

## **RESOLUTION AGREEMENT**

### **Paramount Academy OCR Case Number 08-17-1341**

Paramount Academy (“the School”) enters into this Agreement to resolve the allegations in the above-referenced complaint. This Agreement does not constitute an admission of liability, non-compliance, or wrongdoing by the School. The School assures the Office for Civil Rights (OCR) that it will take the following actions to comply with the requirements of Title VI of the Civil Rights Act of 1964 (“Title VI”), and its implementing regulation, at 34 Code of Federal Regulations (C.F.R.) Part 100, which prohibit discrimination on the basis of race, color, or national origin by recipients of Federal financial assistance.

#### Apology to the Student and Complainant

- I. Within thirty (30) calendar days of this Agreement being signed, the School will submit to OCR for review and approval a draft letter to the Student and Complainant apologizing for the comments by the Teacher, the School’s response (or lack thereof) to the Teacher’s comments, and the School’s response to the Student wearing his hair in an afro style.
- II. The School will promptly and fully address feedback, if any, from OCR until it receives OCR’s final approval of the letter.
- III. Within fifteen (15) calendar days of receiving final approval of the letter from OCR, the School will provide the letter to the Complainant.
- IV. Within thirty (30) calendar days of receiving final approval of the letter from OCR, the School will provide OCR with documentation showing that the School provided the letter to the Complainant.<sup>1</sup>

#### Dress Code Revisions

- V. Within thirty (30) calendar days of this Agreement being signed, the School will submit to OCR for review and approval a revised dress code. The revised dress code will include, at a minimum:
  - a. A statement that the School will not discriminate on the basis of race, color, or national origin in the administration of the dress code;
  - b. A statement that individual staff members may not institute grooming standards for students that are not addressed in the School’s dress code;
  - c. A description of what students, parents, and staff may do if they believe that the dress code has been applied in a discriminatory manner; and
  - d. A statement that afros will not be considered to be a violation of the dress code.
- VI. The School will promptly and fully address feedback, if any, from OCR until it receives OCR’s final approval of the revised dress code.

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<sup>1</sup> Examples of documentation include a copy of an email or a delivery receipt showing the Complainant as the recipient of the email or letter.

- VII. Within thirty (30) calendar days of receiving OCR's final approval of the revised dress code, the School will adopt and beginning implementing the dress code, and provide to OCR:
- a. Copies of the final, revised dress code;
  - b. Documentation showing that the final, revised dress code has been posted on relevant webpages on the School's website;
  - c. Documentation showing that the final, revised dress code has been disseminated to School staff and its Director; and
  - d. Documentation showing that the final, revised dress code has been disseminated to the parents of all students attending the School.

#### Data Collection

- VIII. Upon signing this Agreement, the School will immediately begin collecting and maintaining data about all dress code violations relating to hair violations that result in any type of consequence, including, but not limited to, an oral warning, a written warning, parent notification, or suspension. The data will be maintained in a spreadsheet format for a period of at least three school years. The data will include, for each violation:
- a. The date of the violation;
  - b. The student's name;
  - c. The student's grade;
  - d. The student's sex;
  - e. The student's race;
  - f. A brief description of the violation; and
  - g. The consequence issued.
- IX. Within thirty (30) calendar days of this Agreement being signed, the School will submit to OCR for review and approval, a written plan for collecting and maintaining the data required by Term VIII.
- X. The School will promptly and fully address feedback, if any, from OCR until it receives OCR's final approval of the data collection plan.
- XI. Within fifteen (15) calendar days of receiving final approval of the data collection plan from OCR, the School will disseminate the data collection plan to all School staff and its Director.
- XII. Within thirty (30) calendar days of receiving final approval of the data collection plan from OCR, the School will provide to OCR documentation showing that the data collection plan was disseminated to all School staff and its Director.
- XIII. By June 29, 2018, the School will submit to OCR all data about dress code violations relating to hair from the 2017-2018 school year, including all data required by Term VIII of this Agreement.
- XIV. By June 29, 2019, the School will submit to OCR all data about dress code violations relating to hair from the 2018-2019 school year, including all data required by Term VIII of this Agreement.

Staff Training

- XV. Within thirty (30) calendar days of receiving OCR's approval for the revised dress code (see Term X) and the data collection plan (see Term VIII), the School will submit to OCR for review and approval:
  - a. Draft materials to train all staff members at the School and its Director about cultural competency, Title VI's prohibition on race-based harassment of students by staff and the School's obligations under Title VI in responding to such harassment, the dress code revisions required by Term X, and the data collection required by Term VIII; and
  - b. The name(s), title(s) or position(s), and qualifications of one or more proposed individuals to provide the training(s).
  
- XVI. Within sixty (60) calendar days of receiving OCR's final approval of the materials and trainer(s), the School will provide the training(s).
  
- XVII. Within thirty (30) calendar days of the training(s) being provided, the School will provide to OCR:
  - a. The date(s), time(s), and location(s) of the training(s);
  - b. Confirmation that the approved trainer(s) delivered the training(s);
  - c. The agenda(s) and materials from the training(s);
  - d. The names and titles of all staff who attended the training(s); and
  - e. The name(s) and title(s) of all staff who did not attend the training(s), and an explanation for each person's absence.

The School 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. Sections 100.9, 100.10), or judicial proceedings to enforce this Agreement, OCR will give the School written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

The School 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 School understands that, during the monitoring of this Agreement, if necessary, OCR may visit the School, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the School has fulfilled the terms of this Agreement and is in compliance with Title IV and its implementing regulation. Upon completion of the obligations under this Agreement, OCR will close this case.

**For Paramount Academy:**

/s/  
Mr. Dale Cline, Executive Director

12/13/17  
Date