



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

1244 SPEER BLVD., SUITE 310
DENVER, CO 80204-3582

REGION VIII

ARIZONA
COLORADO
NEW MEXICO
UTAH
WYOMING

October 31, 2022

Dr. Rob Anderson
Superintendent
Boulder Valley School District RE-2
6500 Arapahoe Road
Boulder, Colorado 80303

By email only to rob.anderson@bvsd.org

Re: OCR Complaint No. 08-22-1378
Boulder Valley School District RE-2

Dear Superintendent Anderson:

On May 4, 2022, the United States Department of Education (Department), Office for Civil Rights (OCR) received a complaint against the Boulder Valley School District RE-2 (District). The complaint alleges that the District is discriminating against students at the Columbine Elementary School (School) on the basis of national origin. Specifically, the complaint alleges the District has failed to:

1. provide English learner (EL) students in the English-only program (non-biliteracy) with a language assistance program (LAP) that is educationally sound and proven successful;
2. sufficiently staff and support the LAPs for EL students in the English-only program (non-biliteracy); and,
3. ensure meaningful communication with limited English proficient (LEP) parents.

Because OCR has jurisdiction and the complaint was filed timely, OCR initiated an investigation pursuant to 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 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 this law and regulation.

I. Investigation Summary

On June 22, 2022, OCR opened the allegations for investigation in accordance with OCR's *Case Processing Manual* (CPM). OCR's investigation included interviewing the complainant(s); reviewing documents pertinent to the complaint allegations, including information, records, and data from the District; and, going on-site to the School and interviewing nine School staff

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

members. After carefully considering all of the information obtained during the investigation, OCR found insufficient evidence to support a violation finding with regard to allegation #2. Further, the District resolved the remaining allegations pursuant to Section 302 and Section 110(d) of the CPM. The reasons for OCR’s conclusions are set forth in more detail below.

II. Background

The School is an elementary school in the District serving students in pre-kindergarten through fifth grade in Boulder, Colorado.

Language Assistance Program

During the 2021-22 school year (SY), the School provided English language development (ELD) services to 136 EL students through its literacy-based sheltered instruction¹ LAP. The majority of the School’s EL students, approximately 92%, were placed in the biliteracy strand at the choice of the EL students’ parent(s)/guardian(s). The biliteracy strand is offered to heritage- and native-Spanish speaking EL students. The remaining EL students, who are not heritage- or native-Spanish speaking, are in the non-biliteracy strand and in class with native-English speaking peers. During the 2021-22 SY, there were ten EL students in the non-biliteracy strand.

In addition to the ELD services provided during the literacy-based sheltered instruction, the School provides a 45-minute language block with two offerings: (1) Spanish as a world language (SWL) and (2) an additional ELD block. The ELD block is utilized to provide additional explicit ELD instruction to ELs. Students in the biliteracy strand are automatically placed in SWL, while parent(s)/guardian(s) of non-biliteracy students are offered the choice of placement. In the 2022-23 SY, the School began issuing a letter to parents regarding this choice (Parent Letter). The Parent Letter explained that the School provides literacy-based sheltered instruction and asks parent(s)/guardian(s) to choose to “also participate in **Spanish** as a World Language” or to “participate in the **English** Development class.” The Parent Letter did not explain to parent(s)/guardian(s) the District’s obligations related the provision of ELD services under Title VI. In response to the Parent Letter, at least seven parent(s)/guardian(s) elected to have their child placed in the SWL block, rather than the ELD block.

¹ The Colorado Department of Education (CDE) describes “sheltered English” or “structured immersion” as English as a Second Language models which include classroom-based instruction, “delivered in English and adapted to the students’ proficiency level.” CDE further explains that the models incorporate strategies that are “applicable in all environments where students are learning through their second language,” including “contextual clues such as gestures and visual aids into instruction, as well as attention to the language demands of the topics and activities.” Finally, CDE identifies supporting factors for selecting these models as they “[m]ay more easily serve student populations with a variety of native languages, as well as students who speak conversational English and fall into different English proficiency levels,” and that “[s]tudents are able to learn content and develop English language skills simultaneously.” Colorado Department of Education, *English Language Development Guidebook, Chapter 4: Designing Effective Programs to Meet the Needs of Multilingual Learners*, (2022), https://www.cde.state.co.us/cde_english/eldguidebook2022chapter4.

The School had 39 staff members in the 2021-22 SY, 28 of whom had a Culturally and Linguistically Diverse Education (CLDE) endorsement, in addition to their Colorado teaching license. Similarly, the School has 38 staff members in the 2022-23 SY, 26 of whom have a CLDE endorsement, in addition to their Colorado teaching license. The Code of Colorado Regulations sets forth the requirements for obtaining a CLDE endorsement and explains that an educator of culturally and linguistically diverse student populations must:

- a) be knowledgeable about, understand and be able to apply the major theories, concepts and research related to language acquisition and language development, research-based literacy development, and culture, diversity and equity in order to support academic access and opportunity;
- b) understand and implement strategies and select materials to aid English language and content learning;
- c) be knowledgeable about, understand and be able to use progress monitoring in conjunction with formative and summative assessments to support student learning; and,
- d) self-assess the effectiveness of instruction based on the achievement of students and pursue the continuous professional development through appropriate activities, coursework and participation in relevant professional organizations.²

The Colorado Department of Education, the designated entity with authority to issue educator licenses and authorizations in Colorado, indicates on its website that a CLDE endorsement may be earned through either the completion of a Colorado-approved program or 24 semester hours of specific college level coursework.³

During evaluation interviews, the complainant(s) asserted that the School lacked sufficient staffing to provide ELD services to students in the non-biliteracy strand. Specifically, the complainant(s) explained that while the majority of staff are “certified,” they do not receive support to provide direct English language instruction and that there is ambiguity regarding which LAP is being implemented in the School (i.e., co-teaching, sheltered instruction, English as a second language, etc.). Further, the complainant(s) stated that sheltered instruction may occur in some classrooms, but that certain grade levels lacked qualified staff and were therefore not providing any ELD instruction to non-biliteracy ELs. The complainant(s) referenced a particular student from the 2021-22 school year who was placed in SWL, rather than the ELD block, but months later changed placement after the student’s parents were contacted. The complainant(s) did not provide the name of the student, but indicated that the SWL placement was inappropriate and that the student should have been initially placed in the ELD block.

While on-site, OCR interviewed nine School staff members, including: the Principal; an instructional coach; a teacher from each grade-level, beginning in kindergarten through fifth grade; and, an ELD interventionist. During the interviews, multiple staff emphasized the success of the non-biliteracy EL students. OCR learned that the median growth percentiles for non-

² 1 Colo. Code Regs. § 301-101:4.21.

³ Colorado Department of Education, *Culturally and Linguistically Diverse (CLD) Education (Grades K-12) Added Endorsement Content Evaluation Worksheet*, (December 17, 2021), <https://www.cde.state.co.us/cdeprof/cldaeworksheet>.

biliteracy students are higher than any other group of emerging bilingual students at the School. Multiple staff referred to the sheltered instruction strategies occurring in the classroom; however, when OCR inquired about how non-biliteracy EL students were receiving ELD instruction, many staff referenced the ELD block and did not specifically point to a literacy-based sheltered instructional program. In contrast, some of the staff members were direct about the type of programming offered by the School and clarified that the ELD block was intended as an additional support option, and not as the School’s primary method of implementing its LAP.

During the interviews, staff also explained to OCR, and in some instances confirmed, that a student who may be placed with a non-CLDE endorsed teacher receives push-in ELD services from a CLDE endorsed teacher during the literacy block.

OCR also learned that there was concern that the current XX grade non-biliteracy students were not appropriately placed or receiving additional ELD instruction. Specifically, staff shared that XX grade students were likely receiving the “same” instruction during the ELD block as they were in language arts (i.e., literacy-based sheltered instruction class). OCR learned that three of the four non-biliteracy students in XX grade have been formally identified as Gifted and Talented. OCR also learned the identity of the student referenced in the complainant(s)’s interview (Student A). Staff confirmed that Student A was initially placed in SWL, but was placed in the ELD block after a staff member contacted his parents later in the spring semester. Staff stated that Student A required significant support regarding language development throughout the 2021-22 SY.

Limited English Proficient Parent(s)/Guardian(s)

The complainant(s) also asserted during intake interviews that the School staff failed to ensure meaningful communication with LEP parents occurred due to a lack of available translation or interpretation resources. The complainant(s) clarified that Spanish-speaking LEP parents likely received adequate translation and interpretation services, but that it was likely not provided to non-Spanish speaking LEP parent(s)/guardian(s) because it was “too expensive” or due to a lack of availability. OCR learned during its on-site interviews that, based on LEP parent/guardian preference and discretion, School staff sometimes rely on mobile phone applications (i.e., WhatsApp, etc.) and online translation services (i.e., Google Translate) to communicate with non-Spanish speaking LEP parents. Additionally, OCR learned that in some in-person meetings, family members were utilized to provide interpretation services.

In response to OCR’s data request, the District explained its practice is to publish all “manuals, notices, handbooks and other documents” in both English and Spanish, as well as to provide translation and interpretation services to LEP parent(s)/guardian(s). It further explained that the School “regularly” communicates the District’s translation and interpretation services to parent(s)/guardian(s). Additionally, the District explained that it has transitioned from school-based coordination of translation and interpretation services to a new, centralized District Office of Translation and Interpretation (Office). OCR’s independent review of the District’s website

confirmed the existence of the Office and the provision of information to parent(s)/guardian(s) and District staff members regarding how to request translation and interpretation services.

III. Legal Standards

Language Assistance Program

Under Title VI, school districts must provide equal educational opportunity to EL students, including taking affirmative steps to address the language needs of EL students. When determining whether a school district's programs for EL students comply with the civil rights laws, OCR considers whether: (a) the educational theory underlying the LAP is recognized as sound by some experts in the field or is considered a legitimate experimental strategy; (b) the program and practices used by the school district are reasonably calculated to implement effectively the educational theory adopted by the district; and (c) the program succeeds, after a legitimate trial, in producing results indicating that students' language barriers are actually being overcome within a reasonable period of time. *See Castañeda v. Pickard*, 648 F. 2d 989, 1009-10 (5th Cir. 1981).

School districts must sufficiently staff and support the LAPs for EL students. School districts have an obligation to provide the personnel and resources necessary to effectively implement their chosen EL programs. This obligation includes having highly qualified teachers to provide language assistance services, trained administrators who can evaluate these teachers, and adequate and appropriate materials for the EL programs. At a minimum, every school district is responsible for ensuring that there is an adequate number of teachers to instruct EL students and that these teachers have mastered the skills necessary to effectively teach in the district's program for EL students.

Limited English Proficient Parent(s)/Guardian(s)

LEP parents are parents or guardians whose primary language is other than English and who have limited English proficiency in one of the four domains of language proficiency (speaking, listening, reading, or writing). School districts and state education agencies (SEAs) have an obligation to ensure meaningful communication with LEP parents in a language they can understand and to adequately notify LEP parents of information about any program, service, or activity of a school district or SEA that is called to the attention of non-LEP parents. SEAs and school districts must provide language assistance to LEP parents effectively with appropriate, competent staff – or appropriate and competent outside resources.⁴ School districts should ensure

⁴ Some school districts have used web-based automated translation to translate documents. Utilization of such services is appropriate only if the translated document accurately conveys the meaning of the source document, including accurately translating technical vocabulary. The Department of Education and the Department of Justice caution against the use of web-based automated translations; translations that are inaccurate are inconsistent with the school district's obligation to communicate effectively with LEP parents. Thus, to ensure that essential information has been accurately translated and conveys the meaning of the source document, the school district would need to have a machine translation reviewed, and edited as needed, by an individual qualified to do so. Additionally, the

that interpreters and translators have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue. In addition, school districts should ensure that interpreters and translators are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.

IV. Analysis

- a. Allegation #1: The District failed to provide EL students in the English-only program (non-biliteracy) with a language assistance program that is educationally sound and proven successful.

OCR found that the School is implementing a literacy-based sheltered instruction program and has a robust number of qualified staff members to deliver ELD services, as discussed in Section IV(b) below. However, based on OCR’s review of documentation available during the investigation, as well as the interviews OCR conducted, OCR identified concerns about the District’s compliance with Title VI as it pertains to the School’s messaging and staff understanding of its primary LAP, as well as the School’s placement decisions for non-biliteracy EL students. During an October 11, 2022, conversation with the District about OCR’s investigation to date, OCR discussed these compliance concerns with the District’s counsel.

Language Assistance Program – Staff Understanding

During interviews with staff, there was incongruence in the responses regarding how the delivery of ELD services for non-biliteracy EL students occurred. In response to OCR’s inquiry, many staff initially deferred to the School’s ELD block, rather than its literacy-based sheltered instruction. While interviewees often went on to describe the sheltered instruction strategies implemented throughout the day, it was not apparent to OCR that staff understood that the literacy-based sheltered instruction is the School’s primary LAP and the ELD block is an additional supportive measure.

Upon notification of the lack of clarity and consistency in staff members’ understanding of the School’s LAP, the District took immediate action to address OCR’s concerns. The District developed a memorandum (Memorandum) explaining the School’s model for delivering ELD services and distributed it staff. The District provided OCR a copy of the Memorandum, as well as the correspondence to staff. The Memorandum describes the School’s “ELD Program

confidentiality of documents may be lost when documents are uploaded without sufficient controls to a web-based translation service and stored in their databases. School districts using any web-based automated translation services for documents containing personally identifiable information from a student’s education record must ensure that disclosure to the web-based service complies with the requirements of the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g(b), and its implementing regulations at 34 C.F.R. Part 99. For more information on this issue, please review the ‘Protecting Student Privacy While Using Online Educational Services’ guidance found at: <https://studentprivacy.ed.gov/resources/protecting-student-privacy-while-using-online-educational-services-model-terms-service>.

Options,” including the biliteracy strand⁵ and sheltered immersion in literacy strand. The Memorandum explains that non-biliteracy students receive ELD services in the literacy-based sheltered instruction, with an optional ELD block that the parent(s)/guardian(s) may elect or the School may determine is appropriate on a student-by-student basis. It further notes that the sheltered immersion strategies are not limited to use during the course of the literacy block. The District provided a copy of the email by which the Principal distributed the Memorandum to School staff, which indicates that the staff will receive additional training regarding the ELD program options during professional development on November 9, 2022.

OCR contacted the complainant(s) to address concerns about the School’s qualified staff, as described below, and the complainant(s) raised concerns that non-biliteracy EL students participating in the ELD block with biliteracy students may detrimentally dilute the biliteracy program model. While OCR appreciates the information and concerns raised by the complainant(s), the concerns are akin to preferences within the ELD program and do not rise to potential compliance concerns.

Placement – Parent Letter

OCR also identified potential concerns regarding the Parent Letter. While OCR appreciates the information shared with parent(s)/guardian(s), as well as the inclusion of parent(s)/guardian(s) in the service decision, the Parent Letter does not initially establish or clarify the rights that the student(s) are entitled to under Title VI. Absent an explanation, the parent(s)/guardian(s) may lack the necessary information to make an informed selection. Further, if a student’s EL proficiency warrants the additional enrollment in the ELD block, it may not be appropriate to defer solely to the parent(s)/guardian(s) choice, as the placement should be reflective of the ELD needs of the student.

Following OCR’s notice regarding its concerns about the Parent Letter, the District revised the Parent Letter for any future use. The District provided a copy of the revised Parent Letter to OCR, which demonstrates that the District incorporated an explanation regarding Title VI and the requirement that the District “take affirmative steps to address language barriers so that students who are learning English may participate meaningfully in their schools’ educational program and services.” The revised Parent Letter includes a link to OCR’s website related to race and national origin discrimination. Finally, the revised Parent Letter incorporates an explanation that the School may determine the ELD block may be required for some EL students, in addition to the literacy-based sheltered instruction.

Based on the District’s responsive actions, OCR determined that the District addressed and resolved the compliance concerns related to the School staff members’ understanding, as discussed above, and the Parent Letter. Accordingly, OCR determined these compliance concerns are resolved and no longer appropriate for investigation.

⁵ The Memorandum also explains the School’s dual language strand, which the School intends to implement in pre-kindergarten and kindergarten in the 2023-24 SY and expanding into an additional grade each year thereafter.

Placement – Student A and XX Grade Non-biliteracy EL Students

OCR also noted potential placement concerns related to: Student A’s placement during the 2021-22 SY and XX grade non-biliteracy EL students during the 2022-23 SY. Specifically, OCR identified concerns that Student A, who is a non-biliteracy EL student, may have been placed in the SWL block, rather than the ELD block, during the 2021-22 SY despite having difficulty in increasing their EL proficiency. Further, interviews revealed concerns that the non-biliteracy EL students currently in XX grade may not be receiving the additional support necessary during the ELD block.

During OCR’s call with the District’s counsel on October 11, 2022, OCR discussed whether the remaining placement concerns in allegation #1 may be appropriately resolved through a voluntary resolution agreement, and the District expressed an interest in voluntarily resolving the allegation. The District confirmed its intention to resolve OCR’s remaining concerns through a voluntary resolution agreement by email on October 25, 2022. Pursuant to Section 302 of the CPM, a complaint may be resolved when, before the conclusion of an investigation, a recipient expresses an interest in resolving the complaint and when OCR has determined that identified concerns can be addressed through a voluntary resolution agreement.

The District voluntarily agreed to address OCR’s remaining concerns in allegation #1 by signing the enclosed Section 302 resolution agreement (Agreement) on October 31, 2022.

b. Allegation #2: The District failed to sufficiently staff and support the language assistance programs for EL students in the English-only program (non-biliteracy).

The complaint asserts that the School has insufficient staff who are qualified to deliver the LAP to non-Spanish speaking EL students. OCR found, however, that the School has more than an adequate number of staff to provide EL services as required in its LAP. While the assertions about staffing may be reflective of the lack of consistent messaging regarding the School’s LAP and how it is delivered, as addressed in allegation #1 above, OCR did not find that the School failed to adequately staff the LAP for its non-biliteracy EL students. On the contrary, OCR found that approximately 70% of the School’s staff are CLDE endorsed, demonstrating that there is a sufficient number of qualified staff to deliver the ELD services. OCR notes that a CLDE endorsed staff member, on their own, is insufficient to demonstrate that a recipient is satisfying the requirements under Title VI to provide ELD services to EL students. However, it is appropriate for the District to aspire to attract and retain CLDE endorsed staff who are qualified to implement its identified LAP.

Further, while the complainant(s) raised concerns about non-biliteracy EL students who are placed in a non-endorsed teacher’s classroom, OCR found that the School has protocols in place to ensure that the students receive ELD services from a CLDE endorsed staff member through placement in the appropriate literacy block and that, in the event the student’s teacher is not endorsed, through push-in services from an endorsed staff member.

OCR contacted the complainant(s) to inquire about the information provided by the District regarding the School's qualified staff, and the complainant(s) do not dispute that the School has sufficiently trained staff. Rather, the complainant(s) raised concerns regarding the perception that having a CDLE endorsement is equivalent to an ELD program. As noted above, CLDE endorsement is not in itself a sufficient approach to providing a sufficient LAP, as required by Title VI. However, in order to implement the LAP, the School must have a sufficient number of teachers who have mastered the skills necessary to effectively provide ELD services. OCR found that the School has retained a sufficient number of qualified staff, and the remaining concerns raised by the complainant(s) are addressed above.

Therefore, based on the foregoing, OCR determined that there is insufficient evidence to support a determination that the District failed to sufficiently staff and support the LAPs for non-biliteracy EL students.

c. Allegation #3: The District failed to ensure meaningful communication with LEP parents.

Under Section 110(d) of the CPM, OCR will dismiss an allegation when OCR obtains credible information indicating that the allegation has been resolved, and there is no systemic allegation(s).

In response to the information obtained during the course of OCR's investigation related to communication with LEP parents, OCR notified the District of concerns about its compliance with Title VI. Specifically, OCR explained that throughout the interviews conducted, it was apparent staff members sometimes utilized non-District approved mobile phone applications, online translation services, and family members to communicate with LEP parent(s)/guardian(s) and families. In accord with the information provided in the District's initial data response, the District reiterated that it has centralized the translation and interpretation services at the District level through its Office and upon receiving notification of OCR's concerns, the District immediately, and voluntarily, took steps to address OCR's concerns.

The District explained to OCR that it worked specifically with School staff to discontinue the use of any non-District approved methods for translating or interpreting communications with LEP parents. Further, the District provided a copy of the notice and explanation it issued in its Districtwide communication on October 28, 2022, which clarified that the District has "centralized and enhanced [its] translation and interpretation services" and directed staff to request services through the staff portal. Upon independently examining the District's website, OCR found that the District also provides information about translation and interpretation services on its District website and explains how to make a request, both as a parent/guardian or as a staff member.

Based on the foregoing information and documentation provided to OCR, OCR has determined that the District has taken steps to address this allegation and therefore the allegation is no longer appropriate for investigation. Accordingly, OCR is dismissing this allegation under Section 110(d) of the CPM as of the date of this letter.

V. Conclusion

As noted above, OCR found insufficient evidence to support a violation finding related allegation #2 and dismissed allegation #3 as resolved under Section 110(d) of the CPM. To fully resolve allegation #1, on October 26, 2022, OCR provided the District a proposed Agreement. The District submitted to OCR the signed Agreement (enclosed) on October 31, 2022.

When fully implemented, the Agreement will resolve the remaining allegation raised in this complaint. The provisions of the Agreement are aligned with the allegation and issues raised by the complainant(s) and the information that was obtained during OCR's investigation, and the provisions of the Agreement are consistent with the applicable statute and regulations. OCR will monitor the District's implementation of the Agreement until the District is in compliance with the statute and regulations at issue in the case. Failure to implement the Agreement could result in OCR reopening the complaint. OCR will promptly provide written notice of any deficiencies with respect to the implementation of the terms of the Agreement and will promptly require actions to address such deficiencies. If the District fails to implement the Agreement, we will take appropriate action, which may include enforcement actions.

OCR is closing the investigative phase of the case effective the date of this letter. The case is now in the monitoring phase. The monitoring phase of the case will be completed when OCR determines that the District has fulfilled all of the terms of the Agreement. When the monitoring phase of the case is complete, OCR will close case number 08-22-1378 and will send a letter to the complainant(s) and to the District stating that the case is closed.

The complainant(s) has a right to appeal OCR's determination regarding allegation #2 within 60 calendar days of the date indicated on this letter. In the appeal, the complainant(s) must explain why the factual information was incomplete or incorrect, the legal analysis was incorrect or the appropriate legal standard was not applied, and how correction of any error(s) would change the outcome of the case; failure to do so may result in dismissal of the appeal. If the complainant(s) appeals OCR's determination, OCR will forward a copy of the appeal form or written statement to the recipient. The recipient has the option to submit to OCR a response to the appeal. The recipient must submit any response within 14 calendar days of the date that OCR forwarded a copy of the appeal to the recipient

This letter sets forth OCR's determination in an individual 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 the District must not harass, coerce, intimidate, discriminate, or otherwise retaliate against an individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a retaliation complaint with OCR.

Please note the complainant(s) may have the right to file a private suit in Federal court whether or not OCR finds a violation.

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

OCR thanks the District for being willing to voluntarily address the allegations raised by the complaint. OCR appreciates the District's attention to this matter and looks forward to working with the District to meet the terms of the Agreement.

If you have any questions, please contact Colleen Brooks, one of the attorneys assigned to this case, at 303-844-0196 or Colleen.Brooks@ed.gov.

Sincerely,

/s/

Michael D. Todd
Supervisory Attorney

Attachment: Resolution Agreement

cc: Kathleen Sullivan
Legal Counsel
Boulder Valley School District RE-2
By email only to XX

Dr. Katy Anthes
Commissioner of Education
Colorado Department of Education
By email only to XX