

**RESOLUTION AGREEMENT**  
**Owasso Public School District**  
**Docket No. 05-24-1363**

Owasso Public School District (District) enters into this Voluntary Resolution Agreement (Agreement) with the U.S. Department of Education, Office for Civil Rights (OCR), to resolve the referenced complaint. The District assures OCR that it will take the following actions to comply with the requirements of Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. §§ 1681- 1688, and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination based on sex in any education program or activity receiving federal financial assistance. This Agreement does not constitute an admission that the District is not in compliance with Title IX and/or the 2020 Title IX regulation. As used herein, the term “School” shall refer only to Owasso High School, which encompasses grades 9-12.

**I. INDIVIDUAL REMEDIES**

- A. By **December 1, 2024**, the District will send a letter via certified mail to the parents of Student A, Student B, Student C, Student D, Student E, Student F, Student H, Student M, Student O, and Student P (collectively, the Students), offering them to meet individually with the District’s Title IX Coordinator to discuss how to file a formal Title IX complaint pursuant to the District’s *Discrimination, Harassment, and Retaliation Policy*. The letter will also inform the parents of the availability of supportive measures for those listed students currently enrolled in the District whether or not they choose to file a formal complaint of sexual harassment with the District.
- B. Should any or all of the parents of the Students accept the District’s offer to meet, the District shall meet with each accepting parent as soon as possible at a mutually agreeable time and place, but no later than 30 days of the parent’s acceptance. The District will document each meeting with the parents of the Students, if applicable, including the date of each meeting, a list of meeting participants, identification of the topics discussed, a description of supportive measures considered and whether they were accepted or rejected, and the District’s final determination regarding supportive measures. Supportive measures to be discussed shall include counseling support, class changes, academic support including compensatory education, and increased monitoring of certain areas of the School. Any supportive measures accepted will be provided by February 13, 2025.

**C. REPORTING REQUIREMENTS**

1. By **January 10, 2025**, the District will submit to OCR documentation demonstrating it has implemented Item I.A, including a copy of the letters to the parents of the Students, a copy of any responses to the letters, and the scheduled date of each meeting.
2. By **February 15, 2025**, the District will submit to OCR the documentation outlined in Item I.B demonstrating, as applicable, the topics discussed at any meetings with the parents of the Students, a description of the supportive measures considered and whether they were accepted or rejected, and the District’s final determination regarding supportive measures.

3. If applicable, by **March 28, 2025**, the District will submit to OCR documentation demonstrating the supportive measures provided as outlined in Item I.B.

## **II. PUBLIC ANTI-HARASSMENT STATEMENT**

- A. No later than **February 15, 2025**, the District will issue a statement to the District community, including District students, parents, and employees, which will be widely published, including in the District's newsletter or e-mail communication and on the District's website, stating that District policy prohibits sex discrimination, including sexual harassment, in District programs and activities. The statement will:
  1. Encourage any student, parent, or employee who believes he or she has been subjected to sexual harassment to report the incident(s) to the District's Title IX Coordinator;
  2. Explain that prohibited sexual harassment includes conduct on the basis of sex that could meet one or more of the Title IX regulatory definitions, at 34 C.F.R. § 106.30(a), as applied to any student;
  3. Note the District's commitment to conducting a prompt and equitable Title IX investigation and immediately and appropriately addressing any violation of the District's policies;
  4. Inform District community members of how to report allegations of sexual harassment at the school building level and how to file a formal Title IX complaint pursuant to the District's grievance procedures with the Title IX Coordinator;
  5. Explain the role of the Title IX Coordinator and provide specific contact information for the Title IX Coordinator;
  6. Discuss the availability of supportive measures and protections against retaliation and harassment available to individuals reporting such incidents regardless of whether they file a formal complaint;
  7. Inform all members of the District community of the District's responsibility to take appropriate steps to end sexual harassment across the District, eliminate the hostile environment and its effects, and prevent its recurrence;
  8. Highlight resources available to individuals who have been subjected to sexual harassment; and
  9. Explain that the District will complete investigations in an appropriate manner.

## **B. REPORTING REQUIREMENTS**

1. By **November 15, 2024**, the District will provide to OCR a copy of the proposed statement for review and approval. Within 30 calendar days of receipt of OCR's approval, the District will submit to OCR documentation demonstrating that the anti-harassment statement has been widely published; including copies of the

District's newsletter or e-mail communication and relevant pages of its website where the statement appeared.

### **III. NOTICE OF NONDISCRIMINATION**

- A. By **December 1, 2024**, the District will review and revise its Notice of Nondiscrimination to ensure it is compliant with the Title IX implementing regulation.
- B. Within **30** days of OCR's approval, the District will prominently display the approved Notice of Nondiscrimination on its website and in each handbook or catalog that it makes available to persons entitled to notification under the Title IX implementing regulations.

### **C. REPORTING REQUIREMENTS**

- 1. By **December 1, 2024**, the District will submit to OCR for review and approval its revised Notice of Nondiscrimination.
- 2. Within **30** days of OCR's approval, the District will submit to OCR documentation that that it has complied with Item III, including providing a web link to the District's website and copies of any handbook or catalog with the revised Notice of Nondiscrimination.

### **IV. TITLE IX GRIEVANCE PROCEDURES**

- A. By **January 15, 2025**, the District will review and revise its Grievance Procedure to ensure compliance with the requirements under Title IX and its implementing regulations, at 34 C.F.R. § 106.45, for grievance procedures for the prompt and equitable resolution of complaints of sex discrimination (Title IX Grievance Procedures).

### **B. REPORTING REQUIREMENTS**

- 1. By **January 15, 2025**, the District will submit to OCR for review and approval a draft of its revised Title IX Grievance Procedures and any related documents. OCR will review the grievance procedures and related materials in order to ensure compliance with Title IX and this Agreement.
- 2. Within **45** calendar days of OCR's approval, the District will submit to OCR documentation that the District has formally adopted the revised Title IX Grievance Procedure and related documents; updated all printed publications and on-line publications with the revised documents; and electronically disseminated the revised grievance procedures to students and employees. This documentation will include evidence of the electronic dissemination of the revised grievance procedures to students and employees, a list of the titles of the publications in

which the information appears as well as a copy of any such publications or a link to an on-line publication containing the revised grievance procedures.

## V. NOTICE OF TITLE IX COORDINATOR

- A. By **December 1, 2024**, the District will revise the District's Student Handbooks, policy 1.22 and 1.45, and website to provide the correct name or title, office address, electronic mail address, and telephone number of the employee designated as the District's Title IX Coordinator.

## B. REPORTING REQUIREMENTS

1. By **December 15, 2024**, the District will submit to OCR a copy of the revised Student Handbooks and a web link to the District's website containing the notice of the Title IX Coordinator.

## VI. TITLE IX STAFF TRAINING

- A. The District will provide annual training on the District's obligation to comply with Title IX to any person who facilitates or is involved in an informal resolution process for reports of sexual harassment, including but not limited to the Title IX Coordinator, investigators, School administrators, School teaching and counseling staff, and any classroom School employee who has interactions with students such that they may receive a report of sexual harassment. The training will be conducted by (an) individual(s) knowledgeable about the laws and issues pertaining to Title IX and may be delivered in multiple sessions and/or an electronic format. The training will include the following components, at a minimum:

1. The District's prohibition against discrimination based on sex, including sexual harassment;
2. A general overview of the District's policies prohibiting sexual harassment and its Title IX Grievance Procedures, including what constitutes sexual harassment; the duty to report sexual harassment; how to report sexual harassment and file a formal complaint of sexual harassment; the name and contact information of the District's Title IX Coordinator; where to locate the District's policies prohibiting sexual harassment and its Title IX Grievance Procedures on the District's website; and the existence of OCR and its authority to enforce Title IX;
3. The steps District employees must take if they receive a report of sexual harassment including to whom to report it to; who is responsible for offering the affected student(s) supportive measures while the investigation is pending; the different types of supportive measures; and who is responsible for notifying the affected student(s) of how to file a formal complaint;
4. The District's procedures and scope of responsibility when there is a pending criminal complaint/investigation; and
5. The District's Title IX record-keeping requirements.

B. The District will provide annual training on how to respond to a report and/or formal complaint of sexual harassment to any person who facilitates the formal resolution process, including but not limited to the Title IX Coordinator, investigators, and final decision-makers. The training will be conducted by (an) individual(s) knowledgeable about the laws and issues pertaining to Title IX and may be delivered in multiple sessions and/or an electronic format. The training will include the following components, at a minimum:

1. The definition of sexual harassment with examples;
2. The scope of the recipient's education program or activity;
3. Implementation of the District's Title IX grievance procedures that comply with the requirements under Title IX and its implementing regulations, at 34 C.F.R. § 106.45, including dismissing a complaint, and how to conduct a prompt and equitable Title IX grievance process including an investigation, hearings and appeals, as applicable, and informal resolution processes in lieu of formal grievance process; and
4. Identifying issues of relevance to create an investigative report that fairly documents and summarizes relevant evidence.

#### **C. REPORTING REQUIREMENTS**

1. By **June 1, 2025**, the District will submit to OCR documentation that it has provided the employee trainings for the 2024-2025 school year, including the date(s) of the trainings, the name(s) and title(s) of the trainer(s), a copy of any materials used or distributed during the trainings, a sign-in sheet or other evidence of attendance with the names and titles of the individuals who attended the trainings, a list of the required District employees who did not attend, and a plan for providing follow-up training for those employees who did not attend, as needed. The documentation should reflect that the District addressed the topics specifically identified in this Item.
2. By **June 1, 2026**, the District will submit to OCR documentation that it has provided the employee trainings for the 2025-2026 school year, including the date(s) of the trainings, the name(s) and title(s) of the trainer(s), a copy of any materials used or distributed during the trainings, a sign-in sheet or other evidence of attendance with the names and titles of the individuals who attended the trainings, a list of the required District employees who did not attend, and a plan for providing follow-up training for those employees who did not attend, as needed. The documentation should reflect that the District addressed the topics specifically identified in this Item.

#### **VII. STUDENT TRAINING**

A. The District will provide annual age-appropriate student training at the School on the

District's policies prohibiting sexual harassment and its Title IX Grievance Procedures. The student education will include the following components, at a minimum:

1. Defining what constitutes sexual harassment, with examples;
2. The District's prohibition against such harassment and its obligations when a report or formal complaint of sexual harassment is made;
3. The importance of reporting sexual harassment;
4. How and to whom to report sexual harassment and how to file a formal complaint of sexual harassment;
5. The availability of supportive measures when a student reports sexual harassment;
6. The prohibition against retaliation for reporting incidents; and
7. The consequences for subjecting individuals to sexual harassment or retaliation.

#### **B. REPORTING REQUIREMENTS**

1. By **May 1, 2025**, the District will submit to OCR documentation that it has provided the student training for the 2024-2025 school year, including the date(s) of the training(s), the name(s) and title(s) of the trainer(s), and a copy of any materials used or distributed during the training(s). The documentation should reflect that the District addressed the topics specifically identified in this Item.

#### **VIII. TRAINING ASSESSMENT**

- A. By **May 15, 2025**, the District will assess the effectiveness of the training referenced in Items VI and VII for the 2024-2025 school year by conducting a survey of the individuals who attended the trainings. The survey will specifically inquire about the knowledge the attendees acquired regarding the topics covered by the trainings.

#### **B. REPORTING REQUIREMENTS**

1. By **April 1, 2025**, the District will provide OCR the survey it proposes to use to assess the effectiveness of the trainings referenced in Items VI and VII.
2. Within 30 days of OCR's approval of the training assessment survey, the District will administer the training assessment survey to the individuals who attended the trainings.
3. Within 60 days of administering the survey, the District will provide documentation to OCR of the results of the survey and a description of any actions the District proposes to take in response should the results show that the individuals who attended the trainings are not knowledgeable about the topics covered in their respective training.
4. By **December 1, 2025**, the District will submit to OCR documentation that it has taken the further action(s) in response to survey results, if necessary.

## **IX. CLIMATE SURVEY**

A. By **April 1, 2025**, the District will develop and conduct a climate survey to be distributed to its students and staff at the School as relates to sexual harassment. The District will use the information gathered in these surveys to inform its actions with respect to its Title IX compliance, including whether any interventions are needed to further improve the school climate. The survey will allow for students and staff to answer the survey anonymously and include questions designed to gather information regarding:

1. Level of perceived safety while accessing District programs and activities;
2. Knowledge about what constitutes sexual harassment;
3. Knowledge of the process by which students can make reports of sexual harassment;
4. The prevalence of sexual harassment at the School;
5. The willingness to report incidents of sexual harassment to District personnel;
6. The perception of the District's responding to reports and complaints of sexual harassment; and
7. Suggestions for reducing incidents of sexual harassment in the School and improving the District's response to reports and complaints of sexual harassment, including disciplinary and supportive measures.

## **B. REPORTING REQUIREMENTS**

1. By **January 15, 2025**, the District will submit to OCR for its review and approval the proposed climate survey and a description of how the District plans to administer the climate survey at the School to maximize the response rate.
2. Within **30** days of OCR's approval of the climate survey, the District will administer the climate survey at the School.
3. Within **60** days after the District administers the climate survey at the School, the District will submit to OCR (a) a report summarizing the results of the survey; and (b) for OCR's review and approval, a description of further action(s), if any, the District proposes to take in response to the survey results.
4. By **May 31, 2025**, the District will submit to OCR documentation that it has taken the further action(s) in response to survey results.

## **X. COMPLAINT REVIEW**

A. By **January 15, 2025**, the District will review all complaints and reports of alleged conduct that could constitute sexual harassment made from the 2021-2022 through 2023-2024 school years, including any individual files OCR has identified in attached Appendix A, to determine whether the District investigated or otherwise responded to

each complaint or report consistent with Title IX requirements, including but not limited to assessing whether:

1. the incident was identified as possible sexual harassment;
2. the District notified the complainant how to file a formal complaint of sexual harassment;
3. the investigation and any appeals were handled promptly;
4. appropriate Title IX definitions and legal standards were applied, including but not limited to the preponderance of the evidence standard;
5. appropriate supportive safety measures were provided to protect the complainant from additional harassment or retaliation during the pendency of the investigation and to provide other support as needed, e.g., counseling and academic adjustments;
6. both parties were given the right to provide evidence and identify witnesses;
7. both parties were given written notice of the outcome (including any appeals);
8. equal appeal rights were given to the complainant and the respondent; and
9. appropriate steps were taken to prevent the recurrence of sexual harassment, against the complainant and other members of the District community, and to address any hostile environment created by sexual harassment, including in cases where the complainant refused to cooperate but the District had sufficient information to investigate possible sexual harassment and prevent its reoccurrence.

The District will take appropriate action to address any deficiencies it identified regarding how these complaints or reports were handled, including providing appropriate remedies that may still be available for the complainants in these cases, such as counseling or reimbursement for documented counseling resulting from the District's actions; academic assistance or adjustments; or other appropriate relief. The District will also take steps to determine if any sexual harassment may be ongoing as a result of the District's failure to properly address any of these complaints and will take appropriate measures to address the sexual harassment appropriately.

## **B. REPORTING REQUIREMENTS**

1. By **May 1, 2025**, the District will submit to OCR for review and approval the results of its review conducted pursuant to Item X, specifically identifying any sexual harassment complaints or reports that were not handled timely and equitably; all supporting materials relating to the District's review; and the District's planned action(s) to address any problems identified in the review. Within 45 days of OCR's approval, the District will provide OCR with documentation that it has taken appropriate action to address any problems identified in its review.



## **XI. RECORDKEEPING**

- A. By **December 15, 2024**, the District will develop and implement a recordkeeping system that adequately and accurately documents and preserves all records required by the Title IX implementing regulation, at 34 C.F.R. § 106.45(b)(10), including, but not limited to, all reports and formal complaints of sexual harassment, including reports alleging conduct that could constitute sexual harassment, the District's responses to such reports and investigations of such complaints, any written documentation sent or received in relation to the report or complaint, notification letters, interview notes, witness statements, and any relevant correspondence.

The District's Title IX Coordinator will review all reports of sexual harassment at the School within 30 days of receipt to ensure that they are being processed in a prompt and equitable manner. Within 30 days of the final outcome of the complaint, the Title IX Coordinator will identify any inequities or delays in the complaint resolution process. If the District's Title IX Coordinator identifies any concerns regarding the District's response to the report, the District's Title IX Coordinator will document the concerns, direct the responsible individuals to address those concerns, and follow up to ensure that all concerns are addressed.

## **B. REPORTING REQUIREMENTS**

1. By **December 1, 2024**, the District will submit to OCR for review and approval a detailed description of its proposed recordkeeping system.
2. Within **30** days of OCR's approval, the District will submit to OCR documentation demonstrating that it has implemented the recordkeeping system.
3. Within **30** days of the end of each semester until OCR closes the monitoring, the District will provide to OCR copies of the records retained pursuant to this Item and documentation that the Title IX Coordinator has (a) reviewed all reports and formal complaints of sexual harassment at the School; (b) confirmed that they were processed pursuant to the District's policies; (c) identified all concerns about the District's response; and (d) followed up to ensure that such concerns were addressed and resolved. The District will provide a summary of any identified concerns and the corrective action taken to resolve them.

## **XII. AUDIT, SCHOOL YEARS 2024-2025 AND 2025-2026**

- A. The District will conduct an annual audit at the end of SY 2024-2025 and SY 2025-2026, to review the consistency of application and compliance with the District's policies and Title IX Grievance Procedures addressing sexual harassment. The District will complete the audit no later than June 30 annually. The audit will include, at a minimum:
1. Identification of the school year for which the audit is being conducted;

2. A review of all reports or complaints (verbal or written) received during the school year potentially raising sexual harassment;
3. An assessment of whether each report or complaint was processed in accordance with the District's policies and procedures; and,
4. A self-evaluation by the District with regard to any areas of concern arising based on the review and analysis outlined above, including recommendations for the subsequent school year.

Upon completion of the annual audit, the District will generate a report summarizing the audit's findings, addressing areas of concern, and identifying recommendations for improvement, if any. The report will be distributed through written correspondence and/or email to appropriate staff, including the Superintendent, Title IX Coordinator, principals, and each site-based staff member responsible for addressing complaints of sexual harassment, as well as any other staff whom the District deems appropriate.

#### **B. REPORTING REQUIREMENTS**

1. No later than **August 1** after each of the following school years, SY 2024-2025 and SY 2025-2026, the District will submit documentation to OCR demonstrating the District's compliance with the provisions outlined in this Item, including demonstration that the audit was conducted, and the report was distributed to the identified staff. The District will promptly and fully address OCR's feedback, if any, until the District receives notice from OCR that no further reporting is required for this Reporting Requirement.

#### **GENERAL TERMS AND PRINCIPLES**

By signing and entering into this Agreement, the District does not admit that it knew of acts of harassment in its programs and activities that were so severe, pervasive and objectively offensive that it deprived any student of access to the educational benefits of opportunities provided by the District. The District 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 this Agreement. Further, the District understands that, during the monitoring of this Agreement, OCR may visit the District, 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 and obligations of this Agreement. 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 and its implementing regulations, 34 C.F.R. Part 106, which were at issue in this complaint.

The District understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings 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 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.

Owasso Public School District  
OCR Docket #05-24-1363  
Page 11 of 11

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

Margaret Coates

For the District  
Dr. Margaret Coates, Superintendent

11-12-2024

Date