

RESOLUTION AGREEMENT

Northland Preparatory Academy (Arizona) Case Number 08-16-1335

In order to resolve the open allegations in Case No. 08-16-1335, filed against Northland Preparatory Academy (Academy) and opened for investigation by the U.S. Department of Education, Office for Civil Rights (OCR) pursuant to Title VI of the Civil Rights Act of 1964 and its implementing regulation at 34 Code of Federal Regulations Part 100, the Academy agrees to take the actions outlined in this Resolution Agreement.

During the course of OCR's investigation, the Academy indicated its willingness to take steps necessary to ensure compliance with Title VI. The Agreement requirements are aligned with the identified issues and consistent with Title VI's regulatory requirements. The Academy's decision to enter into this agreement is not an admission of liability or wrongdoing, nor shall it be construed as such.

1. By March 31, 2017, the Academy will revise its policies and procedures regarding discrimination on the basis of race, color, or national origin, which may include but not be limited to its complaint procedure and disciplinary policies, as follows. The revised policies and procedures will:
 - a. State that the Academy is responsible for determining whether a hostile environment exists regardless of whether a formal complaint is filed, provided the Academy knows or should have known of the underlying behavior;
 - b. Include procedures that provide for a prompt investigation of complaints, including designated and reasonably prompt timeframes for major stages of the complaint process;
 - c. Provide for a response that is reasonably calculated to end any harassment, remedy its effects, and prevent recurrence; and
 - d. Explain (1) that discrimination includes harassment and (2) what race, color, and national origin harassment is, including a definition of a hostile environment and examples of race, color, and national original harassment.

REPORTING REQUIREMENT: By March 31, 2017, the Academy will submit, for OCR review and approval, its revised policies and procedures.

2. Within 30 days of OCR's approval of the Academy's revised policies and procedures in Term 2, the Academy will adopt, implement, and publish the revised policies and procedures, including (1) on the Academy's website, (2) in its Student Handbook, (3) in other publications used by the Academy, and (4) by emailing notice of the revised policies and procedures to all students and parents/guardians.

REPORTING REQUIREMENT: Within 60 days of OCR's approval of the Academy's revised policies and procedures in Term 2, the Academy will provide OCR the following: (1) documentation that it has adopted and implemented the revised policies and

procedures; (2) a list of locations, including the internet, where the Academy has published the revised policies and procedures; and (3) documentation that it has emailed notice of the revised policies and procedures to all students and parents/guardians.

3. The Academy will convene a school assembly that addresses (but is not necessarily limited to) the Academy's prohibition on the use of racial epithets, including disciplinary consequences for using racial epithets.

REPORTING REQUIREMENT A: By December 12, 2016, the Academy will submit, for OCR's review and approval: (1) a summary of the proposed school assembly and any materials it proposes to use at the assembly; and (2) the identity of who will be moderating the assembly.

REPORTING REQUIREMENT B: Within 30 days of OCR's approval, the Academy will provide documentation demonstrating that the assembly (1) was held, and (2) addressed the Academy's prohibition on the use of racial epithets, including disciplinary consequences for using racial epithets.

4. The Academy will offer counseling to all students involved in the two underlying incidents that occurred at the high school and were the subjects of this complaint.

REPORTING REQUIREMENT: Within 30 days of this agreement, the Academy will provide OCR with a statement that it has complied with Term 4 of this Agreement, including a statement and any documents relating to its offer, whether each student accepted or declined the offer, and the duration and staff assigned to each student who accepts the offer.

The Academy 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 Academy understands that during the monitoring of this Agreement, if necessary, OCR may visit the Academy, interview Academy staff and students, and request such additional reports or data as are necessary for OCR to determine whether the Academy has fulfilled the terms of this Agreement and is in compliance with Title VI of the Civil Rights Act of 1964 and its implementing regulation at 34 Code of Federal Regulations Part 100, which was at issue in this case.

The Academy understands that OCR will not close the monitoring of this Agreement until OCR determines that the Academy has fulfilled the terms of this Agreement and is in compliance with Title VI of the Civil Rights Act of 1964 and its implementing regulation at 34 Code of Federal Regulations Part 100, which was at issue in this case.

The Academy 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 the Agreement, OCR shall give the Academy written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

/s/

Superintendent Robert Lombardi
For Northland Preparatory Academy

December 15, 2016

Date