

RESOLUTION AGREEMENT
Complaint No. 06111239
Lafayette County School District

The Lafayette County School District (LCSD or District), Lafayette, Mississippi, voluntarily submits this Resolution Agreement (Agreement) to the U.S. Department of Education, Office for Civil Rights (OCR), Dallas Office. By this Agreement, the District commits to the following actions, consistent with the requirements of Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681, and its implementing regulations at 34 C.F.R. Part 106, to resolve the compliance concerns identified through OCR's investigation of the above-referenced complaint, specifically as they relate to the District's efforts to effectively accommodate the athletic interests and abilities of female students; the District's scheduling of games and practice time for student athletes; the District's provision of equipment and supplies to student athletes; student athletes' opportunity to receive coaching and the assignment and compensation of coaches; the District's provision of locker rooms, practice and competitive facilities to student athletes; and the District's provision of medical and training facilities to student athletes. 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 Title IX regulations at 34 C.F.R. § 106.41, which were at issue in this case. 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 the regulations implementing Title IX, at 34 C.F.R. § 106.41, which were at issue in 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 a minimum of sixty (60) calendar days to cure the alleged breach. If OCR has any objections to the documents, recommendations or other items required to be submitted for review and approval by OCR under this Agreement, OCR will notify the District of its objections promptly, no later than 60 calendar days after receiving the draft documents. This Agreement does not constitute an admission by the District that it discriminated or otherwise engaged in any wrongdoing. The District hereby voluntarily commits to the following:

I. EFFECTIVE ACCOMMODATION OF INTERESTS AND ABILITIES

The LCSD agrees to provide participation opportunities in its interscholastic athletics program for female and male students at the LCSD's high school and middle school that effectively accommodate the athletic interests and abilities of members of both sexes, consistent with the requirements of Title IX and its implementing regulations at 34 C.F.R. § 106.41(c)(1), and applicable OCR policies. To ensure compliance with Title IX, its implementing regulations, and OCR policy, the LCSD will either provide athletic participation opportunities at its high school and middle school in numbers that are substantially proportionate to each sex's enrollment in

each school, or demonstrate that the interests and abilities of female students are fully and effectively accommodated by the LCSD's current interscholastic athletics program.

II. DETERMINATION OF UNMET INTEREST AND ABILITY

In order to determine whether there is unmet interest and ability among female students in the LCSD's middle school and high school, the LCSD will take the following actions:

By March 1, 2015, the LCSD will conduct an objective assessment of the student body of the middle school and high school to determine the existence and/or scope of any unmet athletic interests of its female students. The assessment will also consider whether the interested students have the ability to sustain an interscholastic team, noting that they need not have the ability to sustain a successful or elite team, but only need to show that they have the potential to participate in team try-outs, practices and competitions and, with coaching, the potential to attain sufficient ability to participate at the particular level of competition (varsity, junior varsity, etc.) in which they have expressed interest. The assessment will be based on multiple indicators of interests and, if applicable, multiple indicators of abilities, and shall include the following:

1. A survey of female students at the LCSD middle school and high school. The survey shall seek information on female students' interest and ability to participate in sports currently offered and in sports not currently offered by the LCSD. A copy of the draft survey will be submitted to OCR for its review and approval before it is distributed to students.
2. A review of the results of recent surveys of students, if any, or other information collected from students using a method that is designed to fully and accurately assess unmet athletic interests and, if applicable, abilities in interscholastic sports among female students.
3. Identification of sports, squads, and levels of sports for female students that are not currently offered by the LCSD middle school and high school but are offered either by schools that compete within the league(s) in which the LCSD competes or by schools that are within the LCSD's normal competitive region and geographic area.
4. For the 2013-2014 school year, female students' rates of participation in club sports, interscholastic sports, and physical education courses that are offered in the LCSD's schools, and in community sports leagues, clubs or other youth programs offered in the LCSD's normal competitive region and geographic area.
5. For the last two school years, if applicable, a review of the number of female students who were cut from each middle school and high school team and the reasons they were cut, to assess whether any of those students had or have the ability to compete in that sport and whether sufficient numbers of students were cut to sustain another level in that sport (e.g., junior varsity).

6. A review of any requests (whether oral, written, formal or informal) made to School Board Members, LCSD administrators, coaches, or staff by or on behalf of female students to add a particular sport, squad, or level of sport, or to elevate an existing club sport to interscholastic sport status. This review may be limited to requests that were received during the 2011-2012, 2012-13 and 2013-14 school years.
7. Identification of all viable girls' teams that have been eliminated in the past ten school years.
8. For the last two school years, if applicable, a review of any assessments made by LCSD coaches or staff during tryouts, or observations of students participating in club or interscholastic competition offered by the LCSD or in community sports leagues, clubs or other youth programs offered in the LCSD's normal competitive region and geographic area, and other information reflecting the ability of female students to compete in a particular sport, prior participation in that sport or a similar sport at the middle or high school level or interscholastic club or community level, general athletic ability, participation in other high school interscholastic sports, the nature of the particular sport, and other relevant factors.
9. Any other information that demonstrates the athletic interests and, if applicable, abilities of the female students in the LCSD's high school and middle school.

REPORTING REQUIREMENTS – SECTION II

To demonstrate its compliance with the terms of Section II of this Agreement, the LCSD will submit the following information to OCR:

1. By December 15, 2014, a copy of the draft survey referenced in Section II.1., above, for OCR's review and approval. OCR will respond no later than 60 calendar days after receiving the draft documents.
2. By December 15, 2014, a complete description of the planned methodology to conduct the survey, including how the survey will be distributed, the number of surveys to be distributed, the grade levels of students who will receive the surveys, any planned follow-up to the initial distribution of the survey, the names and contact information for the individual(s) who will evaluate the responses to the surveys, and the protocol for retaining a copy of any notes or other documents compiled during the review of the surveys.
3. By May 15, 2015, a detailed report about the assessment conducted pursuant to Section II of this Agreement for the middle school and high school. The report will include, at a minimum, the following information:
 - a. A copy of the results of the survey referenced in Section II.1., above, including but not limited to the number of students, by sport, who indicated an interest in each sport, a complete description of the methodology used to conduct the survey,

including how the survey was distributed, the number of surveys distributed and the number of responses, the grade levels of students who received the surveys, any follow-up to the initial distribution of the survey, the names and contact information for the individual(s) who evaluated the responses to the surveys, and a copy of any notes or other documents compiled during the review of the surveys.

- b. An analysis of the results of any other recent surveys of students, if any, or other information collected from students using a method that is designed to fully and accurately assess unmet athletic interests and, if applicable, abilities in interscholastic sports among female students.
- c. A summary of sports, squads, and levels of sports for female students that are not currently offered by the LCSD middle school and high school but are offered either by schools that compete within the league(s) in which the LCSD competes or by schools that are within the LCSD's normal competitive region and geographic area.
- d. For the last two school years, for the middle school and high school, rates of participation by female students in:
 - 1) Interscholastic sports;
 - 2) Club sports;
 - 3) Physical education courses; and
 - 4) Community and youth sports leagues or clubs in the local Oxford, Mississippi, area.
- e. If applicable, a summary of the number of female students who were cut from each middle school and high school team and the reasons they were cut.
- f. A copy of any written requests and a summary of any non-written requests made by or on behalf of female students to add a particular sport, squad, or level of sport, or to elevate an existing club sport to interscholastic sport status.
- g. For the last two school years, a summary of any assessments made during tryouts, or other information reflecting the ability of female students to compete in a particular sport, prior participation in that sport or a similar sport at the middle or high school level or club or community level, general athletic ability, participation in other high school interscholastic sports, the nature of the particular sport, and other relevant factors.
- h. A description of any team(s) that was/were eliminated by the LCSD at any high school during the past ten school years, including the number of participants who were on the team in the year it was eliminated and the reason for the team's elimination.

- i. Any other information that was considered by the LCSD as part of its assessment of whether it is fully and effectively accommodating the athletic interests and abilities of female students in its high schools.

III. ACTIONS TO INCREASE ATHLETIC OPPORTUNITIES

If through the above-described assessment, the LCSD identifies a sport or sports in which there is sufficient but unmet interest and, if applicable, ability of female students to participate at the interscholastic level at the high school or middle school, the LCSD will add athletics opportunities as described below at the high school/middle school until such time as either (1) the high school/middle school is fully and effectively accommodating the expressed interests and abilities of female students (i.e., there remains no unmet interest and ability); or (2) the participation rate for female students in the high school's/middle school's interscholastic athletics program is substantially proportionate to their rate of enrollment at the high school/middle school.

For purposes of this provision, “sufficient interest” is defined as the minimum number of athletes needed to support a team. For “sufficient ability,” it is sufficient that interested students and admitted students have the potential to sustain an interscholastic team and students will not be required to demonstrate that they have sufficient ability in a new sport or team if students participating in existing sports or teams are not required to demonstrate through try-outs or some other process that they possess sufficient ability to participate in the specific sport or at the particular level of competition (varsity, junior varsity, etc.) in which they have expressed interest.

In providing additional athletic opportunities for female students to either accommodate their expressed interests and abilities or until their rate of participation is substantially proportionate to their rate of enrollment at the LCSD middle school and high school, the LCSD shall do the following:

1. Sports Currently Offered:

- a. The LCSD will determine, for sports that are currently offered as interscholastic sports at the middle school and high school, whether there is a sufficient number of female students with the interest and, if applicable, ability to support the creation of additional levels of competition (junior varsity, sophomore, etc.) or multiple squads at the same level of competition, and sufficient competition within the high school's/middle school's normal competitive region, to support additional levels of competition or multiple squads at the same level of competition in those sports. If so, the LCSD will add additional levels of competition or squads at the same or a lower level of competition at the high school/middle school in those sports by the next competitive season consistent with the above determination.
- b. In order to increase the competitive participation opportunities for female students, the LCSD will consider expanding the squad sizes for interscholastic sports currently offered at the high school/middle school, consistent with the nature of each sport and

the level of interest in each sport. The LCSD will increase the size of each squad where determined to be appropriate. If necessary, the LCSD will provide sufficient coaching staff to support the addition of new athletes to any given squad and take any other steps necessary to ensure that the new athletes on each expanded squad are provided meaningful opportunities to participate in interscholastic athletics.

2. Sports Not Currently Offered:

The LCSD will determine whether there is a sufficient number of female middle school and high school students with sufficient interest and, if applicable, ability to support the addition of a team or multiple teams (varsity, junior varsity, sophomore, etc.), in sports not currently offered by the middle school and high school as interscholastic sports, and whether there is sufficient competition within that school's normal competitive region and geographic area for those teams/sports. If so, the LCSD will add a team or multiple teams in those sports at the relevant school(s) by the next competitive season.

3. Response to Developing Interests and Abilities:

For any sport that is not currently offered by the LCSD high school/middle school where there is a sufficient number of female students who have sufficient interest and, if applicable, ability in that sport, but where the LCSD determines that there is not sufficient competition within the school's normal competitive region, the LCSD will take ongoing steps to develop students' interest and ability. These steps may include establishing club sports, exploring the feasibility of establishing competition in the District's normal competitive region and geographic area, and elevating such sports to interscholastic status when competition becomes available.

OCR has made clear to the LCSD and the LCSD understands that OCR does not require or encourage the elimination of any LCSD athletic teams and that it seeks action from the LCSD that does not involve the elimination of athletic opportunities, because nothing in Title IX or the three-part test requires an institution to cut teams or reduce opportunities for students who are participating in interscholastic athletics in order to comply with the provisions of Title IX relating to the effective accommodation of the interests and abilities of male and female students.

4. Additional Interscholastic Opportunities:

To the extent that the LCSD adds any sports or additional levels of teams at its middle school and high school, the LCSD will provide those team(s) in a manner comparable to other interscholastic teams, with sufficient funds in their budgets to cover expenses that include, but are not limited to: coaches, equipment and supplies, travel funds, and publicity and support services. The District will also publicize any new sports or additional levels of teams through written notices, verbal announcements, and postings on the LCSD's website.

REPORTING REQUIREMENTS – SECTION III

By July 1, 2015, if the LCSD was obligated to offer additional athletic opportunities pursuant to Section III of this Agreement, the LCSD will provide OCR with a detailed report that reflects the steps taken by the LCSD pursuant to Sections III.1-4 of this Agreement, to create new opportunities for female students as the underrepresented sex. This report will detail the timetable for the addition of new sports, levels of sports or newly-created club and/or other opportunities added pursuant to this Agreement. It will also describe how the creation of additional athletic opportunities taken pursuant to this Agreement will either (1) effectively accommodate the expressed interests and abilities of female students (*i.e.*, there remains no unmet interest and ability); or (2) ensure that female students' participation rates in the LCSD high school/middle school interscholastic athletics programs is substantially proportionate to female students' rate of enrollment at each such school.

1. By July 1, 2015, if the LCSD's assessment demonstrates that it is fully and effectively accommodating the athletic interests and abilities of its female middle school and high school students, the LCSD will submit information detailing its determination of the same.
2. By November 30 of each school year covered by this Agreement (2014-2015, 2015-2016, and 2016-2017), the LCSD will provide OCR with a copy of the squad list for each team at the LCSD middle school and high school.
3. By November 30 of each school year covered by this Agreement (2014-2015, 2015-2016, and 2016-2017), the District will provide information demonstrating the breakdown/enrollment by sex at the LCSD middle school and high school.
4. By November 30 of each school year covered by this Agreement (2014-2015, 2015-2016, and 2016-2017), the LCSD will provide information regarding any increases to the size of its squads, as described by Section III.1(b), above.

IV. ADDITIONAL COMMITMENTS TO IMPROVE THE ATHLETIC OPPORTUNITIES FOR THE UNDERREPRESENTED SEX

1. The LCSD will develop a process or procedure for students or other interested parties, such as coaches or parents, to use in requesting the addition of new sports or levels of sports at the LCSD's middle school and high school. The procedure will be written and notice of it will be published in the Student Handbook, and the individual responsible for responding to any requests will be identified by name and contact information. This information will also be displayed on the LCSD's website (athletics page).
2. At the beginning of each school year, the LCSD middle school and high school will provide written notice to coaches, physical education teachers, guidance counselors, and principals, of all sports offered at that specific school.

3. At the beginning of each school year, the LCSD middle school and high school will provide a written description of all sports offerings at that specific school to all of its students. The written descriptions will be distributed to the students in their physical education classes. This information will also be posted on the LCSD's website (athletics page).
4. The LCSD will maintain the interscholastic athletics squad lists, which shall reflect the participation numbers for each sport, by sex, as of each team's first competitive event. These records will not be destroyed or otherwise altered so that they can be submitted to OCR consistent with the terms of this Agreement.

REPORTING REQUIREMENTS – SECTION IV

1. By July 15, 2015, the LCSD will submit to OCR a copy of its procedure for requesting new sports, as required by Section IV.1, above, and a link to the location on its webpage where the revised procedure is located.
2. By July 15, 2015, the LCSD will provide OCR with a copy of the notices provided to coaches and students, as required by Section IV.2 and 3, above, and a link to the location on its webpage where the notices are located.

V. THE PROVISION OF EQUIPMENT AND SUPPLIES

The LCSD agrees to provide equivalent athletic opportunities to participants of both sexes in its athletics program with respect to the provision of equipment and supplies, as required by Title IX and its implementing regulations at 34 C.F.R. § 106.41(c)(2), and OCR policy. In this regard, the LCSD will assess its compliance with the requirements of this program component at its middle school and high school and then, with OCR's assistance, develop and implement a plan to resolve any identified compliance concerns to ensure the District's provision of equipment and supplies is equitable for both sexes in its interscholastic athletics program. The LCSD's assessment of its compliance with this program component will include consideration of input from student athletes and coaches.

1. By December 15, 2014, the LCSD will develop for OCR's review and approval policies and procedures designed to ensure the equivalent provision of equipment and supplies to the LCSD boys' and girls' athletic teams at the middle school and high school. The LCSD will implement the OCR-approved policies and procedures within 60 days following OCR's approval.
2. By February 1, 2015, the LCSD will conduct a comprehensive assessment of all equipment and supplies assigned to the boys' and girls' LCSD athletic teams at the middle school and high school to ensure the equivalent provision of equipment and supplies. The assessment will be documented in a report and shall include information about the LCSD's athletics program as it existed during the 2010-2011 and 2013-2014 school years. The report shall include, at a minimum, a detailed listing and evaluation of the following:

- a. All equipment and supplies provided to each athletic team;
 - b. Quality and availability of all of the equipment and supplies provided to each athletic team;
 - c. The source of funding for each (to include booster club funding and any other private donations) athletic team’s equipment and supplies;
 - d. Whether the equipment supplied to all teams is within that sport’s “regulation;”
 - e. The number and duties of equipment/student managers for each athletic team;
 - f. Laundry services provided to each team; and
 - g. An explanation of the quantity and quality of storage facilities for each athletic team.
3. Within 60 days following OCR’s approval of its assessment report, if the LCSD determines that the equipment and supplies currently assigned to the boys’ and girls’ athletic teams are not comparable, the LCSD will develop and submit to OCR for review and approval a plan to ensure that female and male athletes are provided with equivalent equipment and supplies. The plan will include a description of specific action steps, timelines, and revision of LCSD policies, procedures, and practices to ensure the provision of equal athletic opportunity to participants of both sexes with respect to the provision of equipment and supplies.
 4. Within 30 days following OCR’s approval of its proposed plan to ensure that female and male athletes are provided with equivalent equipment and supplies, the LCSD will begin implementation of the plan.
 5. Beginning on October 1, 2014, the District will note in its athletic budget whether each expenditure, including expenditures for the purchase and maintenance of equipment and supplies, are designated for the boys’ athletics program or for the girls’ athletics program.

REPORTING REQUIREMENTS – SECTION V

1. By December 15, 2014, the LCSD will submit to OCR for review and approval a copy of the policies and procedures designed to ensure the equivalent provision of equipment and supplies to the LCSD boys’ and girls’ athletic teams at the middle school and high school. OCR will respond no later than 60 calendar days after receiving the draft documents.
2. Within 14 days following its implementation of the OCR-approved policies and procedures, the LCSD will submit to OCR information indicating that the policies and procedures have been implemented, including, but not limited to, documentation showing that the policies and procedures have been published and communicated to all relevant students, staff members, and administrators.
3. By March 15, 2015, the LCSD will submit to OCR for review and approval a report of its assessment of the provision of equipment and supplies in its interscholastic athletics

program at the middle school and high school as outlined in Section V.2 of this Agreement. OCR will respond no later than 60 calendar days after receiving the draft documents.

4. By August 1, 2015, and by the same date thereafter in 2016 and 2017, the LCSD will, if applicable, provide a report to OCR addressing the implementation of its plan to provide equivalent equipment and supplies to all female and male LCSD athletes. The report should include appropriate documentation to demonstrate that the plan is being implemented.
5. By August 1, 2015, and by the same date thereafter in 2016 and 2017, the LCSD will provide to OCR a copy of its athletic budget for the preceding school year listing each expenditure by the sex of the athletic team(s) benefitting from the expenditure.

VI. SCHEDULING OF GAMES AND PRACTICE TIME

The LCSD agrees to provide equal athletic opportunities to participants of both sexes in its interscholastic athletics program with respect to the scheduling of games and practice time, as required by Title IX and its implementing regulations at 34 C.F.R. § 106.41(c)(3), and OCR policy. In this regard, the LCSD will assess its compliance with the requirements of this program component at its middle school and high school and then, with OCR's assistance, develop and implement a plan to resolve any identified compliance concerns to ensure the provision of equal athletic opportunity to participants of both sexes in its interscholastic athletics program. The LCSD's assessment of its compliance with this program component will include consideration of input from student athletes and coaches.

1. By December 15, 2014, the LCSD will develop for OCR's review and approval policies and procedures designed to ensure that its scheduling of games and practice time is equivalent or equivalent in effect for the LCSD boys' and girls' athletic teams at the middle school and high school. The LCSD will implement the OCR-approved policies and procedures within 60 days following OCR's approval.
2. By February 1, 2015, the LCSD will complete a comprehensive assessment of the scheduling of games and practice time in its interscholastic athletics program at its middle school and high school to ensure that participants of both sexes benefit from the scheduling of games and practice time in a manner that is equivalent or equivalent in effect. The assessment will be documented in a report and shall include information about the LCSD's athletics program as it existed during the 2010-2011 school year and during the 2013-2014 school year. The report shall also include, at a minimum, an assessment of the following factors:
 - a. Number of competitive events per sport;
 - b. Number and length of practice opportunities;
 - c. Time of day competitive events are scheduled;

- d. Time of day practice opportunities are scheduled, and
 - e. Opportunities to engage in available pre-season and post-season competition.
3. Within 60 days following OCR's approval of its assessment report, the LCSD will, if applicable, submit to OCR for its review and approval a plan to ensure that male and female student athletes are provided benefits and services in the scheduling component that are equivalent or equivalent in effect. The plan will include a description of specific action steps, timelines, and revision of LCSD policies, procedures, and practices to ensure the provision of equal athletic opportunity to participants of both sexes with respect to the scheduling of games and practice time.
 4. Within 30 days following OCR's approval of its proposed plan to ensure that male and female student athletes are provided equivalent benefits and services in the scheduling component, the LCSD will begin implementation of the plan.

REPORTING REQUIREMENTS – SECTION VI

1. By December 15, 2014, the LCSD will submit to OCR for review and approval a copy of the policies and procedures designed to ensure that its scheduling of games and practice time is equivalent or equivalent in effect for the LCSD boys' and girls' athletic teams at the middle school and high school. OCR will respond no later than 60 calendar days after receiving the draft documents.
2. Within 14 days following its implementation of the OCR-approved policies and procedures, the LCSD will submit to OCR information indicating that the policies and procedures have been implemented, including, but not limited to, documentation showing that the policies and procedures have been published and communicated to all relevant students, staff members, and administrators.
3. By February 1, 2015, the LCSD will submit to OCR for review and approval a report of its assessment of the scheduling of games and practice time in its interscholastic athletics program at the middle school and high school as outlined in Section VI.2 of this Agreement. OCR will respond no later than 60 calendar days after receiving the draft documents.
4. By August 1, 2015, and by the same date thereafter in 2016 and 2017, the LCSD will, if applicable, provide a report to OCR addressing the implementation of its plan to provide equivalent benefits and services in the scheduling component to all female and male LCSD athletes. The report should include appropriate documentation to demonstrate that the plan is being implemented.

VII. OPPORTUNITY TO RECEIVE COACHING AND ASSIGNMENT AND COMPENSATION OF COACHES

The LCSD agrees to provide equal athletic opportunities to participants of both sexes in its interscholastic athletics program with respect to the opportunity to receive coaching and the

assignment and compensation of coaches, as required by Title IX and its implementing regulations at 34 C.F.R. § 106.41(c)(5) and (6), and OCR policy. In this regard, the LCSD will assess its compliance with the requirements of this program component at its high school and middle school and then, with OCR's assistance, develop and implement a plan to resolve any identified compliance concerns to ensure the provision of equal athletic opportunity to participants of both sexes in its interscholastic athletics program. The LCSD's assessment of its compliance with this program component will include consideration of input from student athletes and coaches.

1. By December 15, 2014, the LCSD will develop for OCR's review and approval policies and procedures designed to ensure that equal athletic opportunities are provided to participants of both sexes in its interscholastic athletics program with respect to the opportunity to receive coaching and the assignment and compensation of coaches at the middle school and high school. The LCSD will implement the OCR-approved policies and procedures within 60 days following OCR's approval.
2. By February 1, 2015, the LCSD will complete a comprehensive assessment of the availability, assignment, and compensation of coaches in its interscholastic athletics program at its middle school and high school to ensure that participants of both sexes are provided coaching benefits that are equivalent or equivalent in effect. The assessment will be documented in a report and shall include information about the LCSD's athletics program as it existed during the 2010-2011 school year and during the 2013-2014 school year. The report shall also include, at a minimum, an assessment of the following factors:
 - a. The number of participants for each team at the middle school and high school in the LCSD.
 - b. A review of the relative availability of full-time coaches, part-time coaches, and assistant coaches at the middle school and high school in the LCSD.
 - c. A review of the assignment of coaches, including their respective training, experience, and other professional qualifications, and professional standing, at the middle school and high school in the LCSD.
 - d. A review of the compensation of coaches, including their rate of compensation (per sport, per season), duration of contracts, conditions relating to contract renewal, experience, nature of coaching duties performed, working conditions, and other terms and conditions of employment, at the middle school and high school in the LCSD.
 - e. A review of any LCSD or individual school policies, procedures, and practices that impact the LCSD's athletics program with regard to the opportunity to receive coaching and the assignment and compensation of coaches.
 - f. A description of any differences related to the availability, assignment, and compensation of coaches between male and female participants in the LCSD's interscholastic athletics program for all of the factors indicated in Section VII.2(a)-

(e), above, for the 2010-2011 and 2013-2014 school years, including, but not limited to, coaching reassignments, new hires, and/or other changes in the opportunity to receive coaching and the assignment and compensation of coaches.

3. Within 60 days following OCR's approval of its assessment report, the LCSD will, if applicable, submit to OCR for its review and approval a plan to ensure that male and female student athletes are provided equivalent benefits and services in the coaching component. The plan will include a description of specific action steps, timelines, and revision of LCSD policies, procedures, and practices to ensure the provision of equal athletic opportunity to participants of both sexes in the assignment, availability, and compensation of coaches.
4. Within 30 days following OCR's approval of its proposed plan to ensure that male and female student athletes are provided equivalent benefits and services in the coaching component, the LCSD will begin implementation of the plan.

REPORTING REQUIREMENTS – SECTION VII

1. By December 15, 2014, the LCSD will submit to OCR for review and approval a copy of the policies and procedures designed to ensure that equal athletic opportunities are provided to participants of both sexes in its interscholastic athletics program with respect to the opportunity to receive coaching and the assignment and compensation of coaches at the middle school and high school. OCR will respond no later than 60 calendar days after receiving the draft documents.
2. Within 14 days following its implementation of the OCR-approved policies and procedures, the LCSD will submit to OCR information indicating that the policies and procedures have been implemented, including, but not limited to, documentation showing that the policies and procedures have been published and communicated to all relevant students, staff members, and administrators.
3. By February 1, 2015, the LCSD will submit to OCR for review and approval a report of its assessment of the availability, assignment, and compensation of coaches in its interscholastic athletics program as outlined in Section VII.2 of this Agreement. OCR will respond no later than 60 calendar days after receiving the draft documents.
4. By August 1, 2015, and by the same date thereafter in 2016 and 2017, the LCSD will, if applicable, provide a report to OCR addressing the implementation of its plan to provide equivalent benefits and services in the coaching component to all female and male LCSD athletes. The report should include appropriate documentation to demonstrate that the plan is being implemented.

VIII. PROVISION OF LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES

The LCSD agrees to provide equal athletic opportunities to participants of both sexes in its interscholastic athletics program with respect to the provision of locker rooms, practice and competitive facilities, as required by Title IX and its implementing regulations at 34 C.F.R. § 106.41(c)(7), and OCR policy. In this regard, the LCSD will assess its compliance with the requirements of this program component at its middle school and high school and then, with OCR's assistance, develop and implement a plan to resolve any identified compliance concerns to ensure the provision of equal athletic opportunity to participants of both sexes in its interscholastic athletics program. The LCSD's assessment of its compliance with this program component will include consideration of input from student athletes and coaches.

1. By December 15, 2014, the LCSD will develop for OCR's review and approval policies and procedures designed to ensure the equivalent provision of locker rooms and practice and competitive facilities to the LCSD boys' and girls' athletic teams at the middle school and high school. The LCSD will implement the OCR-approved policies and procedures within 60 days following OCR's approval.
2. By March 1, 2015, the LCSD will complete a comprehensive assessment of all locker rooms, practice fields and facilities, and competitive fields and facilities assigned to the boys' and girls' LCSD athletic teams to ensure the equivalent provision of locker rooms, practice and competitive facilities. The assessment will be documented in a report and shall include information about the LCSD's athletics program as it existed during the 2010-2011 school year and during the 2013-2014 school year. The report shall include, at a minimum, an evaluation of the following:
 - a. Quality and availability of the facilities provided for practice and competitive events for each athletic team at the middle school and high school;
 - b. Exclusivity of use of facilities provided for practice and competitive events;
 - c. Availability of locker rooms for each LCSD athletic team at the middle school and high school;
 - d. Quality of locker rooms for each LCSD athletic team at the middle school and high school;
 - e. Maintenance of practice and competitive facilities; and
 - f. Preparation of facilities for practice and competitive events.

The assessment of the above-listed factors shall include the following: a list of all locker rooms, practice fields and facilities, and competitive fields and facilities, including proximity of locker rooms to the practice and competitive facilities, quality of each facility (including, but not limited to, any identified issues related to field drainage, field lighting, etc.), amenities for each

locker room (showers, laundry service, available trainers, accommodations for visiting teams), exclusive use of locker rooms, amenities for each practice and competitive field (concession facilities, public address systems, electronic scoreboards, seating at each field, maintenance of each facility, preparation of each practice and competitive field), the age of each facility, whether it is on or off-campus, and whether certain teams or programs have exclusive use of the facility, including a schedule showing when facilities are used for practice and competition and how long the locker rooms are assigned for use by each LCSD athletic team at the middle school and high school.

3. Within 60 days following OCR's approval of its assessment report, the LCSD will, if applicable, submit to OCR for its review and approval a plan to ensure that male and female student athletes are provided equivalent benefits and opportunities with respect to locker rooms, practice fields and facilities, and competitive fields and facilities. The plan will include a description of specific action steps, timelines, and revision of LCSD policies, procedures, and practices to ensure the provision of equal athletic opportunity to participants of both sexes with respect to locker rooms, practice fields and facilities, and competitive fields and facilities.
4. Within 30 days following OCR's approval of its proposed plan to ensure that male and female student athletes are provided equivalent benefits and services in the locker rooms, practice, and competitive facilities component, the LCSD will begin implementation of the plan.

REPORTING REQUIREMENTS – SECTION VIII

1. By December 15, 2014, the LCSD will submit to OCR for review and approval a copy of its policies and procedures designed to ensure the equivalent provision of locker rooms, and practice and competitive facilities to the boys' and girls' athletic teams at the middle school and high school. OCR will respond no later than 60 calendar days after receiving the draft documents.
2. Within 14 days following its implementation of the OCR-approved policies and procedures, the LCSD will submit to OCR information indicating that the policies and procedures have been implemented, including, but not limited to, documentation showing that the policies and procedures have been published and communicated to all relevant students, staff members, and administrators.
3. By March 1, 2015, the LCSD will submit to OCR for review and approval a report of its assessment of the provision of locker rooms and practice and competitive facilities in its interscholastic athletics program as outlined in Section VIII.2 of this Agreement. OCR will respond no later than 60 calendar days after receiving the draft documents.
4. By August 1, 2015, and by the same date thereafter in 2016 and 2017, the LCSD will, if applicable, provide a report to OCR addressing the implementation of its plan to provide equivalent benefits and services in the locker rooms, practice, and competitive facilities

component to all female and male LCSD athletes. The report should include appropriate documentation to demonstrate that the plan is being implemented.

IX. PROVISION OF MEDICAL AND TRAINING FACILITIES AND SERVICES

The LCSD agrees to provide equal athletic opportunities to participants of both sexes in its interscholastic athletics program with respect to the provision of medical and training facilities and services, as required by Title IX and its implementing regulations at 34 C.F.R. § 106.41(c)(8), and OCR policy. In this regard, the LCSD will assess its compliance with the requirements of this program component and then, with OCR's assistance, develop and implement a plan to resolve any identified compliance concerns to ensure the provision of equal athletic opportunity to participants of both sexes in its interscholastic athletics program. The LCSD's assessment of its compliance with this program component will include consideration of input from student athletes and coaches.

1. By December 15, 2014, the LCSD will develop for OCR's review and approval policies and procedures designed to ensure the equivalent provision of medical and training facilities and services to the LCSD boys' and girls' athletic teams at the middle school and high school. The LCSD will implement the OCR-approved policies and procedures within 60 days following OCR's approval.
2. By March 1, 2015, the LCSD will complete an assessment of the provision of medical and training facilities and services in its interscholastic athletics program to ensure that participants of both sexes are provided medical and training benefits and services that are equivalent or equivalent in effect. The assessment will be documented in a report and shall include information about the LCSD's athletics program as it existed during the 2010-2011 school year and during the 2013-2014 school year. The report shall include, at a minimum, an evaluation of the following:
 - a. The availability of the following to participants of both sexes at the LCSD middle school and high school: medical personnel and assistance; health, accident and injury insurance coverage; weight training facilities (of approximately equivalent quality); conditioning facilities (of approximately equivalent quality); and, athletic trainers (with approximately equivalent qualifications);
 - b. A review of any LCSD or individual school policies, procedures, and practices that impact the LCSD's athletics program with regard to the provision of medical and training facilities and services; and
 - c. A description of any differences in the facilities and services provided to participants of both sexes in the LCSD's interscholastic athletics program for all of the factors indicated in Section IX.2(a)-(b), above, for the 2010-2011 and 2013-2014 school years.
3. Within 60 days following OCR's approval of its assessment report, the LCSD will, if applicable, submit to OCR for its review and approval a plan to ensure that male and

female student athletes are provided equivalent benefits and opportunities with respect to medical and training facilities and services. The plan will include a description of specific action steps, timelines, and revision of LCSD policies, procedures, and practices to ensure the provision of equal athletic opportunity to participants of both sexes with respect to medical and training facilities and services.

4. Within 30 days following OCR's approval of its proposed plan to ensure that male and female student athletes are provided equivalent benefits and services in the medical and training facilities and services component, the LCSD will begin implementation of the plan.

REPORTING REQUIREMENTS – SECTION IX

1. By December 15, 2014, the LCSD will submit to OCR for review and approval a copy of its policies and procedures designed to ensure the equivalent provision of medical and training facilities and services to the boys' and girls' athletic teams at the middle school and high school. OCR will respond no later than 60 calendar days after receiving the draft documents.
2. Within 14 days following its implementation of the OCR-approved policies and procedures, the LCSD will submit to OCR information indicating that the policies and procedures have been implemented, including, but not limited to, documentation showing that the policies and procedures have been published and communicated to all relevant students, staff members, and administrators.
3. By March 1, 2015, the LCSD will submit to OCR for review and approval a report of its assessment of the provision of medical and training facilities and services in its interscholastic athletics program as outlined in Section IX.2 of this Agreement. OCR will respond no later than 60 calendar days after receiving the draft documents.
4. By August 1, 2015, and by the same date thereafter in 2016 and 2017, the LCSD will, if applicable, provide a report to OCR addressing the implementation of its plan to provide equivalent benefits and services in the medical and training facilities and services component to all female and male LCSD athletes. The report should include appropriate documentation to demonstrate that the plan is being implemented.

X. TITLE IX COORDINATOR

1. The LCSD will designate a Title IX coordinator to coordinate its efforts to comply with and carry out its responsibilities under Title IX. The coordinator's responsibilities will include investigating complaints communicated to the recipient alleging noncompliance with Title IX, as required by 34 C.F.R. § 106.8(a), as well as conducting relevant training regarding Title IX issues.

REPORTING REQUIREMENT – SECTION X

1. By November 1, 2014, the LCSD will provide to OCR written verification that it has designated a Title IX coordinator and has notified all students and employees of the name, address, and telephone number of the designated coordinator. The LCSD will provide notice of the designation on its website and other forms of communication, such as student and employee handbooks, pursuant to 34 C.F.R. § 106.8(a).

XI. TITLE IX GRIEVANCE PROCEDURES

1. By November 28, 2014, the LCSD will submit to OCR for its review and approval draft Title IX grievance procedures to address complaints of sex discrimination (including sexual harassment and sexual assault), as required by Title IX's implementing regulations at 34 C.F.R. § 106.8(b). OCR will respond no later than 60 calendar days after receiving the draft procedures. These grievance procedures may also address other types of discrimination based on classifications protected by law or LCSD board policy. The LCSD will ensure that these procedures provide for the prompt and equitable resolution of complaints alleging sex discrimination and will include, at a minimum, the following:
 - a. a notice that the procedures apply to complaints of sex discrimination (including sexual harassment and sexual assault) raised by employees, students, or third parties against employees, students, or third parties;
 - b. an explanation of how to file a complaint pursuant to the procedures;
 - c. the name or title, office address, and telephone number of the individual with whom to file a complaint;
 - d. definitions and examples of what types of actions may constitute sex discrimination (including sexual harassment and sexual assault);
 - e. provide for the adequate, reliable, and impartial investigation of all complaints, including the opportunity for the parties to present witnesses and other evidence;
 - f. provide that the preponderance of the evidence standard will be used for investigating allegations of sexual harassment or violence;
 - g. timeframes for the major stages of the investigation;
 - h. written notification to the parties of the outcome of the investigation;
 - i. an assurance that the LCSD will keep the complaint and investigation confidential to the extent possible;
 - j. an assurance that the LCSD will take steps to prevent recurrence of any discrimination, with examples of the range of possible disciplinary sanctions, and to remedy the discriminatory effects on the victim(s) and others, with examples of the types of remedies available to victims;
 - k. a statement that Title IX prohibits retaliation against any individual who files a complaint under Title IX or participates in a complaint investigation.

REPORTING REQUIREMENTS – SECTION XI

1. Within 30 calendar days after receiving the OCR-approved grievance procedures, the LCSD will adopt and implement the procedures and will disseminate to all faculty, staff,

and parents/students written notice regarding the grievance procedures. The LCSD, at a minimum, will make this notification through the LCSD’s website, electronic mail messages to faculty, staff, and parents/students, and the following regularly issued publications: Student Handbook, Staff Handbook, as well as by any additional means of notification that the LCSD deems effective to ensure that the information is widely disseminated.

2. Within 30 calendar days after the completion of the actions required by Reporting Requirement 1, above, the LCSD will provide OCR with documentation demonstrating that it has implemented the actions, including copies of the written and electronic notices issued to faculty, staff, and parents/students regarding the Title IX procedures and a description of how the notices were distributed; copies of its revised publications; and a link to the webpage where the Title IX procedures are located.

XII. TRAINING FOR TITLE IX COORDINATOR(S), COUNSELORS, AND OTHER LCSD PERSONNEL

1. Within 45 calendar days after receiving OCR’s approval of the grievance procedures described in Section XI above, the LCSD will submit to OCR for review and approval proposed training to be provided to its Title IX Coordinators, any other coordinators, school counselors, and any administrators who will be directly involved in receiving, processing, investigating, and/or resolving complaints of sex discrimination (including sexual harassment and sexual assault), or who will otherwise coordinate the LCSD’s Title IX compliance, regarding the LCSD’s revised Title IX grievance procedures. OCR will respond no later than 60 calendar days after receiving the proposed training. The proposed training will also explain the different types of discrimination prohibited by Title IX, and will outline the applicable legal standard for conducting investigations involving the different types of Title IX discrimination complaints.

REPORTING REQUIREMENT – SECTION XII

1. Within 30 calendar days after OCR approves the proposed training, with or without modifications, the LCSD will conduct the training program in one or more sessions. Within 15 calendar days after the training has been conducted, the LCSD will provide OCR with documentation demonstrating that it has completed the training for appropriate LCSD staff, including the date(s) of the training, the name(s) and title(s) of the trainer(s), a copy of any materials used or distributed during the training, and a sign-in sheet with the names and titles of the LCSD staff who attended the training.

Signed:

Mr. Adam Pugh, Superintendent
Superintendent
Lafayette County Public School District

Date