November 17, 2017

Dr. Robin Battershell, Superintendent
Temple Independent School District
200 N. 23rd Street,
Temple, TX 76504

RE: OCR Compliance Review Case No. 06115003
Temple Independent School District

Dear Superintendent Battershell:

This is to advise you of the resolution of the above-referenced compliance review that was initiated at the Temple Independent School District (TISD or District) by the U.S. Department of Education, Office for Civil Rights (OCR), under Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d et seq., and its implementing regulation, 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, or national origin by recipients of Federal financial assistance from the Department. As a recipient of Federal financial assistance from the Department, the District is subject to Title VI.

OCR’s review was initiated to determine whether the District discriminates against African-American students on the basis of race by disciplining them more frequently and more harshly than other similarly-situated students, in violation of Title VI and its implementing regulation. Prior to the conclusion of OCR’s review, the District expressed an interest in voluntarily resolving this review and entered into an Agreement submitted to OCR on November 6, 2017 that commits the District to specific actions to address the issue under review. This letter summarizes the applicable legal standards, the information gathered during the review and how the review was resolved.

Legal Standards

The standards for determining compliance with Title VI are set forth in the regulation at 34 C.F.R. §100.3(a) and (b). The regulation, at 34 C.F.R. §100.3(a), states that no person shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving Federal financial assistance. Section 100.3(b)(1)(i)-(vi) further states that a recipient, under any program to which the regulation applies, may not, on the ground of race, color or national origin, deny an individual any service or benefit; provide any service or benefit to an individual which is different or provided in a different manner; subject an individual to segregation or separate
treatment in any matter related to receipt of any service or other benefit; restrict an individual in
the enjoyment of any benefits; treat an individual differently in determining whether he or she
satisfies any admission, enrollment, eligibility, or other requirement or condition to be provided
any service or other benefit; or, deny an individual an opportunity to participate or provide an
opportunity to participate that is different from that afforded others. The regulation, at 34 C.F.R.
§100.3(b)(2), also provides that a recipient may not utilize criteria or methods of administration
that have the effect of subjecting individuals to discrimination on the basis of race, color, or
national origin, or have the effect of defeating or substantially impairing accomplishment of the
objectives of the program with respect to individuals of a particular race, color, or national
origin.

Title VI protects students even if a school district contracts or arranges for entities, over which it
can exercise some control, to be responsible for aspects of a school’s student safety or student
discipline program. Schools cannot divest themselves of responsibility for the non-
discriminatory administration of school safety and student discipline by relying on school
resource officers, school district police officers, “contract” law enforcement companies, or other
contractors or law enforcement personnel over whom the school can exercise some control.

Disciplinary policies and practices can result in unlawful discrimination based on race in two
ways: first, if students are intentionally subject to different treatment on account of their race;
second, if a policy is neutral on its face but has a disproportionate and unjustified effect on
student(s) of a particular race, referred to as disparate impact.

A. Different Treatment

Title VI prohibits school districts from intentionally disciplining students differently based on
race. Enforcement of a rule or application in a discriminatory manner is prohibited intentional
discrimination. When similarly situated students of different races are disciplined differently for
the same offense, discrimination may be the only reasonable explanation for the different
treatment. Absent direct evidence that a district discriminates on the basis of race, OCR
generally applies a three-step disparate treatment analysis. First, OCR determines whether the
facts support a prima facie case of discrimination. A prima facie case exists if a preponderance
of the evidence indicates that a district treated one or more students of one race differently than
one or more similarly situated students of a different race. Second, if a prima facie case of
different treatment is established, OCR determines whether the district had a legitimate, non-
discriminatory reason for its action(s) that would rebut the prima facie case against it. Third, if
one or more legitimate, non-discriminatory reasons for the different treatment are identified,
OCR determines whether the district’s asserted reasons for its actions are pretext for race
discrimination. Ultimately, the weight of the evidence must support a finding that actual
discrimination occurred.

Intentional discrimination in the administration of student discipline can take many forms,
however, and can be proven even without the existence of a similarly situated student. For
example, a school’s adoption of a facially neutral policy with an invidious intent to target certain
races is prohibited intentional discrimination. Whether OCR finds a violation of Title VI will be
based on the facts and circumstances surrounding the particular discipline incident or series of
incidents.

B. Disparate Impact

Districts also violate Federal law when they evenhandedly implement facially neutral policies or practices that, although not adopted with the intent to discriminate, nonetheless have an unjustified effect of discriminating against students on the basis of race. In determining whether a facially neutral student discipline policy has an unlawful disparate impact on the basis of race, OCR engages in the following three-part inquiry:

1) Has the discipline policy resulted in an adverse impact on students of a particular race as compared with students of other races?
2) Is the discipline policy necessary to meet an important educational goal?
3) Are there comparably effective alternative policies or practices available that would meet the school’s stated educational goal with less of a burden or adverse impact on the disproportionately affected racial group, or is the school’s proffered justification a pretext for discrimination?

Overview of the District

The District, located in Temple, Texas, has fifteen campuses, including one early childhood center (Pre-K through K), eight elementary schools (grades K through 5), three middle schools (grades 6 through 8), one high school (grades 9 through 12), and two alternative education campuses.

Additionally, the District has access to a Juvenile Justice Alternative Education Program (JJAEP) with the Bell County juvenile board. According to the Bell County’s description of the JJAEP, the academic mission of the JJAEP is to enable students to perform at grade level, and for the purposes of accountability, a student enrolled in a JJAEP is reported as if the student was enrolled at the student's assigned campus in the student's regularly assigned education programs, including special education.

During the 2010-2011 school year, student enrollment in the District totaled 10,624. During the 2011-2012 school year, total student enrollment in the District increased slightly to 10,734. During the 2012-2013 school year, total student enrollment in the District decreased to 9,557. During the 2013-2014, 2014-2015 and 2015-2016 school years, total enrollment held relatively stable at 9,570 students, 9,604 students and 9,600 students, respectively. Over the course of these six school years reviewed by OCR, African-American students comprised 27 to 32 percent of the student population, White students comprised 24 to 31 percent, and students from all Other racial groups comprised 38 to 48 percent.

---

1 Students listed in the “Other” category include students classified as Hispanic, American Indian, Pacific Islander, and Asian.
District-Wide Discipline Statistics

OCR compared the percentage of African-American students enrolled and referred for discipline against the percentage of White students enrolled and referred for discipline in the District. For the 2010-2011 through 2012-2013 school years, OCR found that the percentage of discipline referrals against African-American students was greater than the percentage of the African-American students enrolled in the District. In contrast, OCR found that the percentage of discipline referrals against White students was not greater than the percentage of White students enrolled in the District.

During the 2010-2011 school year, the District had a total of 17,391 discipline referrals, which was comprised of 8,551 (49.2%) referrals of African-American students, 3,456 (19.9%) referrals of White students, and 5,384 (30.9%) referrals of other students. Although African-American students made up only 31.4 percent of the population, they received 49 percent of the discipline referrals.

During the 2011-2012 school year, the number of discipline referrals increased slightly to 17,988, which was comprised of 8,897 (49.5%) referrals of African-American students, 3,351 (18.6%) referrals of White students, and 5,740 (31.9%) referrals of other students. Although African-American students made up only 31.7% of the population, they received 49.5% of the discipline referrals.

During the 2012-2013 school year, the number of discipline referrals significantly decreased to 7,740. Anecdotal information obtained during teacher and administrator interviews indicates that the decrease in the number of referrals was due to the increased scrutiny of disciplinary referrals resulting from OCR’s compliance review. African-American students received 3,721 (48.1%) referrals, White students received 1,424 (18.4%) referrals, and other students received 2,595 (33.5%) referrals. Although African-American students made up only 30.3% of the population, they received 48% of the discipline referrals. As such, even when the District decreased the total number of referrals, African-American students continued to receive a disproportionate share of them.

<table>
<thead>
<tr>
<th></th>
<th>2010-2011</th>
<th>2011-2012</th>
<th>2012-2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of Total Enrollment</td>
<td>31.4%</td>
<td>31.7%</td>
<td>30.3%</td>
</tr>
<tr>
<td>% of Discipline Referrals</td>
<td>49.2%</td>
<td>49.5%</td>
<td>48%</td>
</tr>
</tbody>
</table>

For the 2013-2014 through 2015-2016 school years, OCR compared the percentage of African-American students enrolled and administered exclusionary discipline against the percentage of White students enrolled and administered exclusionary discipline in the District. OCR found that the percentage of exclusionary discipline actions administered against African-American
students was greater than the percentage of the African-American students enrolled in the District. In contrast, OCR found that the percentage of exclusionary discipline actions administered against White students disciplined was not greater than the percentage of White students enrolled in the District.

OCR obtained Public Education Information Management System (PEIMS) data from the Texas Education Agency (TEA), showing the District’s use of exclusionary discipline\(^2\) by race for the 2013-2014, 2014-2015 and 2015-2016 school years.\(^3\) During the 2013-2014 school year, exclusionary discipline actions in the District totaled 7,507, which consisted of 3,655 (48.7%) incidents of discipline administered against African-American students, 1,151 (15.3%) against White students, and 2,301 (36%) against Other students. During the 2014-2015 school year, exclusionary discipline actions in the District totaled 7,380, which consisted of 3,504 (47.5%) incidents of discipline administered against African-American students, 1,207 (16.4%) against White students, and 2,669 (36.1%) against Other students. During the 2015-2016 school year, exclusionary discipline actions in the District totaled 6,354, which consisted of 3065 (48.2%) incidents of discipline administered against African-American students, 984 (15.5%) against White students, and 2,305 (36.3%) against Other students.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>% of Total Enrollment</td>
<td>27.2%</td>
<td>27.3%</td>
<td>27.3%</td>
<td>26.3%</td>
<td>27.7%</td>
<td>24.6%</td>
</tr>
<tr>
<td>% of Exclusionary Discipline Actions</td>
<td>48.7%</td>
<td>15.3%</td>
<td>47.5%</td>
<td>16.4%</td>
<td>48.2%</td>
<td>15.5%</td>
</tr>
</tbody>
</table>

OCR conducted statistical analysis of the District’s discipline data and OCR found that, during each of the 2010-2011 through 2012-2013 school years, the number of referrals for African-American students was disproportionately higher than the number of referrals for White students to a statistically significant degree, and during each of the 2013-2014 through 2015-2016 school years, the number of exclusionary discipline actions for African-American students was disproportionately higher than the number of exclusionary discipline actions for White students to a statistically significant degree. Because OCR determined that there is a district-wide statistically significant disparity in the number of discipline referrals and exclusionary discipline actions against African-American students, OCR looked for evidence of different treatment and disparate impact by reviewing the District’s discipline policies, interviewing students and staff, and conducting reviews of individual discipline files.

---

\(^2\) Exclusionary discipline includes In School Suspension (ISS), Out of School Suspension (OSS), Disciplinary Alternative Education Program (DAEP) and JJAEP. However, the District reported no instances of JJAEP.

\(^3\) These numbers reflect all instances of exclusionary discipline, including multiple disciplinary actions that were applied against the same individual student.
Summary of Investigative Review

OCR reviewed information provided by the District regarding its student enrollment, discipline records, and discipline policies and procedures. OCR conducted onsite interviews of discipline administrators and several student groups at the elementary, middle, and high school levels, and utilized online interview questionnaires to obtain information from District teachers. OCR also conducted statistical analysis and reviewed disciplinary data reported through the TEA PEIMS and the U.S. Department of Education Civil Rights Data Collection (CRDC).

A. Discipline Policies and Procedures

OCR reviewed the District’s discipline policies and procedures and spoke with elementary, middle and high school principals about the District’s discipline practices. OCR learned that the District’s discipline policies and procedures have been modified in various respects over the past several years, as a result of changes in Texas law. The District’s discipline policy is located within the Student Code of Conduct (SCC). Because the latest school year of OCR’s compliance review was the 2015-2016 school year, OCR’s assessment of the District’s discipline policy is of the 2015-2016 SCC.

The SCC lists 108 specific categories of “Prohibited Conduct” and also includes the types of disciplinary sanctions that may be imposed for violations of the SCC. The SCC lists offenses that carry a penalty of mandatory expulsion or mandatory DAEP placement. The District administrators have discretion to select the sanction for all infractions that do not require mandatory expulsion or DAEP placement. Additionally, teachers and principals may impose campus or classroom rules in addition to those found in the SCC. These rules may be posted in classrooms or given to the student and may or may not also constitute violations of the SCC. The sanctions for violations of campus or classroom rules are discretionary.

The SCC also contains a list of 47 “discipline management techniques,” which may be used, alone or in combination, for misbehavior that violates the SCC or campus or classroom rules. These techniques range from oral correction and seating changes within the classroom to surveillance/escort and transfer to another class, to name a few.

Under the discipline policy, disciplinary action may include but is not limited to one or more of the following:

- **Teacher or administrator-assigned detention.** For minor infractions of the SCC or campus or classroom rules, teachers or administrators may detain students after school hours or during lunch on one or more days. Notice shall first be given to the student’s parent to inform him or her of the reason for the detention and permit arrangement for transportation.

- **In-school suspension (ISS).** For minor infractions of the SCC or campus or classroom rules, administrators may assign students to one or more days of ISS where students will complete assignments given to them by their regular teachers. Both the length of the assignment and restrictions on participation in school-sponsored or school-related extracurricular activities during the suspension are left to the discretion of the
administrator. If a student is placed in ISS for an extended period of time, the District will offer an opportunity for the student to complete courses in which he or she was enrolled at the time of placement before the beginning of the next school year (e.g., summer school, correspondence courses, or distance learning).

- **Out-of-school suspension (OSS).** The principal or other appropriate administrator may suspend a student for a maximum of three school days at one time if the student violates the SCC by engaging in any prohibited conduct. Both the length of the suspension and restrictions on participation in school-sponsored extracurricular activities are left to the discretion of the administrator.

- **Formal removal from class by the teacher.** A student who has been documented to repeatedly interfere with a teacher’s ability to communicate effectively with the students in the class or with the ability of the students to learn, or who behaves in a manner the teacher determines is so unruly, disruptive, or abusive that it seriously interferes with the teacher’s ability to communicate effectively with the students or with the ability of the other students to learn will be formally removed from the teacher’s classroom. Within three days of the removal, a conference will be held between the appropriate administrator, the student’s parent, the removing teacher, and the student. Following the conference, the principal will order the placement of the student. The principal will not return the student to the teacher’s class without that teacher’s consent, unless the Placement Review Committee, which consists of the principal, assistant principal, and the assistant superintendent, determines that such placement is the best or only alternative.

- **Corporal punishment.** The Temple ISD Board of Trustees prohibits the use of corporal punishment in the District. Students shall not be spanked, paddled, or subjected to other physical force from an employee as a means of discipline for violations of the Student Code of Conduct. Exceptions include coaches, physical education teachers, and classroom teachers supervising students during athletic training, competition, or physical education or outdoors supervising students during recess or lunch, who may use reasonable physical exercises or activities to encourage moderate or vigorous physical activity by students and as a measure to enforce class or team rules in their classes and activities. These exercises or activities are not considered to be “corporal punishment.” The DAEP director may permit students to perform exercises, such as push-ups and similar exercises, in lieu of other punishment for infractions of DAEP rules. No other employees may use exposure to the physical elements, e.g., standing outside in heat or cold, or physical exertion, e.g., running, sit-ups, etc., as a disciplinary measure.

- **Removal to DAEP**
- **Extension of DAEP removal term for additional offenses while in the program**
- **Expulsion**
- **Placement in a Juvenile Justice Alternative Education Program (JJAEP)**

---

4 Typically, “placement” refers to a change in classroom assignment, if mutually beneficial for the student and the teacher/class. There is no presumption that a change of placement is disciplinary in nature. On occasion, parents request to have students moved to another classroom and decisions are also made to move students to other classrooms by the Placement Review Committee when it is determined that the placement would be beneficial for the student.

5 All expelled students are not sent to JJAEP. However, all students charged with a Class B misdemeanor offense or higher are sent to JJAEP.
The District emphasized to OCR that the only individuals who have authority to impose significant disciplinary sanctions (OSS, DAEP, expulsion) are the campus behavior coordinators at each campus, which includes campus principals, assistant principals, and the District Hearing Officer and Assistant Superintendent for uphold-conferences and expulsions. Pursuant to the SCC, the school has the authority to administer discipline whenever the interest of the school is involved, on or off school property, in conjunction with or independent of classes and school-sponsored activities.

The SCC states that, in assessing all discipline, administrators will consider:

- The seriousness of the offense
- The student’s age
- The student’s attitude
- The potential effect of the misconduct on the school environment
- The student’s disciplinary history
- Evidence that the Response to Intervention model has been used

The SCC further states that, in making a decision concerning suspension, removal to the DAEP, expulsion, or placement in a JJAEP, regardless of whether the decision concerns mandatory or discretionary disciplinary action, administrators shall also consider:

- Whether the student was defending himself or herself
- The student’s intent or lack of intent at the time the student engaged in the conduct
- The student’s disciplinary history
- A disability that substantially impairs the student’s capacity to appreciate the wrongfulness of the student’s conduct, but only as required by Federal law and regulations related to discipline of students with disabilities

The SCC incorporates due process procedures only for DAEP referrals, expulsions, and JJAEP placements; those procedures include the right to an initial hearing/conference with the students’ parents, and to appeal the District’s decision following the hearing/conference. No due process procedures are provided for lesser sanctions, including suspension.

Through OCR’s file review, as well as information obtained through staff interviews, OCR learned that teachers throughout the District utilize different methods for meting out discipline. Some staff members informed OCR that they adhere strictly to the discipline procedures outlined by the District, while others stated that they develop and implement discipline policies for their individual classes (e.g., modified warning systems).

The TISD’s discipline policies and procedures are disseminated to all staff and reviewed each year prior to the beginning of school during in-service meetings. District staff informed OCR that it is at this time that they receive training on the policies and procedures. With regard to

---

6 TISD informed OCR that it provides student academic and behavioral support through the Response to Intervention (RTI) process. RTI is a multi-tiered approach used to increase the opportunity for all students, and in particular those who have not yet been identified as disabled, to meet academic achievement standards through early identification of students whose academic and/or behavioral needs place them at risk.
students, teachers informed OCR that at the beginning of each school year, they routinely review discipline policies and procedures with students in their classrooms and ensure that each student is provided a student handbook, which requires that parents sign to evidence receipt of the document. The student handbook references the SCC, and contains much of the information found in the SCC, but is a separate document. It is unclear to what extent the SCC may be distributed to students and/or parents, though it is posted on the District’s webpage.

TISD provides limited academic services to students assigned to alternate placements as a result of discipline. Information provided by the District indicates that students assigned to ISS receive regular assignments from their teachers for the duration of their suspension. OCR has not received any information to show that the District has developed/implemented a program that would provide academic services to students who have received OSS. The SCC provides that, “[i]nstruction in the DAEP will focus on English language arts, mathematics, science, history, and self-discipline. The District is not required to provide electives, foreign languages, or honors or advanced courses of any kind at the DAEP.” The SCC further provides,

The District will provide an opportunity for students who have been placed in the DAEP to complete a foundation curriculum course in which the student was enrolled at the time of removal before the beginning of the next school year, if the term of the student’s placement is such that the student is not able to continue enrollment in all his or her courses. The opportunity to complete coursework will be provided through any method available, which may include summer school, distance learning, or correspondence courses. Parents will receive notice of all the methods available for completing coursework in the written materials provided to parents when a student is placed in the DAEP. The District will not assess any charge for the student to complete a course under this provision.

The extent to which academic services are provided to students assigned to JJAEP is unclear from the SCC and the other information obtained during the investigation. According to the Bell County’s description of the JJAEP, the JJAEP must focus on English language arts, mathematics, science, social studies, and self-discipline and shall also provide a high school equivalency program.

**Disciplinary Alternative Education Program (DAEP)**

The SCC describes the District’s DAEP as follows:

The DAEP:
1. is in a setting other than the student’s regular classroom;
2. is located off a regular school campus;
3. separates students in the DAEP from students in the regular program or in another disciplinary setting in the same building as the DAEP;
4. separates elementary school students assigned to DAEP from secondary school students assigned to DAEP;
5. focuses on English language arts, mathematics, science, history, and self-discipline;
6. provides for students’ educational and behavioral needs;
7. provides supervision and counseling;
8. employs only teachers who are fully certified with a certified teacher-to-student ratio of one teacher for each 15 students, elementary through high school grades; and
9. provides at least a 7-hour school day, including lunch and other breaks, but not longer than 10 hours each day.

The SCC provides that DAEP referrals can, with limited exceptions based on student age and nature of offense, range in length from three school days to one academic year. The length of any particular DAEP referral is at the sole discretion of the administrator responsible for the referral. The length of a DAEP student’s referral is reduced only by the number of “successful days” that he or she completes; that is, days on which “the student is present, completes all assigned work, follows all rules of the DAEP, and engages in no additional violations of the Student Code of Conduct.”

The SCC identifies both mandatory and discretionary DAEP referral reasons. The mandatory reasons include, but are not limited to: (1) making a false report of bombing, fire, or other emergency; (2) conduct punishable as a felony; (3) drug- or alcohol-related offenses; (4) public lewdness; and (5) “serious or persistent misbehavior, subject to administrative discretion.” The discretionary DAEP referral reasons include, but are not limited to: (1) gang-related behavior; (2) hazing; (3) bullying or harassment; (4) dating violence; and (5) “[r]epeatedly violating other previously communicated campus or classroom standards of behavior.”

The SCC provides that students referred to DAEP (together with their parents) will be permitted an opportunity to “give [their] version of events at a conference to be scheduled and held within three class days.” Students referred to DAEP, or their parents, are also permitted an opportunity to appeal DAEP referrals to the school board, but referred students remain in DAEP during the time the appeal is pending. Information obtained from the District reveals that DAEP students return to their original schools upon the conclusion of their DAEP placements. Before a student returns, however, the District conducts a meeting with the student, the student’s parents, and TISD staff to ensure a smooth transition from DAEP to the regular education environment. OCR was informed that TISD does not track the rate at which DAEP students drop out of school.

Record Storage and Maintenance

In response to OCR’s request for a description of the District’s record-keeping system for student discipline, the TISD informed OCR that all student discipline is recorded, stored, maintained and accessed using the Skyward Student Management System. Referrals are made by teachers or staff through this system and administrators record and track the disciplinary actions using this program. Skyward is one of the student management software systems approved by the State of Texas and is used to report student discipline data to the Texas Education Agency through the Public Education Information Management System as required by statute.

The TISD furthered stated that the teachers document in writing the specific behaviors of the student on the electronic referral when sent to the principal’s office. The form is not intended to be a laborious process for the teacher. If on occasion a principal requires more clarification of
the incident, they will ask the teacher. The student is also given the opportunity to explain their side of the incident in the principal’s office when they discuss the referral.

B. School Resource Officers (SROs)

The 2015-2016 SCC does not provide information regarding the District’s use of SROs in the enforcement of the discipline policy. During the early stage of OCR’s investigation, TISD reported to OCR that it employed six SROs. Pursuant to an “Interlocal Agreement” (contract) between TISD and the Temple Police Department (TPD), TISD paid the TPD for two of the officers, and the four others were paid for on a grant by TPD. Two officers were stationed at Temple High School. The Wheatley Alternative Education Center and the three TISD middle schools each employed one officer. Edwards Academy, the eight TISD elementary schools, and the Pre-Kindergarten center had access to SROs on an “on-call” basis. The District informed OCR that in the fall of 2013 two new SROs were hired to serve the elementary schools. TISD reported that each of its SROs is certified by the National Association of School Resource Officers.

TISD informed OCR that the primary duty of SROs involved crisis management (e.g., creating campus crisis plans, running crisis drills, and acting as first responders in crisis). Additionally, as set forth in the contract, SROs operate pursuant to a “Triad Concept,” under which they act as armed law enforcement officers, counselors, and educators.

The contract specifically stated that, “SROs must realize that they are enforcement officers in regards to CRIMINAL matters only.” The contract further outlines that SROs should not enforce any “school or house rule,” but with the consent of the campus principal may inform students of a flagrant rule violation that affects building order maintenance when a school official is not available. The contract states that SROs are not school disciplinarians and should not assume this role, and that SROs will not involve themselves in the administrative matters of the TISD, which are not criminal offenses. SROs, pursuant to the contract, are to be used as a resource to assist students, faculty, staff and all persons involved with the school District in a wide variety of subjects including, but not limited to, drug and alcohol education, in order to build rapport with students and staff. Moreover, the contract provided that TISD will work cooperatively with the SROs to reduce criminal acts on school property and threats to schools.

During interviews, TISD administrators informed OCR that SROs play no role in the imposition of disciplinary penalties, and that SROs are called to intervene in situations when a law is suspected to have been broken or when students or staff feel threatened and/or fear for their safety. TISD informed OCR that it does not maintain records of citations given to students by SROs; rather, each SRO provides a monthly report to his or her TPD sergeant containing this information.

In an effort to obtain additional information about the manner in which SROs operate in the District, OCR conducted an interview with the police sergeant (SR) who supervised all TISD SROs during the 2010-20111 through the 2012-2013 school years. SR stated that all of the SROs are employed by the city police department, not the District, and are required to adhere to
all rules and regulations established by the police department. During the interview with SR, OCR was also informed that prior to becoming an SRO, all aspiring SROs are required to complete a 40-hour SRO training course. In addition, he stated that all SROs are required to attend an SRO conference that is held annually. SR stated that the SROs respond to incidents just as they do when working off campus. SR stated that they mainly respond to fights and other altercations, which require written reports that are routed to the police department. SR stated that the SROs have no discretion in the discipline and referral process and that these decisions are left to the schools. He stated that students are sent to the juvenile justice system for Class B offenses and above, at which time a juvenile investigator makes the decision as to whether the student will be referred to juvenile court.

OCR obtained from the Temple Police Department copies of all tickets issued for students from the 2010-2011 school year through the 2012-2013 school year. OCR’s review revealed that during this time period, a total of three tickets were issued: one ticket was issued to a White student for fighting, and two tickets were issued to the same African-American student for trespassing twice during the course of a week. Based on this information, OCR could not infer or conclude that TISD’s SROs appear to treat African-American students differently than White students with respect to the issuance of tickets. The only available JJAEP information, which OCR obtained from TISD’s data response, shows that in 2011-2012, one White student from XXXX XXXX School was sent to JJAEP for the offense of XXXX, while in 2012-2013, one African-American student from XXXX XXXX School was sent to JJAEP for the offense of XXXX. According to TISD, no other students were sent to JJAEP through the end of the 2012-2013 school year.

During a later stage of OCR’s investigation, the District reported to OCR that during the 2015-2016 school year, it received law enforcement services from seven SROs. Two officers were stationed at Temple High School, while the other five officers were assigned to a combination of from three to five sites (elementary schools, middle schools, the Freeman Heights Academic Office, and the District administrative office). The current SRO contract does not contain a mission statement, does not identify the SROs’ duties, and provides no information regarding the SROs role, if any, in carrying out the enforcement of discipline in the District.

The District reiterated that “SROs are not school employees; they are peace officers in the schools. They are never involved in the actual administration of discipline; they never make disciplinary decisions. They make law enforcement decisions based on the faithful execution of their oath of office.” The District pointed OCR to its “Wrap-around Student Services” webpage, which contains the following information about the campus SROs:

A School Resource Officer or an “SRO” is a member of a select group of City of Temple Police Officers that receive special training. These officers are assigned to Temple ISD Schools on a full-time basis, and work as mentors for TISD students. [SROs] are full time law enforcement officers employed by the Temple Police Department. The SRO works to protect and maintain a safe and secure environment for students and educators. The SRO investigates and takes appropriate action related to criminal activity that may occur on school campuses. The [SROs] that are assigned to middle and elementary schools coordinate the GREAT program and safety classes for students.
In response to OCR’s request for guidance provided to staff and administrators regarding the referral and administration of student discipline, the District provided the following documents:

- TISD Restorative Discipline Implementation
- TISD Counseling Referral Process
- 2015 Diversity Conference Program
- Bullying Checklist for Principals
- Behavioral RtI Interventions Workflow
- Behavior Interventions in TEKS Resource System Presentation
- Guide Tier 3 Intensive Supports, and
- TISD District-Wide Behavior Management Plan, which is comprised of five interrelated components: (1) Student Code of Conduct and the TISD Parent and Student Handbooks; (2) Positive Behavioral Supports: Foundations, CHAMPS and Restorative Discipline; (3) Behavioral Response to Intervention; (4) Campus Behavior Management Plans; and (5) Classroom Discipline Procedures.

In response to OCR’s request for comprehensive improvement/strategic plan or other programs implemented by the TISD to decrease disciplinary actions resulting in removal from the educational setting, the District informed OCR that, in the 2015-2016 school year, TISD added two Positive Behavioral Support programs as part of the discipline framework to provide administrators with training about discipline, the goal of discipline and a different way to view discipline. The first program, Restorative Discipline, is “a philosophy as well as a set of practices that helps educators know how to respond to problems as they arise, create school communities where problems are less likely to arise in the first place, and less likely to be repeated when they do happen.” The District informed OCR that “part of the reason for bringing in Restorative Discipline was to reduce traditional discipline methods of exclusion that effect minority students more than others.” The District informed OCR that Temple ISD administrators, counselors and all Temple ISD SROs have attended training on this program and will continue to attend more training on the program.

The second program, Trust-Based Relational Interventions (TBRI), which is “a therapeutic model that trains caregivers to provide effective support and treatment for at-risk children, was implemented during the Spring 2016 semester. The District reported to OCR that TBRI focuses mostly in TISD’s PK-3RD grades. Additionally, TISD reported to OCR that it participated as one of the planning partners in the Region 12 Diversity Conference held on August 3-4, 2015; TISD sent campus administrative teams to the conference with the targeted objective of receiving diversity training and hearing from two of the national experts on diversity training.

In response to OCR’s request for a description of proactive measures the TISD has taken to ensure that student disciplinary referrals and sanctions are applied in a consistent manner, the District informed OCR that it uses a wide variety of Safe and Civil Schools resources to maintain a proactive environment towards student discipline, and employs Communities in Schools staff to work with students in a positive manner. The District informed OCR that it provides academic and counseling services to all students, including students who receive ISS, OSS and for students placed in alternative schools/programs, and students returning from juvenile offender facilities are provided access to educational and counseling support services. Further, the District
informed OCR that it uses the Academic and Behavioral Response to Intervention (RTI) process to identify students who need additional academic and emotional support to be successful. The District reported that students with social skill deficits may be involved in small group interventions, while behavior contracts and more formal plans may be developed for students at RTI tier 2 and additional supports continue into RTI tier 3, when appropriate.

C. Application of Discipline during the 2010-2011 School Year

In September 2011, OCR conducted an onsite visit of the TISD to collect and review discipline files. OCR’s analysis focused primarily on identifying possible disparate treatment of similarly-situated African-American and White students. In conducting that analysis, OCR started by identifying the following nine infractions as the ones that were most frequently cited as the basis for disciplining TISD students:

<table>
<thead>
<tr>
<th>Failure to Comply (Directives)</th>
<th>Cell Phone Usage</th>
<th>Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Failure to Comply (Policies)</td>
<td>Leaving w/o Permission</td>
<td>Inciting Violence</td>
</tr>
<tr>
<td>Disrupting Class</td>
<td>Cutting Class</td>
<td>Tardies</td>
</tr>
</tbody>
</table>

OCR conducted a Chi-Square analysis of the nine infraction categories to determine which TISD schools referred African-American students for discipline more frequently than White students at a statistically significant level. The analysis revealed that there were twelve schools that had statistically significant Chi-Square numbers for the 2010-2011 school year:

- Temple HS
- Lamar MS
- Travis MS
- Bonham MS
- Bethune Ctr.
- Cater ES
- Scott ES
- Thornton ES
- Western Hills ES
- Raye-Allen ES
- Hector P. Garcia ES
- Kennedy-Powell ES

OCR identified several examples (involving 32 total students) in which twelve African-American students were treated differently than twenty White students engaging in similar behavior. In each instance, African-American first-time offenders were disciplined more severely than White first-time offenders at the same school level (i.e., elementary, middle, and high), but not necessarily attending the same school, who had committed the same offense under very similar factual circumstances. In four of the twelve examples, the White and African-American comparator students attended the same school (i.e., three examples involved two students at XXXX, and one example involved two students at XXXX); however, in only one of the twelve examples was the same administrator responsible for disciplining the African-American and White students involved.

---

As noted below—32 of the 38 students at issue appear to indicate different treatment of African-American students as compared to White students; the remaining 6 students appear to indicate different treatment of White students as compared to African-American students.
Disciplinary Alternative Education Program (DAEP) Referrals

OCR reviewed TISD’s DAEP referrals for the 2010-2011 school year. OCR found that, although African-American students made up only 31.4 percent of the District’s student enrollment, African-American students represented 51.8 percent of all the students who were referred to DAEP and 54.3 percent of all DAEP referrals were issued to African-American students. In contrast, although White students made up 30.5 percent of the District’s student enrollment, White students represented only 16.7 percent of all students who were referred to DAEP and only 16 percent of all DAEP referrals were issued to White students. As such, OCR found a disparity in the overall percentage of DAEP referrals issued to African-American students as compare to White students.

<table>
<thead>
<tr>
<th>TISD DAEP Referrals during 2010-2011</th>
<th>African-American Students</th>
<th>White Students</th>
<th>Other Students</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td># Students Referred to DAEP</td>
<td>130 (51.8%)</td>
<td>42 (16.7%)</td>
<td>79 (31.5%)</td>
<td>251</td>
</tr>
<tr>
<td># Referrals to DAEP</td>
<td>163 (54.3%)</td>
<td>48 (16.0%)</td>
<td>89 (29.7%)</td>
<td>300</td>
</tr>
<tr>
<td>Non–Mandatory Referrals</td>
<td>129 (56.8%)</td>
<td>31 (13.7%)</td>
<td>67 (29.5%)</td>
<td>227</td>
</tr>
<tr>
<td>Mandatory Referrals</td>
<td>34 (46.6%)</td>
<td>17 (23.3%)</td>
<td>22 (30.1%)</td>
<td>73</td>
</tr>
</tbody>
</table>

Next, OCR examined the average number of infractions for both groups of students prior to being sent to DAEP. OCR concluded that African-American students were disciplined an average of 10.7 times before being first referred to DAEP, while White students were disciplined an average of 11.3 times before being first referred to DAEP. This analysis revealed a minor disparity of approximately one-half of one referral difference, slightly favoring White students, as they were allowed to “get in trouble” more times than African-American students before they were referred to DAEP.

OCR also examined the average length of students’ DAEP referrals. During the 2010-2011 school year, the average length of African-American students’ DAEP referrals was 59.3 days, whereas the average length of White students’ DAEP referrals was 28.1 days. The average length of “other” students’ DAEP referrals was 59.2 days. Clearly, these numbers indicate a disparity that favors White students by a significant margin. During the 2011-2012 school year, the average length of African-American students’ DAEP referrals was 54.5 days, whereas the average length of White students’ DAEP referrals was 51.8 days. The average length of “other” students’ DAEP referrals was 51.8 days. These numbers indicate a disparity that favors White students, but by a much smaller margin than was the case during the 2010-2011 school year.

OCR next reviewed TISD’s 2010-2011 DAEP referral data to determine whether it indicated that African-American students were referred to DAEP more frequently than White students for less significant offenses such as tardies and cell phone usage. OCR considered the prior disciplinary history of each student who was referred to DAEP for these less significant offenses. OCR focused on both African-American and White students who received fewer than five prior

---

8 OCR obtained the “average length” of DAEP referrals by calculating the sum of the number of days of all DAEP referrals, divided by the number of DAEP referrals, which included DAEP referrals that were issued to students who had more than one DAEP referral during the school year.
disciplinary referrals and more than twenty prior disciplinary referrals before being referred to DAEP. This approach was used in order to determine whether one group of students (presumably African-American students) tended to be referred to DAEP after being disciplined for a relatively small number of offenses, while another group of students (presumably White) was referred to DAEP after being disciplined for a much higher number of offenses, which may or may not have included the offenses committed by the students who were referred after committing far fewer offenses. OCR’s review did not reveal a pattern indicating that one or more student groups, African-American or otherwise, were being sent to DAEP more frequently or readily than any other student groups after committing either fewer or less significant offenses.

OCR then reviewed all of the disciplinary referrals for 2010-2011 to determine whether students, both African-American and White, were disciplined similarly for infractions that according to the SCC required a mandatory DAEP referral (Mandatory Offenses). OCR concluded that there were 172 infractions that should have resulted in a mandatory DAEP referral. Twenty African-American students accounted for 81 of the 172 infractions that should have resulted in mandatory DAEP referrals; a DAEP referral did not result from 14 of the 81 incidents (17.3%). Thirteen White students accounted for 41 of the infractions that should have resulted in mandatory DAEP referrals; a DAEP referral did not result from 7 of the 41 incidents (17.1%). OCR concluded that the DAEP data provided by TISD did not indicate that White students were treated more favorably than African-American students when being disciplined for mandatory DAEP referral offenses. The 0.2% difference that OCR observed favored African-American students by a small margin.

Additional investigation would be needed to understand the disparity in the number of DAEP referrals issued to African-American students as compared to White students, which would include obtaining anecdotal evidence through interviews and/or careful scrutiny of the discipline files of all students who were referred to DAEP after committing mandatory DAEP offenses and all students who were disciplined for offenses that were similar in nature to mandatory DAEP referral offenses, to assess whether similar misconduct was misclassified in a racially discriminatory manner.

**D. Review of Discipline during the 2011-2012 and 2012-2013 School Years**

Using the CRDC, OCR obtained information regarding the relative frequency with which TISD imposed a variety of other disciplinary sanctions against White and African-American students during the 2011-2012 and 2012-2013 school years. OCR conducted a Chi-Square analysis of the nine (earlier identified) infraction categories to determine which TISD schools disciplined African-American students more frequently than White students at a statistically significant level. The analysis revealed that during the 2011-2012 school year, the number of schools with statistically significant disparity in the nine infraction categories decreased by two (as compared to the 2010-2011 school year); Scott Elementary and Bethune Early Childhood Center were excluded from the list. And, for the 2012-2013 school year, the analysis revealed that the number of schools increased by two, as Jefferson Elementary and Meredith-Dunbar Elementary schools joined the list of those schools with statistically significant probability numbers.
In May 2013, OCR conducted a second onsite visit to TISD. During the onsite visit, the onsite team reviewed the individual discipline files of all first-time offenders in the TISD during the 2011-2012 and 2012-2013 school years, the team interviewed 29 discipline administrators and several student groups at the elementary, middle, and high school levels and the team distributed online surveys to nearly 500 teachers in the District, of which 65 percent completed the surveys.

A review of the information obtained during the May 2013 onsite visit revealed that there continued to be a significant disparity with regard to the rate at which African-American students were referred for discipline in comparison to White students. OCR’s analysis of student interviews revealed that the majority of African-American students, including those who had been disciplined and those who had not, believed that they were targeted by staff and disciplined for incidents that White students were allowed to commit on a regular basis without being disciplined. Although the majority of White student groups were of the opinion that, generally speaking, African-American students deserved harsher sanctions than White students because of aggressive behavior, there were several groups of White students, including those who had been disciplined and those who had not, who believed that African-American students were repeatedly disciplined for conduct that did not result in discipline for White students.

Like the students, TISD staff members’/administrators’ responses to OCR’s discipline-related questions were mixed. Some of the teachers and other staff members who responded to OCR’s survey and/or were interviewed stated that they believed that African-American students were treated differently than White students with respect to discipline in that they were punished more harshly and more frequently for similar offenses. However, the majority of the staff members stated that they could not identify any differences with respect to the manner in which students were disciplined based on race. The survey responses/interviews indicated that TISD teachers and disciplinarians have been inconsistent in their application of the SCC and District discipline policies/procedures, sometimes substituting their own procedures for those of the District, or otherwise interpreting the SCC on an individual basis, and differently as compared to their colleagues.

OCR identified several incidents from the 2011-2012 and 2012-2013 school years in which similarly-situated African-American and White students appeared to have been treated differently on the basis of race. During telephone conversations with OCR prior to the May 2013 onsite visit, TISD’s assistant superintendent stated that his own research conducted during the 2012-2013 school year revealed instances of what he believes may constitute different treatment of similarly situated African-American and White students. The assistant superintendent added that the District has been taking proactive steps to address TISD’s African-American/White discipline disparity, including terminating some staff members and instituting regular staff meetings to discuss the application of District discipline policies in an effort to improve consistency. Notwithstanding these steps, however, the assistant superintendent acknowledged that the racial discipline disparity remains, and that the District was interested in working with OCR to the extent necessary to resolve the compliance concerns related to the disparity.

During the timeframe of OCR’s review, the District informed OCR that it has worked diligently to reduce disciplinary removals and work with both parents and students to get to know the
students on a personal level; by working with parents and students, administrators get to know
the students and parents on a personal level to the point that they know what works and what
does not work for particular students. The District further stated that many times, due to the
students’ or parents’ circumstances, the administrator may come up with a consequence to meet
the individual needs of a student. For example, the District stated that ISS may be given in lieu
of Saturday School or Afterschool Detention because of transportation issues. Also, the District
stated that it sometimes assigns specific disciplinary sanctions at the request of the parents. The
District stated that prior-year referral information was considered in assigning sanctions;
however, it further noted that disciplinary consequences start over each year.

The District stated that in assessing discipline, administrators consider:

- The seriousness of the offense
- The student’s age
- The student’s attitude
- The potential effect of the misconduct on the school environment
- The student’s disciplinary history; and
- Evidence that the RTI model has been used

The District further stated that in making decisions concerning suspension, removal to the
DAEP, expulsion, or placement in a JJAEP, regardless of whether the decision concerns
mandatory or discretionary disciplinary action, administrators shall also consider: 1) Whether the
student was defending himself or herself; 2) The student’s intent or lack of intent at the time the
student engaged in the conduct; and 3) The student’s disciplinary history.

The District provided explanations for most of the thirty-two incidents of potentially different
treatment that OCR identified through its review of the 2010-2011, 2011-2012 and 2012-2013
discipline referrals. With regard to nine of the incidents, however, the District acknowledged
that it could not identify a legitimate, non-discriminatory reason for imposing different sanctions.
Three of the thirty-two incidents appeared to be the result of clerical/data entry errors. In
addition, many of the District’s articulated explanations for the discipline (approximately
thirteen) had to do with prior discipline in another school year, which is inconsistent with the
stated practice of students starting each school year with a clean disciplinary history. In at least
three instances, White students with more prior discipline than their African-American
comparators still received less severe sanctions than their comparators. Further, OCR did not
find sufficient evidence to indicate that the severity of African-American students’ misbehavior
outweighed that of their White comparators’ misbehavior.

E. Analysis of Discipline Statistics for the 2014-2015 School Year

OCR looked at the administration of exclusionary discipline (ISS, OSS and DAEP) of students at
the school level (i.e., high school, middle school, and elementary school) during the 2014-2015
school year.9 Because the District reported zero pre-Kindergarten students received exclusionary

---

9 For each category of discipline (ISS, OSS, DAEP, and all three combined), the analysis counted each disciplined
student once regardless of whether the student was disciplined multiple times during the school year.
discipline during the 2014-2015 school year, the analysis did not include the pre-Kindergarten level.

Based on OCR’s Chi square analysis of ISS, OSS, DAEP and all three of these combined, OCR found that African-American students in the District continued to be subjected to exclusionary discipline at a significantly greater rate than White students at the district level and at each school level where exclusionary discipline was administered (elementary, middle, and high school). The analysis of the 2014-2015 school year indicated that the disparity in exclusionary discipline of African-American students as compared to White students was statistically significant at the district-wide level and at each of the three school levels. Further, the analysis indicated that the disparity in the administration of OSS for African-American students at the high school level was specifically, statistically significant. Prior to conducting additional file review and interviews regarding the 2014-2015 school year, the TISD expressed interest in resolving the compliance review via a voluntary resolution agreement, as described below.

**Concerns Identified During the Course of the Review**

OCR’s statistical analysis indicated a disparity in the discipline and/or referral for discipline of African-American students as compared to White students during the 2010-2011 through 2014-2015 school years. OCR’s review of discipline files revealed instances of possible different treatment of African-American students compared to their White counterparts within the same school. OCR’s interviews of students revealed the perception by African-American and White students that African-American students were disciplined for incidents that White students were allowed to commit without being disciplined.

OCR also identified portions of the 2015-2016 SCC that gave broad discretion to teachers and administrators to choose from a wide range of sanctions for the majority of offenses. In addition, some of the instances of prohibited conduct were not clearly defined, and were open to wide interpretation (e.g., any conduct that gives school officials reasonable cause to believe that the conduct will substantially disrupt the school program or incite violence; or that constitutes a failure to comply with campus or district policies). OCR’s interviews of teachers and administrators revealed that they were inconsistent in their application of the SCC and District discipline policies/procedures, sometimes substituting their own procedures for those of the District, or otherwise interpreting the SCC on an individual basis, and differently as compared to their colleagues.

**Resolution**

Prior to the conclusion of OCR’s investigation, the TISD expressed an interest in voluntarily resolving this compliance review with a resolution agreement. Accordingly, on November 6, 2017, prior to OCR making a compliance determination under Title VI regarding the issue under investigation, the TISD voluntarily submitted the enclosed resolution agreement (Agreement).

Pursuant to the Agreement, the District committed to take the following actions to review its disciplinary practices, policies, and procedures to ensure that such practices do not discriminate against students on the basis of race:
1. The District will designate an employee(s), subject to OCR’s review and approval, to serve as the District’s Discipline Supervisor(s), and will publish this individual’s name and/or title, office address, e-mail address and telephone number on its website, in all school publications regarding discipline, and in the notice that the District sends to parents annually.

2. The District will review the effectiveness of the plan(s) that the District has implemented to provide support services to assist students in minimizing misconduct.

3. The District will review and revise its student discipline policies and procedures, as necessary, and in doing so, will take into account any recommendations or suggestions made by the Discipline Review Team (referenced in the Agreement).

4. The District will ensure that it has in place at each District elementary, junior high, and high school campus a system of supports to assist students who display behavior problems.

5. The District will provide training programs to all District teachers, administrators, school aides, and any other District personnel charged with supervising students, making disciplinary referrals, or imposing disciplinary sanctions.

6. The District will provide training programs to all District students about the District’s student discipline policies and procedures and the Restorative Discipline Program in an age appropriate, easily understood manner.

7. The District will develop and administer an annual school climate survey to students (grades 5-12), staff, and parents.

8. The District will collect data, by school, regarding referrals for student discipline, the imposition of disciplinary sanctions, and referrals to law enforcement at all District schools.

9. The District will evaluate the collected discipline data to assess whether the District is implementing its student discipline policies and procedures in a non-discriminatory manner.

10. The Superintendent or Superintendent’s designee(s) will meet with the principal of each District school prior to the beginning of the fall semester to discuss the discipline data gathered by the District.

11. Each school principal will meet with the teachers and administrators at his/her school to discuss the discipline data gathered by the District.

12. The District will establish a Discipline Review Team to review the disciplinary actions taken at each District school on an ongoing basis to ensure that the actions taken were
non-discriminatory and consistent with the District’s student discipline policies, practices and procedures.

Conclusion

Based on the commitments the District has made in the Agreement described above, OCR has determined that it is appropriate to close the investigative phase of this compliance review. The District has agreed to provide data and other information demonstrating implementation of the Agreement in accordance with the reporting requirements of the Agreement. OCR may conduct additional visits and request additional information as necessary to determine whether the District has fulfilled the terms of the Agreement. Upon completion of the obligations under this Agreement, OCR shall close and dismiss this compliance review.

This letter should not be interpreted to address the TISD’s compliance with any other regulatory provision or to address any issues other than those addressed in this letter. 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.

Please be advised that TISD may not harass, coerce, intimidate, or discriminate against any individual because he or she participated in this compliance review. If this should occur, the individual may file a complaint alleging such harassment or intimidation.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. In the event that OCR receives such a request, it will seek to protect, to the extent provided by law, personally identifiable information, which, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

OCR appreciates the cooperation and assistance of the TISD in coordinating the compliance review activities. If you have any questions regarding this letter, you may contact Adriane Martin, Supervisory Attorney/Team Leader, at (214) 661-9678 or Adriane.Martin@ed.gov, or Tiffany Gray, Attorney, at (214) 661-9611 or Tiffany.Gray@ed.gov.

Sincerely,

Taylor D. August
Regional Director
Office for Civil Rights
Dallas Office

Enclosure