

**RESOLUTION AGREEMENT**  
**St. Louis Public Schools**  
**OCR Case Number 07-16-1921**

St. Louis Public Schools (the District) enters into this Resolution Agreement (Agreement) with the U.S. Department of Education (Department), Office for Civil Rights (OCR), to resolve OCR Case Number 07-16-1921 and ensure its compliance with Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, 29 United States Code (U.S.C.) § 794, and its implementing regulation at 34 Code of Federal Regulations (C.F.R.) Part 104, and Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. §§ 12131 *et seq.*, and its implementing regulation at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability by recipients of Federal financial assistance and public entities, respectively; and compliance with Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d *et. seq.*, and its implementing regulation at 34 C.F.R. Part 100, which prohibits discrimination on the basis of race, color, and national origin by recipients of Federal financial assistance.

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

Notice of Non-Discrimination

1. The District will revise the abbreviated and full combined notice of non-discrimination contained in SAB Policy 2471 so that it: a) specifies the bases for nondiscrimination in the District’s education programs and activities and includes a statement that the District provides equal access to the Boy Scouts and other designated youth groups; and b) identifies by name or title, mailing address, telephone number, and email address the employee(s) responsible for coordinating the District’s nondiscrimination compliance efforts, particularly the employee(s) responsible for coordinating the District’s compliance efforts under Title VI, Title IX of the Education Amendments of 1972, Section 504, Title II, and the Age Discrimination Act of 1975.

**REPORTING REQUIREMENT:** By July 1, 2018, the District will submit to OCR its revised notice of non-discrimination for review and approval.

2. XXXXX XXXXX XXXXX XXXXX will widely publish the revised notice of nondiscrimination, including by posting it on the school-site page of the District’s website, publishing it in its school-site student and staff handbooks, posting it at the school-site building, and by any other means of notification the District deems effective to ensure that the information is widely disseminated to XXXXX XXXXX XXXXX XXXXX students and parents or guardians of XXXXX XXXXX XXXXX XXXXX students.

**REPORTING REQUIREMENT:** By September 1, 2018, the District will provide OCR with documentation that the revised notice of non-discrimination has been published, including a link to where the notice can be found on the school-site page of the District’s website and copies of relevant pages of the XXXXX XXXXX XXXXX XXXXX Student Handbook, XXXXX Family Handbook, and Staff Handbook.

Staff Training

3. The District will ensure all XXXXX XXXXX XXXXX XXXXX personnel, including administrators, teachers, counselors and family and community specialists, will be effectively and appropriately trained on the responsibility to report incidents of possible discrimination, including harassment, based on disability and discrimination based on race, color, and/or national origin to the Compliance Coordinator, and the procedures for doing so. The training will provide instruction on how to recognize, prevent, and respond appropriately to such discrimination or harassment about which they know or reasonably should have known. The training will also address the prohibition of retaliation against persons who report discrimination based on disability and discrimination based on race, color, and/or national origin or participate in related proceedings.

REPORTING REQUIREMENT: By October 1, 2018, the District will provide documentation to OCR demonstrating that the first annual training required by Item 3 of the Agreement was provided to all XXXXX XXXXX XXXXX XXXXX personnel, including administrators, teachers, counselors and family and community specialists. The documentation must include: the date(s) of the training; the name(s) and credentials of the presenter(s); and copies of any materials used during the training, including any handouts, guides or other materials. The District does not need to submit documentation to OCR regarding subsequent annual training sessions unless OCR requests such information from the District.

4. The District will ensure all XXXXX XXXXX XXXXX XXXXX personnel directly involved in processing, investigating, and/or resolving complaints of disability discrimination and complaints of race, color, and/or national origin discrimination will be effectively and appropriately trained. The training will, at a minimum, include instruction on how to conduct and document the prompt and equitable investigation of reports alleging discrimination on the basis of disability, including harassment, and reports alleging discrimination on the basis of race, color, and/or national origin; making findings as to whether discrimination or harassment occurred; identifying remedies (including interim measures) necessary to address the discrimination or harassment, eliminate any hostile environment, prevent recurrence, and address the effects; and will be available to present any investigative report and/or answer questions about the proceedings.

REPORTING REQUIREMENT: By October 1, 2018, the District will provide documentation to OCR demonstrating that the first annual training required by Item 4 of the Agreement was provided to all XXXXX XXXXX XXXXX XXXXX personnel directly involved in processing, investigating, and/or resolving complaints of disability discrimination and complaints of race, color, and/or national origin discrimination. The documentation must include: the date(s) of the training; the name(s) and credentials of the presenter(s); and copies of any materials used during the training, including any handouts, guides or other materials. The District does not need to submit documentation to OCR regarding subsequent annual training sessions unless OCR requests such information from the District.

Student-Focused Remedy

5. If the District receives notice that the Student intends to return to the District during the 2017-2018 school year the District will immediately request a meeting with the Complainant, to discuss steps the District will take to address the Student’s needs. These steps may include, but are not limited to, developing a safety plan in collaboration with the Complainant and Student, identifying specific contact person(s) to whom Student should report incidents of harassment or bullying if they occur, identifying the protocol the Student’s school will follow to communicate with the Complainant regarding any incidents of harassment or bullying of the Student if they occur, and checking in with Student on a periodic basis (at least every school quarter) to ascertain whether any instances of harassment, bullying, or retaliation have occurred, and taking prompt and appropriate action in accordance with this Agreement if any such harassment, bullying, and/or retaliation has occurred.

REPORTING REQUIREMENT: If the District receives notice that the Student intends to return to the District during the 2017-2018 school year, the District will provide OCR a statement indicating the date of the Student’s enrollment and the school-site the Student has been assigned to within 30 days of the District’s receipt of such notice.

REPORTING REQUIREMENT: By May 30, 2018, the District will provide to OCR documentation of a meeting request made pursuant to this Item, the response from the Complainant regarding the request, and notes from the meeting outlining what steps, if any, the District agreed to take as a result of the meeting. This requirement is not applicable if the Student does not return to the District during the 2017-2018 school year.

The District understands that by signing this Agreement, it agrees to provide the foregoing information in a timely manner in accordance with the reporting requirements of this Agreement. Further, the District understands that during the monitoring of this Agreement, if necessary, OCR may visit the District, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the District has fulfilled the terms of this Agreement and is in compliance with Section 504 at 34 C.F.R. § 104; the regulation implementing Title II at 28 C.F.R. § 35; and the regulation implementing Title VI at 34 C.F.R. § 100.3, which were at issue in this case. Upon completion of the obligations under this Agreement, OCR shall close and dismiss this case.

The District understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10), or judicial proceedings to enforce this Agreement, OCR shall give the District written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

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Dr. Kelvin R. Adams, Superintendent  
St. Louis Public Schools

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10/30/2017  
Date