

**RESOLUTION AGREEMENT**  
**Arapahoe Charter School**  
**OCR Complaint No. 11-18-1428**

Arapahoe Charter School (the School) agrees to fully implement this Resolution Agreement (Agreement) to resolve the allegation investigated in Office for Civil Rights (OCR) Complaint No. 11-18-1428. This Agreement does not constitute an admission by the School of a violation of Title IX of the Education Amendments of 1972 (Title IX) or any other law enforced by OCR.

1. By March 27, 2020, the School will revise its Title IX policy and procedures (the Policy) to make clear how it will discharge its obligations under Title IX when a reporting party alleges harassing conduct that is also the subject of a criminal investigation, or that subsequently becomes the subject of a criminal investigation.

Reporting Requirement:

By April 3, 2020, the School will submit to OCR proof of the publication of the Policy as revised.

2. By March 27, 2020, the School will develop a written recordkeeping protocol for documenting sexual harassment complaints and investigations. The protocol will require School personnel to maintain certain information, which may include notes from witness interviews, documentation of investigative steps completed, a description of all interim and supportive measures offered to the reporting or responding party, investigative reports and written findings, notice of outcome, and records of any corrective action taken.

Reporting Requirement:

By April 3, 2020, the School will submit a copy of the recordkeeping protocol to OCR.

The School 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 the 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 and obligations of this Agreement. Upon the School's satisfaction of the commitments made under this Agreement, OCR will close this case.

The School understands and acknowledges that OCR may initiate proceedings to enforce the specific terms and obligations of this Agreement and/or the applicable statute(s) and regulation(s). Before initiating such proceedings, OCR will give the School written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

By: \_\_\_\_\_ Date: 2/13/20\_\_\_\_\_  
Name and Title