

**Howland Local School District  
Resolution Agreement  
OCR Docket #15-20-1248**

Howland Local School District (the District) voluntarily submits this Resolution Agreement (Agreement) to the U.S. Department of Education, Office for Civil Rights (OCR), for the purpose of resolving the above-referenced complaint and ensuring compliance with Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et seq.*, and its implementing regulation at 34 C.F.R. Part 106.

The District agrees to take the following actions:

1. By **December 31, 2022**, the District will draft written guidelines (the Guidelines) to ensure the District provides equivalent athletic opportunities for boys and girls in its high school athletics programs pertaining to:
  - a) the quality, amount, suitability, maintenance and replacement, and availability of equipment and supplies (uniforms and other apparel, sport-specific equipment, general equipment);
  - b) travel and per diem allowances (modes or methods of transportation, per diem allowance for athletes by team, size of squad/team and additional personnel who travel with the team, hotels); and
  - c) publicity (availability, quantity and quality of all District-sponsored publications and promotional materials and availability and quality of sports information personnel for each girls' and boys' athletic program). It is understood that this provision does not apply to independent actions of non-District-sponsored publications such as local newspapers, local newsletters, or other communications sent out by local journalists, and/or individuals and non-District staff who are not authorized to speak on behalf of the District, but applies to District efforts to generate public interest and media demand.

To develop the Guidelines, the District will complete a comprehensive equity assessment of its boys' and girls' athletics programs in areas (a), (b), and (c) at the high school. The assessment will include, at a minimum, a review of District records (e.g., budget documents, purchase orders), interviews of relevant administrators and coaches, a survey issued to high school student athletes where appropriate, and a review of the benefits and opportunities provided to student athletes through District-approved booster clubs and other outside entities (i.e., individuals and organizations that donate money or provide equipment to the District for its athletic programs).

**Reporting Requirement:** By **December 31, 2022**, the District will provide OCR, for OCR's approval, with the draft Guidelines and a report on the assessment conducted pursuant to Item 1. The report will include: a list of the individuals involved in the assessment process; a description of non-documentary information considered; a copy of

any documents relied upon in the process; a copy of any survey responses; the results of the assessment; and timeframes for any necessary changes resulting from the assessment to ensure that student athletes are provided with equivalent benefits and services in each of the three areas (equipment and supplies, travel and per diem allowances, publicity) in compliance with the requirements of Title IX.

2. Within 30 days of OCR's approval of the Guidelines and assessment report, the District will begin to implement the Guidelines and make any necessary changes resulting from the assessment.

**Reporting Requirement:** The District will provide OCR with documentation showing the District's progress in implementation of the Guidelines and any changes within 90 days of receiving OCR's approval. The District will submit a second progress report within 180 days of receiving OCR's approval.

3. Within 30 days of OCR's approval of the District's Guidelines, the District will convene a meeting of key personnel, including the superintendent, athletic/activities director, Title IX coordinator, high school principal, and all coaches of high school interscholastic teams and club teams, to discuss the Guidelines, the District's general responsibilities under Title IX, and Title IX's application to athletics, including how funding from any source (e.g. booster clubs) can affect the balance of equivalent benefits and services for male and female athletes. The meeting should be conducted by an individual(s) knowledgeable about Title IX.

**Reporting Requirement:** Within 30 days after the meeting described in Item 3, the District will provide OCR with documentation that includes the date(s) of the meeting(s); copies of the agenda and any training materials distributed; the name and qualifications of the person(s) who conducted the meeting; and a copy of the sign-in sheets of attendees, indicating name and job title.

## **General Requirements**

The District understands and acknowledges that OCR may initiate proceedings to enforce the specific terms and obligations of the Agreement and/or Title IX. Before initiating such proceedings, OCR will give the District written notice of the alleged breach and 60 calendar days to cure the alleged breach.

The District understands that OCR will not close the monitoring of this Agreement until OCR determines that the District has demonstrated compliance with all the terms of this Agreement and is in compliance with Title IX, which was at issue in this complaint.

The Agreement will become effective immediately upon the signature of the District's representative below.

/s/

09/30/2022

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Superintendent or Designee

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Date