

**Coweta County School District, Georgia**  
**Resolution Agreement**  
**OCR Docket Number 04-18-1318**

The U.S. Department of Education (Department), Office for Civil Rights (OCR) and the Coweta County School District (District), enter into this agreement to resolve the allegations in the above-referenced complaint. This agreement does not constitute an admission of liability, non-compliance, or wrongdoing by the District. The District agrees to take the following actions to ensure compliance with Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d *et seq.*, and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color or national origin by recipients of Federal financial assistance.

Prior to the completion of OCR's investigation, the District agreed to resolve the issues of this investigation pursuant to Section 302 of OCR's Case Processing Manual. Accordingly, the District agrees to take the following actions:

**Harassment Training**

1. **By November 9, 2018**, the District will submit to OCR for review and approval a copy of the materials to be used for its racial harassment training to all administrators, all teaching staff, and staff members involved in investigating complaints at 8th Grade Charter College and Career Academy (Academy), as well as staff members involved in investigating complaints at the District high schools, which will include an emphasis on recognizing harassment on the basis of race or national origin (conduct 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) and examples of peer harassment, how to conduct effective investigations into claims of racial harassment, how to implement harassment prevention strategies school-wide, and the obligation to respond to complaints of racial harassment in a manner consistent with Title VI and its implementing regulation.

**REPORTING REQUIREMENT: By December 30, 2018**, or within 15 days of completing the training required in Item #1, whichever is earlier, the District will submit to OCR documentation of the training, including a list of attendees, a copy of all material distributed, and the identity and qualifications of the person or persons conducting the training.

2. **By November 9, 2018**, the District will submit to OCR for review and approval a copy of the materials to be used for its racial harassment training to the students at the Academy regarding the prohibition of racial and national origin harassment. The training provided to the students will include a definition of harassment, how to recognize harassment, age-appropriate examples of harassment, including peer harassment, and how to report harassment and the prohibition on retaliation for reporting harassment or participating in an investigation of alleged harassment.

**REPORTING REQUIREMENT:** By **December 30, 2018**, or within 15 days of completing the training required in Item #2, whichever is earlier, the District will provide OCR with documentation from the training, including a list of attendees, a copy of all material distributed, and the identity and qualifications of the person or persons conducting the training.

**Recordkeeping for Racial Harassment Complaints**

3. **By November 9, 2018**, the District will amend, and submit to OCR for review and approval, District Policy JCE-R(1), which will include a record-keeping procedure for investigating formal and informal complaints of racial harassment of students, as well as harassment incidents of which the District has notice through other means. The District's amended policy will require the individuals responsible for investigating complaints of racial harassment to document the steps taken during the investigation, which may include investigator notes, witness interviews, evidence submitted by the parties, investigative reports and summaries, and any final disposition letters to the parties, which should include any corrective actions taken and remedies provided by the District and/or School if racial harassment was determined to have occurred. The amended policy will also require the maintenance of all documents related to the complaint and the investigation.

**REPORTING REQUIREMENT:** After OCR approves the amendments to District Policy JCE-R(1), the District will include training on the amended policy at the same time that it provides the training required in Item #1 of this Agreement. **By December 30, 2018**, or within 15 days of completing the required training, whichever is earlier, the District will submit to OCR documentation of the training, including a list of attendees, a copy of all material distributed, and the identity and qualifications of the person or persons conducting the training.

The District understands that by signing this agreement, it agrees to provide the foregoing 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 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 shall 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 signature of the District's representative below.

/s/ Dr. Steve Barker  
**Superintendent or Designee**

10/10/2018  
**Date**