludes that despite requesting the records in January or February of 2014, the District did not produce any records to the Complainant until approximately six months later on August 26, 2014. Further, OCR finds that the District did not initially provide the Complainant with a complete copy of the Student's records.

In addition, the preponderance of the evidence supports a finding that the District has continued in its failure to produce the records requested by the Complainant. The Complainant sought "school, nursing, medical notes, teacher's notes, and any and all comments and incident reports, history of calls to pick her up and her leaving school. . ." and all educational records that contain

the Student's personal identifying information no matter how stored. To date, OCR has found no evidence that the District delivered the records sought to the Complainant.

**2. The District included a dropout code in the Student's file and refused to remove the code from the Student's file.**

The Complainant alleged that in retaliation for her complaints of discrimination, the District added a "dropout" code (W-22) to the Student's file and refused to remove the code upon request. The Complainant contends that the W-22 code would reflect poorly on the Student when viewed by colleges and universities.

The Complainant first learned that a W-22 code was added to the Student's file when seeking her records from the XXXX in April 2014. During the first week of September 2014, the Complainant spoke with XXXX for the District about removing the code. According to the Complainant, XXXX agreed to do so provided she informed him of where the Student was now enrolled. The Complainant contends that she told XXXX the name of the private school where the Student was enrolled.

During an OCR interview, XXXX confirmed that the Complainant requested the removal of the W-22 code. However, he stated that he only told the Complainant that he would look into the matter. XXXX explained that when he looked into the matter he found that the W-22 code had been placed in the Student's file because the Complainant had refused to tell a District Social Worker (Social Worker) the name of the Student's new school. When asked whether he inquired about removing the W-22 code, the District's XXXX stated that he did not.

When OCR interviewed the District XXXX, she explained that she does not consider the W-22 code a "dropout code;" however, she stated that the State of Florida provides the student coding definitions. OCR reviewed the Florida Department of Education's Information Database Requirements concerning "ATTENDANCE RECORDKEEPING REQUIRED CODES FOR GRADES PK-12 STUDENTS." The requirements indicate that "Dropout codes are designated by an asterisk." Code W-22 is designated with an asterisk and reads, "Any KG-12 student whose whereabouts is unknown and required documented efforts to locate the student are maintained per s. 1003.26, Florida Statutes."

Applying the preponderance of the evidence standard, OCR finds that the District coded the Student as W-22, which is a designated "dropout" code and as such could impact the Student's future educational opportunities. OCR also finds that the District declined to remove the code upon the Complainant's request. The District's actions -- the initial coding and the ongoing failure to change the W-22 code -- can reasonably be considered a deterrent from further protected activity. As such, OCR finds sufficient evidence to establish that the District took an adverse action against the Student and Complainant and that the adverse action occurred subsequent to the Complainant's protected activity.

## Causal Connection

Having established that the Complainant engaged in a protected activity, that the District had knowledge of the protected activity, and that the District's action could be considered an adverse action, OCR assessed the evidence to determine whether there was a causal connection between the protected activity and the adverse action. Causal connection can be inferred by establishing any of the following: closeness in time between the date of the protected activities and the adverse actions, change in treatment of the individual after the recipient had knowledge of the protected activity, different treatment of the individual compared to other similarly-situated persons who did not engage in protected activity, or deviation from established policies or practice.

Following the Complainant's November and December 2013 complaints of conduct in violation of Section 504, the Complainant began seeking the Student's academic records in January 2014. Following her requests for the Student's records, the District delayed in providing the Student's records for approximately six months. During that six-month period, the Complainant continued to complain about the District's discriminatory conduct. Thus, OCR concludes that there is sufficient temporal proximity between the Complainant's complaints and the District's failure to produce the Student's records to conclude that a causal connection exists.

Because the Complainant's initial complaints were made in November 2013, and the W-22 was added to the Student's file in January 2014, OCR finds that there is sufficient evidence to establish a causal connection based upon the temporal proximity between the Complainant's protected activity and the District's adverse action (coding the Student as W-22). There is also temporal proximity between the protected activity occurring in September 2014 and October 2014 and the District's continuing failure to remove the W-22 code.

## Legitimate Non-Discriminatory Reason

OCR next considered whether the District provided a legitimate, non-discriminatory reason for the adverse action that is not a pretext for discrimination.

### **1. The District refused to provide the Complainant with a complete copy of the Student's academic file.**

In support of its actions, the District contends that the Complainant, in fact, timely received copies of the Student's academic records, as requested and consistent with the District's policies. The District's written policy, "Policy 4.19" entitled "Student Records," provides that documents are to be provided to parents within 30 days of a written request. According to the XXXX and the XXXX, who is responsible for oversight of the Student Records/Services Department, student records are typically made available to parents within one to two days of a request. The XXXX reported that in practice, parental requests for records do not need to be in writing and can be made verbally.

As discussed above, OCR found that the District did not provide the Complainant with a complete copy of the Student's records until approximately six months after her original request,

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although it provided some documents. The District has provided no explanation for the six-month delay. Moreover, OCR notes that the delay in providing documents to the Complainant was a deviation from District practices and the District's written policy.

Based upon the foregoing, OCR finds that the District articulated a legitimate non-discriminatory reason for providing only limited records to the Complainant in August 2014 but did not articulate a legitimate nondiscriminatory reason for the delay in providing records or the failure to provide the additional documents she requested through her advocate.

**2. The District included a dropout code in the Student's file and refused to remove the code from the Student's file.**

In support of its addition of code W-22 to the Student's file, the District contends that it did so because the Complainant refused to inform the District of the Student's whereabouts. Therefore, OCR finds that the District articulated a legitimate non-discriminatory reason for its actions.

Pretext

If OCR finds that the recipient has offered a legitimate nondiscriminatory reason for the adverse action, OCR further investigates to determine if the reason provided is a pretext for discrimination. Pretext may be shown by evidence that: (1) the explanation for the adverse action is not credible or believable; (2) the individual was treated differently than other individuals who were similarly situated but had not engaged in a protected activity; (3) the treatment of the individual was inconsistent with established practice or policy; or (4) the recipient took adverse action against other individuals who engaged in a protected activity.

**1. The District refused to provide the Complainant with a complete copy of the Student's academic file on August 26, 2014.<sup>3</sup>**

As previously discussed, the preponderance of the evidence establishes that the Complainant was provided only a portion of the Student's records on August 26, 2014. OCR reviewed written District policies to determine whether the failure to provide all of the requested records was consistent with such policies. District Policy 4.19 states that "[t]he right to access student records by the parent/guardian or eligible student includes the right, upon request, to be shown any record or report relating to the student maintained by the District and that, upon a reasonable request, the school shall furnish such parent or student with an explanation or interpretation of any such record or report."

In addition, Policy 4.19 requires that each school maintain a permanent cumulative record for each student enrolled, including the following "Category A Records": number of days present and absent, date enrolled, date withdrawn; courses taken and record of achievement, such as

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<sup>3</sup> Since the District did not articulate a legitimate nondiscriminatory reason for failing to provide the additional records in September 2014 or thereafter, the pretext discussion focuses only on the initial production of documents in August 2014.

grades, units, or certification of competence; and, the date of graduation or date of program completion.

Policy 4.19 also identifies “Category B Records” which schools may maintain temporarily. This category includes health information. Policy 4.19 provides that student cumulative folders will be maintained at various District locations depending on the student’s enrollment status.

In addition to Policy 4.19, OCR reviewed the “Student Records Handbook,” (Records Handbook) found on the District’s website.<sup>4</sup> The Records Handbook provides a statement of the right to access “any record or report relating to such pupil or student maintained by any public educational institution.” The Records Handbook identified a list of documents maintained in “Category A records,” which differed slightly from Policy 4.19.

The Records Handbook designates a student’s “immunization and vaccine status” as a Category A record, while Policy 4.19 does not. Further, in addition to the items contained in the Category B Records identified in Policy 4.19, the Records Handbook also includes in this category current registration/enrollment withdrawal forms. The Records Handbook’s “Procedures for transfer of education record” states that if no request for records of a withdrawn student has been made within 20 school days, among other steps, the records, for which no requests have been made, should be sent to Student Records along with a verified copy of the permanent record and withdrawal form.

During her OCR interview, the XXXX stated that generally not all information is required to be maintained in a student’s cumulative file. She stated that her office would maintain only the cumulative files, but that other documents related to students could be maintained in various other District offices (i.e. at a school site or in one of three student assignment offices etc.). Generally, the XXXX explained that discipline records and medical information, such as nurse’s notes, would not be maintained in a student’s cumulative file. She stated that these documents would have to be retrieved from a student’s school.

OCR finds sufficient evidence of pretext because despite its articulation that it provided the Complainant with the Student’s records in a manner consistent with its policies, the evidence showed that the District’s response(s) to the Complainant’s requests were not consistent with its established practices or policies.

District policies and the witnesses’ explanations of practices reflect that the District does not maintain all categories of student documents in one location and that the cumulative file does not contain all student records. However, the evidence does not show that the Complainant only requested the Student’s cumulative file. The XXXX acknowledged that the Complainant’s verbal request included a request for nurses’ notes. Further, the only written request -- the Complainant’s July 1, 2014 email to the XXXX-- was a general request for the Student’s records. District Policy 4.19 fails to support providing only limited documents in response to a general request for records. Further, based upon the written policy, the Student’s records should have been transmitted to the District Office as of the time of the Complainant’s initial request

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<sup>4</sup> See [http://studentservices.leeschools.net/archive/Student\\_Rec\\_old/welcome.htm](http://studentservices.leeschools.net/archive/Student_Rec_old/welcome.htm).

and it should not have been necessary for the Complainant to submit requests to multiple District offices in order to obtain all of the Student's records.

**2. The District included a dropout code in the Student's file and refused to remove the code from the Student's file.**

In an OCR interview, a District XXXX explained that on January 30, 2014, she contacted the Complainant pursuant to her attendance duties. She explained that she asked the Complainant why the Student had not been in school. The XXXX contends that the Complainant informed her that she feared for the Student's safety and did not want to tell the District where the Student was located due to recommendations from her doctor related to the Student's severe health issues. The XXXX said she added the W-22 code because that is the code used when a student has moved out of the area or the school does not know where the student is now attending school.

When asked about her next steps after the Complainant refused to inform the School of the Student's whereabouts, the XXXX explained that she executed the W-22 form. She explained that if she had not done so, she would have had to leave the Student on the roster and begin truancy procedures. She explained that had she not entered the W-22 code, the Complainant would have had to appear before a judge for educational neglect. The XXXX's statements were consistent with Florida Statute 1003.26. The XXXX explained that every student must have a code. Thus, she had to code the Student with a code.

The XXXX confirmed that the Student's W-22 code could be changed, and "ideally" would be changed, if the Complainant informed the District of what private school the Student was attending. The XXXX ultimately acknowledged that she would not need to know the specific school to change the code.

In a follow-up interview, the Complainant stated that in January 2014, she got a call from the School's XXXX. She explained that the XXXX asked her where the Student was enrolled. The Complainant explained that she told the XXXX that the Student was enrolled in and attending a private school, but declined to inform the XXXX of the name of the private school. In the Advocate's September 23, 2014 request for a due process hearing, he informed the District of the exact location of the child's school. Yet, as of April 7, 2015, the W-22 code Student remained in the Student's file.

**Conclusion**

OCR finds insufficient evidence of pretext with respect to the District's articulated reason for adding the W-22 code. The XXXX and Complainant provided conflicting accounts of their January 2014 conversation about the Student's whereabouts. However, the XXXX's explanation of why she added the W-22 code to the Student's file was consistent with Florida law regarding attendance. Although the XXXX articulated a mistaken belief that the W-22 code was a withdrawal code that merely indicated that the Student's whereabouts were unknown, she further explained that she coded the Student as W-22 so that she would not have to follow the District's legal obligations with respect to truancy. Applying the preponderance of the evidence standard,

OCR finds that the evidence is insufficient to establish that the District's legitimate non-discriminatory reason for adding the W-22 code to the Student's file was a pretext for retaliation.

However, OCR finds sufficient evidence to conclude that the District's failure to remove the Student's W-22 code following the Complainant's request was a pretext for retaliation. OCR does not find the District's reason for leaving the W-22 code in the Student's file credible because the District had the information necessary to merit a change in the code. In September 2014, the Complainant informed XXXX that her Student was attending private school. Further, via the Advocate's September 23, 2014 due process hearing request, the District was informed of where the Student was enrolled. During her OCR interview, the XXXX confirmed that this information was sufficient to change the Student's coding. As of April 7, 2015, the W-22 code remained in the Student's file.

Accordingly, there is sufficient evidence to establish that the District retaliated against the Complainant when it refused to change a code in the Student's file following the Complainant's protected activity, thereby violation the regulations implementing Section 504 and Title II.

The District has agreed to the enclosed Resolution Agreement (Agreement), which commits the District to take specific steps to address the identified areas of noncompliance, including removing from the Student's school record the W-22 code and providing District staff anti-retaliation training. When fully implemented, the Agreement entered into by the District will resolve the issues of noncompliance. OCR will monitor the implementation of the agreement until the District is in compliance with the statutes and regulations at issue in this matter.

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This concludes OCR's investigation of the complaint and should not be interpreted to address the District's compliance with any other regulatory provision or to address any issues other than those addressed in this letter. The Complainant may have the right to file a private suit in federal court regardless of whether OCR finds a violation.

This letter sets forth OCR's determination in an individual OCR case. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. If we receive such a request, we will seek to protect, to the extent possible, any personally identifiable information, which if released could reasonably be expected to constitute an unwarranted invasion of personal privacy.

Please be advised that the District may not harass, coerce, intimidate, or discriminate against any individual because he or she has filed a complaint, or participated in the complaint resolution process. If this happens, the Complainant may file another complaint alleging such treatment.

This concludes OCR's consideration of this complaint, which we are closing effective the date of this letter. If you have any questions regarding this matter, please contact Cerrone Coker, at (404) 974-9318, or Andrea de Vries at (404) 974-9314.

Sincerely,

Melanie Velez  
Regional Director