

## VOLUNTARY RESOLUTION AGREEMENT

Washoe County School District (district) voluntarily agrees to take the following actions to resolve the allegations in a complaint (Reference No. 10171227) filed with the U.S. Department of Education (Department), Office for Civil Rights (OCR), under Title VI of the Civil Rights Act of 1964 (Title VI).

### **A. Review of Policies, Procedures and Practices**

#### Action Items

1. By January 13, 2018, the district will review and revise its policies, procedures, and practices (procedures) governing what documents the district will accept, for purposes of enrollment in the district, as suitable proof of a child's age and identity, to ensure that the district does not discriminate on the basis of national origin.
2. Within 30 days of receiving OCR's approval of the procedures, the district will implement them.

#### Reporting Requirements

1. By January 13, 2018, the district will submit to OCR for review and approval a draft of the proposed procedures developed in accordance with Action Item A.1. If OCR requires changes to the procedures, the district will re-submit the procedures to OCR for review and approval within 30 days of receiving notice of the revisions required by OCR. OCR and the district will follow the same process until OCR approves the procedures.
2. Within 60 days of receiving OCR's approval of the procedures, the district will provide documentation to OCR demonstrating its compliance with Action Item A.2.

### **B. Training**

#### Action Items

1. The district will prepare training materials for district staff that have responsibilities regarding the acceptance and processing of student enrollment documentation. The training will be on the district's revised procedures governing what documents the district will accept, for purposes of enrollment in the district, as suitable proof of a child's age and identity, to ensure that the district does not discriminate on the basis of national origin.

2. Within 45 days of receiving OCR's approval of the training materials, the district will provide the training to district staff that have responsibilities regarding the acceptance and processing of student enrollment documentation.

#### Reporting Requirements

1. By June 16, 2018, the district will submit to OCR for review and approval a draft of training materials developed in accordance with Action Item B.1. If OCR requires revisions to the training materials, the district will re-submit the training materials to OCR for review and approval within 30 days of receiving notice of the revisions required by OCR. OCR and the district will follow the same process until OCR approves the district's training materials.
2. Within 75 days of receiving OCR's approval of the district's training materials, the district will provide documentation to OCR demonstrating its compliance with Action Item B.2, including a copy of all training materials, the date of the training, a copy of the attendance sheet, and the name, title, and qualifications of the trainer.

### **C. Student-Specific Actions**

#### Action Items

1. By November 1, 2017, the district will prepare a letter to all students that attend, or attended, XXXXXXXXXXXXXXXX, and their families, that the district contacted during the 2016-2017 school year for purposes of requesting additional or alternate suitable proof of the student's age and identity for purposes of enrollment in the district. In the letter, the district will notify the student and his or her family of the district's revised procedures governing what documents the district will accept, for purposes of enrollment in the district, as suitable proof of a student's age and identity. The district will enclose a copy of the revised procedures with the letter. References to online content in the letter may be substituted for physical copies of the revised procedures pending reprinting of any materials.
2. By November 1, 2017, the district, in place of the letter required under Action Item C.1, will prepare a letter to the student at issue herein (the student) and her parent or guardian. In the letter, the district, in addition to including the contents of the letter required under Action Item C.1, will state that the student is welcome to re-enroll in the district, and that the student's Consular Report of Birth Abroad (CRBA) on file with the district constitutes suitable proof of the student's age and identity. The district will enclose a copy of the revised procedures with the letter. References to

online content in the letter may be substituted for physical copies of the revised procedures pending reprinting of any materials.

3. Within 30 days of receiving OCR's approval of the letters, the district will send the students and their families, and the student and her parent or guardian, respectively, the letters described under Action Items C.1 and C.2 by regular, first class U.S. mail.

#### Reporting Requirements

1. By November 1, 2017, the district will submit to OCR for review and approval its drafts of the letters described under Action Items C.1 and C.2. If OCR requires revisions to the letters, the district will re-submit the letters to OCR for review and approval within 30 days of receiving notice of the revisions required by OCR. OCR and the district will follow the same process until OCR approves the district's letters.
2. Within 60 days of receiving OCR's approval of the letters, the district will submit to OCR a copy of the letters sent to the students and their families, a list of students and families to whom the letters were sent, and proof of mailing.

#### **D. General Monitoring Principles**

1. The district understands that by signing this agreement, it agrees to provide OCR data and other information in a timely manner. Further, the district understands that during the monitoring of this agreement, OCR may visit the district campus, 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 the regulation implementing Title VI at 34 C.F.R. § 100.3. Upon completion of the obligations under this agreement, OCR shall close this case.
2. The district understands and acknowledges that, if it does not fully implement this agreement, OCR may initiate administrative enforcement or judicial proceedings, including 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, including 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.

Signed:

\_\_\_\_\_/s/\_\_\_\_\_  
Traci Davis  
Superintendent  
Washoe County School District

\_\_\_\_\_October 10. 2017\_\_\_\_\_  
Date