



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS, REGION XV

1350 EUCLID AVENUE, SUITE 325
CLEVELAND, OH 44115

REGION XV
MICHIGAN
OHIO

September 30, 2015

XXXXXXXX XXXXXXXX XXXX XXX
Walter Haverfield, LLP
The Tower at Erieview
1301 East 9th Street, Suite 3500
Cleveland, Ohio 44114-1821

Re: OCR Docket #15-15-1034

Dear xx xxxx:

This letter is to notify you of the disposition of the complaint filed on October 24, 2014, with the U.S. Department of Education's Office for Civil Rights (OCR) against the Rocky River City School District (the District). The complaint alleged that the District discriminated against a student (the Student) on the basis of disability (xxxxxxxxxx xxxxxxxxxxxx and xxxxx xxxxxxxxxxxx). Specifically, the complaint alleged that the District (1) failed to effectively communicate with the Student on xxxxxxxx xx, 2014, when the xxxxxxxxxxxx failed to provide the Student with xxxxxxxx discipline materials in a xxxx or xxxx that was xxxxx xxxxxxxx for xxx to xxxx and failed to xxxxxxxx the materials to xxx; and (2) failed to address the Student's xxxxxxxx xxxxxxxx xx, 2014, complaint that the Student was subjected to disability discrimination when the xxxxxxxxxxxx required the Student to xxxx a xxxxxxxxxxxx xxxxx xxxxxxxxxxxx in a xxxx xxx could not xxxxx, and without her parent being present.

OCR is responsible for enforcing Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, and its implementing regulation, 34 C.F.R. Part 104 (Section 504). Section 504 prohibits discrimination on the basis of disability by recipients of Federal financial assistance from the U.S. Department of Education (the Department). OCR is also responsible for enforcing Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131 *et seq.*, and its implementing regulation, 28 C.F.R. Part 35 (Title II). Title II prohibits discrimination on the basis of disability by public entities. As a recipient of Federal financial assistance from the Department and as a public entity, the District is subject to these laws; therefore, OCR had jurisdiction to investigate this complaint.

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Based on the complaint allegations, OCR investigated whether the District failed to take appropriate steps to ensure that its communications with a student with a disability were as effective as its communications with others, in violation of the Title II implementing regulation at 28 C.F.R. § 35.160(a); and whether the District has adopted grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging discrimination on the basis of disability, as required by the Section 504 implementing regulation at 34 C.F.R. § 104.7(b) and the Title II implementing regulation at 28 C.F.R. § 35.107(b).

During the course of OCR’s investigation, OCR reviewed documents provided by the Student’s parent and the District. Additionally, OCR interviewed District staff with knowledge of the facts serving as the basis for the complaint, the Student, and the Student’s parent. Finally, OCR provided the Student’s parent with an opportunity to respond to information submitted by the District.

After a careful review of the information obtained during the investigation, OCR finds that the evidence is insufficient evidence to conclude that the District discriminated against the Student in violation of Section 504 and Title II with respect to the xxxxxxx xxx discipline communication, as alleged. OCR also finds that the District failed to treat the Student’s parent’s xxxxxxx xxx complaint as a complaint of disability discrimination, although it took action to address the complaint. Finally, OCR has determined that the District has failed to adopt grievance procedures that fully incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging discrimination on the basis of disability, as required by the Section 504 implementing regulation at 34 C.F.R. § 104.7(b) and the Title II implementing regulation at 28 C.F.R. § 35.107(b). The bases for OCR’s determinations are set forth below.

Background

[x---paragraph redacted---x]

[x---paragraph redacted---x]

Alleged Failure to Effectively Communicate with the Student

- **Applicable Legal and Policy Standards**

The Title II implementing regulation, at 28 C.F.R. § 35.160(a), requires that public entities take appropriate steps to ensure that communications with persons with disabilities are as effective as communications with others. The Title II regulation requires that the type of auxiliary aid or service necessary to ensure effective communication vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place; and that, in order to be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner,

and in such a way as to protect the privacy and independence of the individual with a disability. The regulation further states that, in determining what types of auxiliary aids and services are necessary, a public entity shall give primary consideration to the requests of individuals with disabilities. 28 C.F.R. § 35.160(b)(2).

Title II's effective communication requirement applies to all of a student's school-related communications. The auxiliary aid or service provided must allow the individual with a disability to access the information presented. For example, a blind student's textbooks and handouts must be accessible for that student, and all written information used in the classroom should also be read aloud or presented in other accessible formats. Parents do not have to make a specific request for different or additional auxiliary aids to ensure effective communication. More specifically, when the school district knows that a student needs assistance with communication because, for example, he or she has a vision disability, the school district has an affirmative obligation to provide effective communication under Title II, whether or not a parent requests specific auxiliary aids and services under Title II. Further, even if a district is fully implementing the auxiliary aids and services for a vision impairment pursuant to a student's Section 504 plan, that may not be sufficient to satisfy the district's obligations pursuant to Title II if those auxiliary aids and services are not sufficient to ensure the district's communications with the student are as effective as its communications with others. School districts must be mindful that the types of auxiliary aids and services required for effective communication will depend on the particular circumstances and are encouraged to reassess the effectiveness of communication regularly as the situation changes.

- **Summary of OCR's Investigation**

[x--- paragraph redacted---x]

OCR examined a copy of the Notice that the District indicated was provided to the Student. The Notice was a typed form, but had blank sections which were filled in with handwriting. The print on the Notice form was not enlarged. The Notice contained an out-of-school suspension box, which was checked. Beside the box, the principal had handwritten that a two-day suspension was being held in abeyance. The Notice also contained a section entitled "the reason(s) you may be suspended." This section contained a handwritten description of the xxxxxx incident. The Notice also contained a space for the student conduct code provision that had been violated. This section had also been filled in by hand. The Notice further stated: "You are meeting in an informal hearing to be made aware of the charges against you, ask questions and tell your side of what happened and question the reasons for your possible suspension." Below this statement was a signature line for the principal, followed by the statement "I have received a copy of the Notice of Intended Suspension," which was followed by a signature line for the Student and a witness. The principal, a witness, and the Student had all signed the form.

OCR interviewed the principal, who acknowledged being on the Student's Section 504 team, signing the Student's Section 504 plan, and being familiar with xxx xxxxxx

xxxxxxxx and the requirements of xxx Section 504 plan. He stated that xxxxxxx xxxxxx was only part of the Student's Section 504 plan with respect to assessments (i.e., tests), and the Section 504 plan also called for providing the Student with xxxxxxx xxxxxxxxxxx (which are things such as cards, blocks, triangles, or squares that students may use to demonstrate math principles). The principal confirmed to OCR that during the disciplinary meeting with the Student he provided the Student with the Notice described above. He acknowledged that he did not provide the Notice in xxxxxxx xxxxx, but stated that he read the Notice to the Student and explained it to xxx, at which point xxx admitted xxxxxx the other student. He stated that, once he read the form to the Student, he placed it on the table and turned it around so the Student could see it. He stated that he told the Student that if xxx agreed that the form was accurate xxx needed to sign it. He stated that he believed that the Student could xxx the form because xxx pointed at the signature line and asked if xxx should sign there.

The District asserted to OCR that, as a result of multiple communications with the Student's parent, it had been determined that the Student did not generally need xxxxxxx xxxxx or xxxxxxx xxxxx for xxxxxxx. During the course of OCR's investigation, the District provided documentation showing that during the course of the 2014-2015 school year the Student completed schoolwork that was provided to xxx in the xxxx or xxxxxxx xxxxx xxxxx as the Notice, without issue. The District also provided copies of the Student's Section 504 plans for the 2013-2014, 2014-2015, and 2015-2016 school years. OCR's review of these documents confirmed that xxxxxxx xxxxx is only called for with respect to xxxxxxx xxxxxxxxxxx, and it is not a general service to be provided to the Student in all instances.

The documentation provided by the District also shows that the Student's Section 504 team has had a history of considering whether xxxxxxx xxxxx and/or xxxxx xxxxx is necessary for the Student and has consistently determined with the Student's parent that such was not necessary. For example, the District provided OCR with a copy of its xxxxxxx xxxxx Section 504 Written Notice (Written Notice) to the Student's parent regarding its decisions on the Student's Section 504 plan for the 2013-2014 school year. This Written Notice states that xxxxxxx xxxxx for the Student was not necessary for all work at that point. A Section 504 Written Notice to Parents, dated xxxxxxx x xxxx, states that, "The team discussed xxxxxxx xxxxxxx as a xxxxxxx accommodation. xxxxx said that xxx does not want xxxxxxx xxxxxxx at this time." A xxxxxxx xx xxxx, Written Notice to Parents states that "[The Student's xxxxxxx] does not want xxxxxxx xxxxx xxxxx at this point." A xxxxxxx xx xxxx, Section 504 Written Notice to Parents notes that the Student's parent reported to the District that she did not want xxxxx xxxxxxx xxxxxxxxxxx, such as xxxx. The District also provided a copy of the Student's xxxxxxx xxxxx Section 504 plan and accompanying Written Notice to OCR, which similarly shows that the Student's Section 504 team discussed whether the Student needed xxxxxxx xxxxx for xxxxx and determined, with agreement from the Student's parent, that such an accommodation was not necessary.

OCR interviewed the Student and gave xxx the opportunity to respond to information provided by the District. The Student told OCR that xxx understanding of the Section

504 plan is that xxx gets xxxxxxxxxxx xxxxxx whenever xxx needs it, and that xxx is to tell xxx teachers when such a need arises. The Student stated that xxx does not usually receive xxxxxxxxxxx xxxxxx for xxxxx, but that xxx needs xxxxxxxxxxx xxxxxx for xxxxx when the xxxxx is xxx xxx and/or when the xxxxx includes xxxxxxxxxxx.

[x--- paragraph redacted---x]

OCR also provided the Student's parent the opportunity to respond to information provided by the District.

[x---paragraph redacted---x]

In xxxxxxxx 2015, following the Student's 2015 Section 504 meeting, the parent confirmed to the District that the preferred method of communication with the Student, while the Student is in the office, such as for discipline, is xxxxxx communication. The District memorialized this information in a letter to the Student's parent, dated xxxxxxxx x, 2015. The Student's parent also expressed to OCR that, while the preferred method of communication with the Student is xxxxxx communication with respect to xxx interactions with the school's office staff, xxx wished to minimize all of the Student's interactions and communications with the school principal.

By letter dated August 27, 2015, the District provided OCR with a copy of its Administrative Guideline 9160A, which was titled "Accessibility of District Facilities" although it covered additional topics beyond facility accessibility, including communication with persons with disabilities. OCR's review of this procedure set forth in this document found that it specifically addresses the District's obligation to ensure that communications with individuals with disabilities are as effective as communications with others. This procedure appropriately notes the District's obligation to provide appropriate auxiliary aids and services to individuals where necessary to afford an individual with a disability an equal opportunity to participate in, enjoy the benefits of, a service, program, or activity conducted by the District. The procedure also appropriately states the factors to be considered in determining the appropriate auxiliary aid or service to be used: the length and complexity of the communication involved; the context in which the communication is taking place; the number of people involved; and the importance of the communication. The procedure also provides examples of auxiliary aids and services that may be provided, and notes that the District will give primary consideration to the choice expressed by the requestor. The District's effective communications procedure requires the District's building compliance officers and District compliance officer to handle auxiliary aids and services requests. These procedures do not, however, identify these individuals by name or provide contact information for them.

- **Analysis and Conclusion**

Here, the evidence shows that the Student's parent has consistently communicated to the District that the Student does not, as a general matter, require xxxxxxxxxxx xxxxxx or

xxxxxxxx xxx to xxxx xxxxxxxxxxx, and if the Student does need such an accommodation xxx is to ask for it, which xxx knows to do and has done in the past. As noted above, OCR's review of the discipline document at issue here found that the xxxx xxxx appeared to be the xxxx xx xxxxxx as other schoolwork that the Student has xxxx and completed without issue. Although the Student's parent and the Student reported to OCR that xxx could not xxxx the xxxxxxxxxxx document at issue in this case, the evidence also shows that the school principal xxxx, at a minimum, the relevant portions of the xxxxxxxxxxx document to the Student during the xxxxxxxxxxx meeting, as the Student was able to recount the information to OCR. The evidence also shows that the preferred method of communication for the Student when xxx is in the school office is xxxxxx communication. Therefore, based on the above, OCR concludes that the evidence is insufficient to find that the District failed to effectively communicate with the Student during the xxxxxxxx xx xxxx xxxxxxxxxxxxxxx meeting, in violation of Section 504 and Title II, as alleged.

Additionally, although the District is not required to maintain an effective communications procedure, OCR's review of the District's procedure identified some compliance concerns. For example, the current title of the procedure does not indicate that the procedure is applicable to effective communications for persons with disabilities. In addition, as noted above, the procedures fail to identify to who the District's compliance officers are for purposes of making an effective communications request. As explained below, the District has agreed to remedy the compliance concerns by signing the enclosed resolution agreement.

Alleged Failure to Address the Student's Parent's Disability Discrimination Complaint

- **Applicable Legal and Policy Standards**

The Section 504 implementing regulation at 35 C.F.R. § 104.7(b) states that a recipient that employs 15 or more persons shall adopt grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging any action prohibited by Section 504. The Title II regulation at 28 C.F.R. § 35.107(b) provides that a public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by Title II.

When evaluating whether a recipient's grievance procedures under Section 504 and Title II are prompt and equitable, OCR considers a number of factors, including whether the procedures provide for:

1. Notice of the procedures, including where complaints may be filed.
2. Application of the procedure to complaints alleging discrimination carried out by employees, other students, or third parties.

3. Adequate, reliable, and impartial investigation of complaints, including the opportunity to identify witnesses and other evidence.
4. Designated and reasonably prompt timeframes for the major stages of the complaint process.
5. Written notice to the parties of the outcome of the complaint.
6. An assurance that the school will take steps to prevent recurrence of any discrimination and to correct discriminatory effects on the complainant and others, if appropriate.

- **Summary of OCR’s Investigation**

The Student’s parent also alleged that on xxxxxxx xx xxxx, xxx wrote a letter to the District in which she complained about the principal requiring the Student to sign the Notice, which the Student could not xxx, without a parent present, and asked to speak at the next xxxxx xxxxxxx. xxx stated that xxx and the Student spoke at an Xxxxxxx xx xxxx, xxxxxx xxxxxxxx about what happened with the principal. She stated that after the xxxxx xxxxxxx xxx was contacted by the District’s executive director of pupil services (the director). xxx stated that the director told xxx that the District was going to revise the Notice form and would no longer require students to sign it. The Student’s parent stated that xxx asked the director to change the District’s policies to require that a parent be present at any xxxxxxxxxxx hearing for a Section 504 student. xxx stated that the director denied this request. The Student’s parent also stated that xxx received nothing in writing in response to xxx complaint to the xxxxx xx xxxxxxxxx.

The District provided OCR with a copy of the parent’s xxxxxxx xx xxxx, letter, which was sent to the superintendent and the administrator responsible for disciplinary appeals. OCR’s review of that letter found that it mentions that the discipline form provided to the Student was in a xxxxx xxxxx what the Student’s xxx xxxxxx considered acceptable for xxx and that the principal ignored the fact that xxx is xxxxxxx xxxxx. The District also provided OCR with copies of the statements the Student’s parent and the Student xxxxx to the xxxxx of xxxxxxxxxx during the xxxxxxx xx xxxx, xxxxx xxxxxxx. In the parent’s statement, xxx stated that the Student has a Section 504 plan because xxx is xxxxxxx xxxxx. xxx stated that the xxxxx on the xxxxxxxxxx form is xxx xxxxx. xxx referenced contacting OCR and expressed her concern that the Student’s rights were violated. She requested a new policy regarding xxxxxxxxxxxxxx children with Section 504 plans. The Student’s statement indicates that xxx could not xxxxx the form and that the principal did not xxxxx or xxxxxxx it to xxx.

OCR interviewed the director, who was also identified as responsible for the District’s Section 504 compliance. The director stated that the Student’s parent’s Xxxxxxx xx xxxx, letter to the District was sent to her for a response. The director told OCR that she did not believe the Student’s parent had made an allegation of disability discrimination in the xxxxxxx xx letter, as there was only brief mention of the Student’s

Section 504 plan, disability, and xxxx in one paragraph of the letter, and most of the discussion was about the District requiring students to sign the xxxxxxxxxxx form without a parent present. The director stated that she looked into the parent's concerns by speaking with the parent and the principal. She also told OCR that she reviewed the Student's Section 504 plan and found that there was not requirement for xxxxxxxxxxx xxxx in this context for the Student in the Section 504 plan. She told OCR that she did not consider her investigation to be a Section 504 disability discrimination investigation, but said she took the same steps she would have taken if she had believed it was a complaint of disability discrimination. She acknowledged, however, that she did not ask the Student's parent to identify witnesses nor did she provide written notice of her findings to the parent.

The director explained to OCR that, after looking into the matter, she concluded that disability discrimination had not occurred. The director told OCR that she called the Student's parent on xxxxxxx xx xxxx, and informed xxx, in part, that if there was another xxxxxxxxxxx incident involving the Student, the District would inform the parent as soon as possible, unless there were an emergency. She stated that she also informed the Student's parent that parents do not have a right to be present for xxxxxxxxxxx hearings, but that the District would provide the parent with due process regarding any future xxxxxxxxxxx matters. She stated that she also informed the Student's parent that, if there were another xxxxxxxxxxx incident involving the Student, the District would take care to have two adults present with the Student (preferably the counselor, a teacher who knows the Student, or the nurse), xxxxxxx the xxxxxxxxxxx form, and also xxxx it to the Student. She said that she told the Student's parent that the form giving the Student a xxx-xxx xxxxxxxxxxx (held in abeyance) regarding the xxxxxxx xx xxxx, incident would be held in her office and would not follow the Student. During the investigation, the District confirmed to OCR that the Student's xxxxxxxxxxx xxxxxxx at issue here is not, at all, a part of the Student's xxxxxxxxxxx xxxxxxx and has no impact on any future xxxxxxxxxxx the Student may receive. The director told OCR that she also re-trained the administrators on how to hold a due process hearing for the Student. The director reported to OCR that the parent was very pleased with this resolution. The District provided e-mail correspondence from the Student's parent acknowledging that the conversation took place.

The District provided a copy of the director's xxxxxxx xx xxxxx, e-mail to the District's superintendent, in which she memorialized the information she provided to the Student's parent, described above. In addition, as noted by the Student's parent to OCR, the director also informed her during the xxxxxxx xx telephone call, that the District was reviewing the Notice form, to determine whether it needed to be revised for students in grades Kindergarten through fifth grade. The District provided OCR with a copy of an e-mail from the District to the Student's parent dated xxxxxxx xx xxxx, stating that it had revised the Notice of xxxxxxx xxxxxxx form to make it more "child-friendly" and to remove the student signature line.

During the course of OCR's investigation, the District presented multiple versions of its Section 504 grievance procedures; however, before the conclusion of its investigation,

the District notified OCR by letter, dated September 22, 2015, that it intended to use the complaint procedure set forth in its Board Policy 2260.01, entitled “Section 504/ADA Prohibition Against Discrimination Based on Disability,” (the grievance procedure) as its Section 504 grievance procedure. The District also told OCR by letter that it would discontinue its use of any other procedures previously identified as addressing complaints of disability discrimination.

OCR’s review of the District’s grievance procedure (Board Policy 2260.01) found that the grievance procedure: provides notice of the procedures, including where complaints may be filed; identifies the District’s compliance officers by name and title, and provides their contact information; identifies the District’s building compliance officers as the building principals; explains that the District’s compliance officers oversee the investigation of any complaints of disability discrimination; provides for the impartial investigation of complaints; provides complainants with the opportunity to present witnesses; provides timeframes within which complaints should be filed (i.e., 30 days), the timeframe for the completion of the steps of the investigation (i.e., 15 days for the investigation and 10 days for the appeal); provides for written notice of the outcome of the complaint investigation to the complainant; affords a student or parent complainant the opportunity to appeal; and provides an assurance that, if discrimination is found to have occurred, the District will take corrective action to stop, remedy, and prevent the recurrence of the discriminatory action. The grievance procedure also includes a prohibition on retaliation against any individual who makes a report, files a complaint, or participates in the District’s discrimination investigations.

OCR’s review of the grievance procedure has also found that it does not allow for both parties to identify witnesses and evidence, does not provide for written notice to all parties of the outcome of the complaint, and does not allow all parties to the complaint an opportunity to appeal. Additionally, OCR notes that the District’s grievance procedures do not indicate that they are applicable to employees or other individuals, as they appear to be limited to complaints filed by students and or parents, and does not appear to apply to complaints of discrimination carried out by employees, other students, or third parties.

- **Analysis and Conclusion**

The evidence shows that on or about xxxxxxx xx xxxx, the Student’s parent made a complaint to the District about the principal’s failure to provide the Student with a xxxxxxxxxxx form in a xxxx xxx could xxxx in light of xxx xxxxxx xxxxxxxxxxx. OCR finds that the parent’s xxxxxxx xx xxxx, letter was a complaint of disability discrimination. The evidence also demonstrates that, although the director, who is one of the District’s Section 504 compliance officers, did not treat the complaint as a disability discrimination complaint, she specifically investigated the Student’s parent’s concerns by talking to the parent and the principal, and reported to OCR that she followed the same steps she would have followed had she considered it to be a disability discrimination investigation. Based on the information obtained during the investigation, the director concluded that disability discrimination had not occurred with respect to the October 2014 discipline incident. Although the evidence shows that the District failed to provide

the Student's parent with the opportunity to provide witnesses or written notice of the outcome, OCR finds that the District otherwise took appropriate action in response to this complaint and communicated that information to the Student's parent, to which the Student's parent acknowledged receiving.

In addition, OCR finds that the District has not adopted grievance procedures that fully provide for the prompt and equitable resolution of complaints alleging any action prohibited by the Section 504 regulation or the Title II regulation, in violation of 34 C.F.R. § 104.7(b) and 28 C.F.R. § 35.107(b). As set forth above, OCR has identified specific compliance concerns with the District's grievance procedures.

Resolution and Conclusion

To resolve the compliance finding made with respect to the District's failure to treat the Student's parent complaint as a disability discrimination complaint and fully adopt grievance procedures that provide for the prompt and equitable resolution of complaints alleging any action prohibited by the Section 504 regulation or the Title II regulation, and the compliance concerns identified with respect to the District's effective communications procedure, the District submitted the enclosed resolution agreement (the Agreement) on September 28, 2015. Under the terms of the Agreement, the District will revise its Section 504 grievance procedures and effective communications procedures and, once approved, adopt, implement, and publicize the revised procedures, and train staff on the revised procedures. OCR will monitor the implementation of the agreement. If the District does not fully implement the agreement, OCR will reopen the investigation and take appropriate action.

This concludes OCR's investigation of the complaint and should not be interpreted to address the District'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.

Please be advised that the District may not harass, coerce, intimidate, or discriminate against any individual because he or she has filed a complaint or participated in the complaint resolution process. If this happens, the harmed individual may file another complaint alleging such treatment.

The Complainant may file a private suit in federal court, whether or not OCR finds a violation.

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

OCR appreciates your cooperation and that of the District during the investigation and resolution of this complaint. If you have any questions about this letter or OCR's resolution of this case, please contact xxxx x xxxx, Supervisory Attorney/Team Leader, at (xxx) xxx-xxxx or by e-mail at xxxx.x.xxxx@ed.gov.

For questions about implementation of the Agreement, please contact xxx xxxxxxx xxxxxx, who will be monitoring the District's implementation, by e-mail at xxxxxxx.xxxx@ed.gov or by telephone at (xxx) xxx-xxxx. We look forward to receiving the District's first monitoring report by **October 30, 2015**.

Sincerely,

/s/

Meena Morey Chandra
Director

Enclosure