



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

400 MARYLAND AVENUE, SW
WASHINGTON, DC 20202-1475

REGION XI
NORTH CAROLINA
SOUTH CAROLINA
VIRGINIA
WASHINGTON, D.C.

March 12, 2015

Mary Griffin
School Administrator
Magellan Charter School
9324 Baileywick Road
Raleigh, NC 27615

Re: OCR Complaint No. 11-14-1058
Letter of Finding

Dear Ms. Griffin:

This letter is to inform you of the outcome of the above-referenced complaint filed with the District of Columbia Office for Civil Rights (OCR), within the U.S. Department of Education (the Department), on December 4, 2013, against the Magellan Charter School (the School). Although the Complainant did not specifically name the North Carolina State Board of Education (the State Board) as a party, OCR determined that the State Board is a necessary party to resolve the allegations in the complaint. Therefore, OCR opened a separate complaint (OCR Complaint No. 11-14-1100) against the State Board. The Complainant filed the complaint on behalf of her son (the Student), alleging the School discriminated against him on the basis of sex and disability by:

Allegation 1: Failing to promptly and equitably respond to complaints of peer, verbal harassment based on sex;¹

Allegation 2: Discriminated against the Student based on disability (Attention Deficient Hyperactivity Disorder (ADHD)) by improperly requiring the Student to undergo a mental health evaluation before permitting him to return to the School following the incident in Allegation 1; and

Allegation 3: Denying the Student a free appropriate public education (FAPE) by failing to properly administer the Student's medication (Risperdal) during school hours over the course of the 2013-14 school year.

During the course of its investigation, OCR reviewed documentation received from the Complainant and the School, including information obtained during interviews with School personnel. After carefully reviewing all of the available evidence, OCR finds that there is insufficient evidence to

¹ OCR consolidated Allegations 1-4 from the notification letter into Allegation 1. The same issues listed in Allegations 1-4 have been investigated and discussed below.

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

support a finding with regard to the allegations above. However, OCR did identify compliance concerns with regard to the School's Notice of Nondiscrimination and Title IX and Section 504 grievance procedures. A discussion of OCR's investigation and findings follows below.

Legal Standards

OCR enforces Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 et seq. (Title IX) and its implementing regulation at 34 C.F.R. Part 106. Title IX prohibits discrimination on the basis of sex in any education program or activity operated by a recipient of Federal Financial Assistance. OCR is also responsible for enforcing Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation, at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability in programs and activities that receive Federal Financial Assistance from the Department. OCR also enforces Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. § 12131 et seq., and its implementing regulation, at 28 C.F.R. Part 35, which prohibit discrimination against qualified individuals with disabilities by public entities, including public educational systems, regardless of whether they receive Federal financial assistance from the Department. Because the School receives Federal financial assistance from the Department and is a public entity, OCR has jurisdiction over it pursuant to Section 504, Title II, and Title IX.

Allegation 1

Title IX does not prohibit discrimination based solely on sexual orientation, but does prohibit discrimination on the basis of sex, including gender stereotyping. Harassment of a student on the basis of sex, including gender stereotyping, can result in the denial or limitation of the student's ability to participate in or receive education benefits, services, or opportunities. In determining whether a hostile environment based on sex has been created, OCR evaluates whether the conduct was sufficiently serious to deny or limit the student's ability to participate in or benefit from the school's program. OCR examines all the circumstances, including: the type of harassment (e.g., whether it was verbal or physical); the frequency and severity of the conduct; the age, sex and relationship of the parties; the setting and context in which the harassment occurred; whether other incidents have occurred at the school; and other relevant factors.

Once a school has notice of possible sexual harassment of a student by another student it is responsible for determining what occurred and responding appropriately. The school is not responsible for the actions of the alleged harasser, but rather for its own discrimination should it fail to respond immediately and appropriately. A school violates Title IX if: (1) the harassing conduct is sufficiently serious to deny or limit the student's ability to participate in or benefit from the educational program; (2) the school knew or reasonably should have known about the harassment; and (3) the school fails to take appropriate responsive action. These steps are the school's responsibility regardless of whether the student who was harassed makes a complaint.

OCR evaluates the appropriateness of the responsive action by assessing whether it was prompt and effective. What constitutes a reasonable response to harassment will differ depending upon the circumstances. However, in all cases the school must conduct a prompt, thorough and impartial inquiry designed to reliably determine what occurred. If harassment is found, the school should take reasonable, timely, age-appropriate, and effective corrective action, including steps tailored to the specific situation. The response must be designed to stop the harassment, eliminate the hostile environment, and address the effects of the harassment. If, upon notice, the school has failed to take

prompt and effective corrective action, it must remedy the effects on the victim that could reasonably have been prevented had the school responded promptly and effectively. The school must also take steps reasonably calculated to prevent the harassment from recurring, including disciplining the harasser where appropriate. A series of escalating consequences may be necessary if the initial steps are ineffective in stopping the harassment.

The Complainant alleged that the Student was subjected to unwelcome conduct by his peers based on his sex.² Specifically, the Complainant claimed that other students in the Student's class called him "Gay-vin" instead of Gavin, and made other comments about his physical stature and hair length; insinuating that he was a homosexual. According to the Complainant, this occurred on several occasions. The Complainant indicated to OCR that she informed a teacher at the School of the alleged harassment via email prior to the November 14, 2013 incident (discussed below in Allegation 2). However, the Complainant was unable to produce a copy of the email or the name of the teacher to whom she reported the behavior. OCR made repeated attempts to obtain this information from the Complainant over the phone, and followed up with a request via email on September 3, 2014. To date, the Complainant has not responded to OCR's request. However, OCR obtained documentation from the School, including statements made by the Student, the Complainant, and the students accused of the name-calling, which confirmed that the Student had been called "Gay-vin" by his peers. Several of the students involved, including the Student, also confirmed that the Student had been called "short" and told that his house was small. All of the documentation obtained by OCR memorialized interviews and conversations (including telephone conversations with the Complainant) that took place after November 14, 2013. The majority of these documents arose from the School Administrator's investigation of the claims by the Student and the Complainant that the Student's peers teased the Student by calling him "Gay-vin" instead of Gavin.

During her interview with OCR, the School Administrator indicated that the first time she was made aware of the Complainant's concerns regarding comments made by other students was during the investigation of a November 2013 incident where the Student threatened to kill his teacher. According to the School Administrator, she interviewed the Complainant regarding the November incident and the Complainant indicated that she had previously complained to a teacher that the Student was being called names by his peers. However, the Complainant refused to provide the School Administrator with the name of the teacher or any other evidence of her earlier communications. The School submitted to OCR e-mail communications between the School Administrator and the Complainant on November 26, 2013 and December 6, 2013 where the School Administrator made subsequent requests for the information regarding the complaint made to the teacher. OCR has obtained no evidence that this information was ever provided by the Complainant. Other School personnel also informed OCR that they never received knowledge of the Complainant's concerns prior to the investigation of the November incident.

Because OCR was unable to corroborate the Complainant's claim that she made her concerns known to a teacher at the School prior to the November incident, OCR could not substantiate that the School knew or should have known about the alleged harassment. OCR could only confirm that the School was aware of the Student being called "Gay-vin" by his peers, which, without more, indicates at most

² The Complainant filed a complaint with the North Carolina Department of Public Instruction (NC DPI) in which she alleged that the Student was denied a free appropriate public education (FAPE) because of the bullying and harassment. NC DPI found the District to be in compliance on that issue.

conduct based on sexual orientation, not gender identity or sex. Additionally, the Complainant stated as much in an email to the School Administrator on November 17, 2013 where she categorized the conduct as “sexual orientation bullying.” The remaining comments, that the Student was “short” and that he had a “small house” also do not indicate conduct based on the Student’s gender identity or sex. Additionally, the evidence gathered by OCR indicates that the School took corrective action with regard to the comments made by the Student’s peers immediately after learning of them. Specifically, the School Administrator met with each of the students, as well as with the faculty and staff who witnessed the incident. Each student found responsible for referring to the Student as “Gay-vin” was required to write a letter of apology, which they all did and delivered to the Student. In addition, the notes the School provided in response to OCR’s data request indicate that the Student’s teachers discussed how to monitor the Student’s interaction with his peers upon his return to the School and in fact did follow up with him, observing his interactions with his peers.

OCR finds insufficient evidence that the School knew or reasonably should have reasonably known about any harassment based on the Student’s gender identity or sex as protected by Title IX. Additionally, there is no evidence that the School was or should have been aware of the fact that the Student’s peers referred to him as “Gay-vin” prior to learning of the name-calling during the investigation of the November incident, at which point the School responded promptly and appropriately.³ Because the conduct confirmed by OCR does not amount to harassment based on the Student’s gender identity or sex, OCR finds that there is insufficient evidence to conclude that the School failed to appropriately respond to complaints of peer, verbal harassment based on sex.

Allegation 2

While Title II prohibits discrimination against qualified individuals with disabilities by public entities, it does not require a public entity to permit an individual to participate in or benefit from the services, programs, or activities of that public entity when that individual poses a direct threat to the health or safety of others. According to the Title II regulation, at 28 C.F.R. Part 35.139, in determining whether an individual poses a direct threat to the health or safety of others, a school must make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence, to ascertain: the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices, or procedures or the provision of auxiliary aids or services will mitigate the risk.

During the 2013-2014 school year, the Student was a seventh grader with a disability who received services under an individualized education program (IEP) at the School. He was suspended and referred for a risk assessment after an incident on November 14, 2013 (the incident) where he threatened to kill a teacher and later made threats to his peers after they reported his conduct to the recess coordinator. During her interview with OCR, the Student’s Math Teacher indicated that she held the Student back from recess in order to have him finish an academic assignment. The Math Teacher noted that the Student seemed upset about having to stay in to complete his work. Once the assignment was done, the Student went outside for recess. At this time, the Student began stabbing a tomato with a stick and uttering threats against the Math Teacher. The Recess Coordinator told OCR

³ The Complainant told OCR that another student told her that the Principal had directed the student to “poll” other students in the class to find out who had called the Student names and to tell them not to do it anymore. The Principal denied having done so. OCR reviewed records of the School’s interviews with other students and found no indication that any student had been directed to take a poll of his peers or to speak with them regarding name calling.

staff that several students ran up to her during recess and told her that the Student had threatened to kill the Math Teacher. At that point, the Recess Coordinator escorted the Student to the School Administrator's office. On their way to the office, the Recess Coordinator and the Student passed the group of students who informed her about the Student's threatening behavior. The Recess Coordinator reports that she witnessed the Student mouth "you're dead" to the students as they walked by.

The School Administrator conducted an investigation of the incident and determined that the Student made threats against the Math Teacher and his peers. The Student was suspended, and referred for a risk assessment. The Complainant alleged that the School discriminated against the Student based on disability when it required that he undergo a mental health evaluation prior to returning to school after the incident.

During interviews with OCR staff, the School Administrator stated that the risk assessment she required the Student to undergo prior to returning to the School had nothing to do with his disability and his disability was not a factor in making the decision to require the assessment. Instead, the School Administrator indicated that whenever a threat is made against a student or staff and the investigation determines that the target of the threat has perceived the threat as credible, the student who makes the threat is required to undergo an assessment strictly to determine whether the threat made is credible for school safety purposes. The School Administrator spoke with the Math Teacher and her husband, who both indicated that they were very concerned about the threat made by the Student and did not think it was safe for the Math Teacher to return to the School until the School determined whether the threat was credible. The School Administrator noted that this has not happened often and she could only recall two instances where other students were required to undergo risk assessments in the past. In each of those instances, the student involved threatened to commit suicide and the threat was found not credible by the assessor within a few days.

However, in an e-mail dated November 19, 2013, the School Administrator stated to the Complainant that while the Student's disability diagnosis was not a basis for the decision to require the risk assessment, "it certainly is a factor in validating the need for additional information from an expert." OCR reviewed documentation provided by the School regarding threats made against students and staff and found that on at least one occasion, a student who similarly made a threat against a teacher by pretending to be another student in her class in an online forum was suspended, but not required to undergo a risk assessment, despite the serious nature of the threat and the fact that the target of the threat perceived it as credible.⁴ For these reasons, OCR found some evidence that the School considered the Student's mental health diagnosis in requiring the Student to undergo a threat assessment.

OCR then considered whether the School properly conducted a direct threat analysis, as outlined under Title II. As mentioned earlier, in determining whether an individual poses a direct threat to the health or safety of others, a school must make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence, to ascertain: the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices, or procedures or the provision of auxiliary aids or services will mitigate the risk. A review of the evidence gathered during OCR's investigation confirms that the School made an individualized assessment based on current medical knowledge.

⁴ In this case, the student posed as one of her peers and threatened to send the teacher "to hell" in a profanity-laced message.

As mentioned above, the School received information from the Student's peers, the Math Teacher, and her husband that there were concerns that the Student made a serious threat to physically harm his peers and his teacher. The School scheduled a meeting between the Complainant, Student and an outside psychologist in order to complete a risk assessment at no cost to the Complainant and in a timely manner. The Complainant declined the offer, stating instead that she would have the Student evaluated by a psychiatrist who was knowledgeable about the Student's medication regiment as well as his disability. The School agreed, and offered to pay up to \$1,500 to cover the assessment.⁵ In an email to the Complainant dated November 26, 2013, the School Administrator provided a list of items the School wanted the individual conducting the risk assessment to include in making their decision as to whether the threat was credible. The list included the following items: 1) the Student's motive(s) and goal(s) in making the threat; 2) whether there has been any communication with anyone suggesting ideas or intent to carry out the threat; 3) whether the Student shows inappropriate interest in school attacks, weapons, or incidents of violence; 4) whether the Student engaged in attack related behaviors such as developing a plan, making efforts to acquire weapons, or acting out an attack; 5) whether the Student has the capacity to carry out an act of targeted violence; 6) what, if any, recommendations does the assessor have for ensuring that the Student does not carry out any such threat, etc. On December 10, 2013, the School was provided with a note from the assessing physician indicating that the Student "does not pose a threat to himself or others" and that he was cleared to return to the School as soon as possible. The School admitted him back to the School immediately.

The School also held a manifestation determination meeting on December 6, 2013, at which point it was determined that the Student's behavior was not a manifestation of his disability. The information considered included all relevant assessments, class observations from teachers, medical information, including medical diagnosis and medication, as well as discipline reports. The manifestation determination documentation also noted that the information showed that the Student's IEP had been properly implemented at the time. Based on its review of the totality of the information gathered by the School in response to the incident, and specifically regarding the threats made by the Student, OCR concludes that the School's assessment was individualized and sufficient to ascertain the nature, severity and duration of the risk; the probability that the potential injury would actually occur; and whether reasonable modifications could mitigate the risk. Therefore, OCR finds insufficient evidence to substantiate the allegation that the School discriminated against the Student based on his disability by requiring that he undergo a risk assessment.

Allegation 3

The regulation implementing Section 504 requires charter schools to provide qualified students with disabilities a free appropriate public education (FAPE), defined as the provision of regular or special education and related aids and services that are designed to meet individual educational needs of students with disabilities as adequately as it meets the needs of students without disabilities. 34 C.F.R. § 104.33(a). OCR interprets the Title II regulations to require charter schools to provide a FAPE to the same extent required under the Section 504 regulations. OCR interprets these provisions to require that school districts take necessary steps to ensure that they meet the disability-related needs of

⁵ In her complaint, the Complainant stated that NC DPI's website states that a school may not cap the amount of money paid for required assessments. The laws enforced by OCR do not specifically address the costs of private or independent evaluations. In any event, the Complainant provided no information to OCR indicating that she paid in excess of \$1,500.

students. The development and implementation of an IEP or other plan designed to meet the needs of a student with a disability is one means by which school districts may provide a FAPE.

The Complaint alleged that the School did not provide the Student with his medication during school hours as required by his physician. The Student's IEP in place at the time indicates that the team did not have any information indicating a need to provide the Student with administration of medication. As a result, OCR finds insufficient evidence that the School had an obligation to provide him with medication.

OCR then considered whether the School had any other obligation to provide to provide the Student with medication. During an interview with OCR staff, the School Administrator noted that the process for having medication administered to a student requires the parent/guardian to provide the office manager with a physician's note or prescription and the medication to be administered. The documentation should include the amount and time(s) the medication is to be administered to the student. At that point, the nurse will administer the medication and the office secretary keeps a log of each time the medicine is given. Documentation provided by the School describes an alternative to this process for medication that is to be administered in the short term. The School's process defines "short term" as a period not to exceed ten days. In those cases, the office manager will accept the prescription pill bottle or a note from the physician as the necessary documentation for administration of medication to the student.

In the case of the Student, the Complainant provided the Office Manager with medication that was administered under the short term process in October 2013. The School Administrator notes that she was first informed that the Student was not receiving his medication by the Complainant on November 14, 2013, when the Complainant met with the School Administrator to discuss the incident with his peers. At that point, the Complainant informed the School Administrator that the Student had not been receiving his medication for a period of three weeks. The School Administrator explained that the previous medication was provided under the short term process and stated the need for the Complainant to provide medical documentation and fill out the medication form if additional medication was to be administered. Notes from the Office Manager indicate that the Complainant returned the following day and stated that the Student's physician decided to discontinue the medication as it was not proving beneficial to the Student. The School Administrator told OCR that the Complainant had not provided any documentation from a physician for the administration of medication to the Student on a long term basis and has not done so since her conversation with the Office Manager on November 15, 2014. The Complainant indicated to the School Administrator that she sent medication to the School with the Student for him to deliver to the Office Manager and that she personally spoke with an office volunteer to see if the medication had been delivered. When the volunteer noted that no medication had been brought to the office for the Student, the Complainant asked the volunteer to find the Student and deliver the medication. The Complainant could not identify the volunteer with whom she spoke. The School Administrator indicated to OCR that she spoke with all of the School's office volunteers and could not confirm that this conversation took place.

The School Administrator noted that the Complainant had provided appropriate documentation and submitted medicine to the office in accordance with School procedures in the past and that in those instances, the medications were administered to the Student as directed by the prescribing physician. OCR confirmed that the process, as outlined by the School Administrator, is included in the student handbook, which is provided to all students and available on the School's website.

OCR found insufficient evidence that the School had an obligation to provide the Student with medication, as alleged. After all, the Student's IEP does not require the School to administer medication to the Student and OCR cannot confirm that the School received any notice that the Student was to receive additional medication during the school day. Therefore, there is insufficient evidence to support an allegation that the School discriminated against the Student on the basis of his disability by failing to administer medication during the 2013-2014 school year.

Grievance Procedures

During the course of its investigation, OCR found a violation with the School's Title IX and Section 504 grievance procedures, as well as with the School's Notice of Nondiscrimination.

Notice of Nondiscrimination

The Section 504 regulation at 34 C.F.R. § 104.8 and the Title IX regulation at 34 C.F.R. §106.9 require that recipients publish a notice of nondiscrimination that states that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated to coordinate compliance with Section 504 and Title IX. Pursuant to Section 504 and Title IX, the notice must specify the bases for non-discrimination and identify the name or title, address, and telephone number of the School personnel who coordinate the School's complaint with these regulations (i.e., the Title IX and Section 504 Coordinators). OCR found that the School is not in compliance with the Section 504 and Title IX regulations with regard to its notice of nondiscrimination. Specifically, the statement does not include any reference to or contact information of the Title IX and Section 504 Coordinators.

Section 504 grievance procedures

The regulation implementing Section 504, at 34 C.F.R. § 104.7, requires a recipient that employs fifteen or more persons to adopt grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints. When evaluating a recipient's Section 504 grievance process, OCR considers a number of factors, including whether the procedure provides for: 1) clear notice of how, when, and where to file a complaint; 2) a thorough and objective investigation of complaints, including the opportunity to present evidence; 3) designated and reasonably prompt timeframes for the major stages of the complaint process; 4) notice to the parties of the outcome of the complaint; and 5) appropriate due process. OCR reviewed the School's Section 504 grievance procedures and found that they do not clearly provide for a thorough and objective investigation of complaints. In particular, the procedures require a conference with the principal as the first step of the process, without any alternative should the principal's actions be the subject of the complaint; the procedures also do not include any information regarding the investigation of complaints or the ability to present evidence. For these reasons, OCR finds that the School is not in compliance with the Section 504 regulations with regard to its grievance procedures.

Title IX grievance procedures

Additionally, OCR identified concerns with the School's Title IX grievance procedures. The Title IX regulations, at 34 C.F.R. § 106.8, require schools to designate at least one employee to coordinate its efforts to comply with and implement Title IX, including the investigation of complaints alleging sex

discrimination. The School is required to notify all its students and employees of the contact information of the employee or employees appointed as the Title IX Coordinator. The Title IX regulations also require schools to adopt and publish a policy against sex discrimination and grievance procedures providing for prompt and equitable resolution of complaints of discrimination on the basis of sex. 34 C.F.R. § 106.8(b). OCR has identified a number of elements in evaluating whether a school's grievance procedures are prompt and equitable, including at a minimum:

- whether the procedures provide for notice to students, parents, and employees of the procedure, including where complaints may be filed;
- application of the procedure of complaints alleging harassment carried out by employees, other students, or third parties;
- adequate, reliable, and impartial investigation of complaints, including the opportunity to present witnesses and other evidence;
- designated and reasonably prompt timeframes for the major stages of the complaint process;
- written notice to the parties of the outcome of the complaint; and
- an assurance that the school will take steps to prevent recurrence of any harassment and to correct its discriminatory effects on the complainant and others, if appropriate.

OCR finds the School's grievance procedures to be deficient. In reviewing the Student/Parent Handbook (the Handbook), the School's Code of Conduct simply states that certain infractions, including sexual assault and sexual harassment, may be referred to the appropriate law enforcement body and that the School will cooperate with law enforcement. The Handbook also states that internal disciplinary investigations will take place separately from any criminal investigation. The School does have general "grievance procedures." Those procedures state that they may be used to "appeal any final decision of any Magellan Charter School personnel." However, they do not indicate that they apply to harassment carried out by employees, other students, or third parties. Like the 504 grievance procedures, they do not clearly provide for a thorough and objective investigation of complaints in that they also require a conference with the principal as the first step of the process, without any alternative should the principal's actions be the subject of the complaint and they also do not include any information regarding the investigation of complaints or the ability to present evidence. The procedures also lack an assurance that the school will take steps to prevent recurrence of any harassment and to correct its discriminatory effects on the complainant and others, if appropriate. Because the School's procedures do not include the elements listed above, OCR found that the School is not in compliance with the Title IX regulations with regard to its grievance procedures. The School and OCR entered into the attached Resolution Agreement, which, when fully implemented, will resolve OCR's concerns regarding the Notice of Nondiscrimination and grievance procedures. OCR will monitor the School's compliance with the Agreement.

This concludes OCR's investigation of the complaint. This letter should not be interpreted to address the School's compliance with any other regulatory provision or to address any issues other than those addressed in this letter. This letter sets forth OCR's determination in an individual OCR 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. The complainant may have the right to file a private suit in federal court whether or not OCR finds a violation.

We have advised the Complainant that the School may not retaliate against an individual who asserts a right or privilege under a law enforced by OCR or who files a complaint, testifies, or participates in an

OCR proceeding. If this happens, the individual may file a retaliation complaint with OCR. Also, under the Freedom of Information Act, 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, personal information that, if released, could constitute an unwarranted invasion of privacy.

If you have any questions, feel free to contact Sebastian Amar, at 202-453-6023 or sebastian.amar@ed.gov.

Sincerely,

/S/

Kay Bhagat
Team Leader, Team III
District of Columbia Office
Office for Civil Rights

Enclosure(s)