

Little Lake City School District
Resolution Agreement
OCR Case Number 09-24-1234

The Little Lake City School District (District), without admitting to any violation of law, agrees to implement this Resolution Agreement (Agreement) to resolve the compliance concerns identified by the U.S. Department of Education (Department), Office for Civil Rights (OCR) under Section 504 of the Rehabilitation Act of 1973 (Section 504) and its implementing regulations at 34 C.F.R. Part 104, and Title II of the Americans with Disabilities Act of 1990 (Title II) and its implementing regulations at 28 C.F.R. Part 35, in the above-referenced OCR case number.

I. Readmission of Student and Section 504 Meeting

A. By August 17, 2026, contingent upon the Student's resident school district's release, the District will readmit the Student as an inter-district transfer student on the same basis as he previously was granted an inter-district transfer permit prior to September 22, 2023.

B. Within 15 school days of his readmission, after providing proper written notice to the Student's parent/guardian (the Complainant), the District will convene a meeting of a Section 504 team, consisting of a group of knowledgeable persons, including the Complainant, to review the Student's current Section 504 plan.

1. The Section 504 team will review and consider the Student's current present levels of performance, any relevant assessment or evaluation data, and any changes or advancements in the Student's education that have occurred since the time of revocation (September 2023), in reviewing, amending, and/or updating the Student's Section 504 plan.

2. The Section 504 team will also consider whether the Student needs any compensatory and/or remedial services as a result of any possible denial of a free appropriate public education (FAPE) arising from a failure to timely evaluate the Student for eligibility under Section 504 as a student with a disability.

Should the Section 504 team determine that compensatory aids and/or services are appropriate to address any loss of FAPE resulting from the District's actions, the District will develop a plan for provision with a completion date not to extend beyond January 15, 2027.

3. The District will provide the Student's parent/guardian notice of the procedural safeguards including the right to challenge the group's determination through an impartial due process hearing. Any disputes, concerns, or issues that

cannot be resolved between the District and the Complainant about the Student's readmission or placement shall be resolved by the Student's Section 504 team, and the Complainant shall be afforded all procedural safeguards related to any placement determination.

4. Should the District propose to revoke the Student's inter-district transfer upon the Student's failure to comply with the terms of the inter-district transfer permit, the Student's Section 504 team shall conduct an appropriate evaluation of the Student. Any decision regarding the Student's placement, including revocation of the inter-district transfer permit, shall be made by the Student's Section 504 team, which shall include the Complainant. The Section 504 team shall consider all information provided, and shall determine whether the Student's failure to comply with the terms of the inter-district transfer permit is a result of the Student's disabling condition, as well as whether the Student's then-current Section 504 plan was appropriate to address the Student's disability-related needs, and was implemented with fidelity at the time of any failure to comply with the terms of the inter-district permit.

Reporting Requirement

C. Withing ten (10) days of readmitting the Student pursuant to Section I.A of this Agreement, the District will provide OCR with verification that the Student has been readmitted as required and will provide OCR with details of his placement upon readmission.

D. Within two weeks of the Section 504 meeting outlined in Section 1.B of this Agreement, the District will submit to OCR documents supporting the group's decision. The documentation submitted shall include documentation showing the participants in the meeting, the information considered, an explanation for decisions made regarding placement and/or services, and a description of and schedule for providing compensatory and/or remedial services (if any) to the Student. OCR will, prior to approving the District's decision and plan for providing the proposed services, review the documentation to ensure that the District met the requirements of the regulation implementing Section 504, at 34 C.F.R. §§ 104.34, 104.35 and 104.36, and, as applicable, Title II, at 28 C.F.R. § 35.160, in making these determinations.

E. By January 30, 2027, the District will provide documentation to OCR of the dates, times and locations that compensatory and/or remedial services were provided, a description of what was provided, and the name(s) of the service provider(s).

II. Training

A. By September 30, 2026, the District will provide training on the requirements of

Section 504 and Title II,3) information, as relates to: (1) identification and evaluation of students suspected of having disabilities; (2) how disability is defined under Section 504 and Title II; (3) information about what constitutes a significant change in placement for students with disabilities; and (4) the procedures required by law prior to determining to make a significant change in placement. The training will be provided to all administrators, staff (including school psychologists and service providers), and teachers at the School the Student attended prior to revocation of his inter-district transfer permit and at the School the Student enrolls in upon readmission, who are responsible for ensuring that students with or suspected of having disabilities are timely evaluated and, if identified as students with disabilities, provided a FAPE. The training will also include a period that allows for questions and answers.

B. By September 10, 2026, the District will provide to OCR for its review and approval, the education, knowledge, and experience of the individual(s) selected to give the training and a copy of the proposed training materials.

Reporting Requirement

C. Within twenty (20) days of completing the training required by Section II.A of this Agreement, the District will provide to OCR written verification that the training has taken place. The verification will state the date(s) on which the training occurred, the names and titles of the attendees, a copy of the sign-in sheets for the training, and a copy of any documents provided to the attendees.

In the event that any individuals required to attend this training are unable to attend, the District may consult with OCR about alternative methods of providing make-up training to those who did not attend the training on the date(s) it was given.

III. Guidance Memorandum

A. By September 15, 2026, the District will create for OCR review and approval a memorandum that provides guidance and information about the Section 504 requirements outlined in the training pursuant to Section II.A of this Agreement. The memorandum will be distributed to all District administrators for review and announcement to their respective staffs.

B. Within fifteen (15) days of OCR's approval of the memorandum required in Section III.A of this Agreement, the District will disseminate the memorandum in accordance with the requirements of Section III.A of this Agreement. Dissemination may be done through electronic mail, placement in internal mailboxes, or any other method that is designed to reach the maximum number of recipients possible.

Reporting Requirement

C. Within fifteen (15) days of dissemination of the memorandum required by Section

III.A of this Agreement, the District will provide verification to OCR that it has completed the requirements by informing OCR of the total number of copies distributed, the date(s) of distribution, the method(s) of distribution, and a list of those to whom it sent the memorandum. The District will also provide OCR a copy of the email or mailing that was sent to those to whom the distribution was made.

IV. Monitoring

By signing this agreement, the District agrees to provide data and other information in a timely manner in accordance with the reporting requirements of the resolution agreement. During the monitoring of the resolution 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 of the resolution agreement. The District understands that OCR will not close the monitoring of the agreement until such time as OCR determines that the District is in compliance with the terms of the agreement and the statute(s) and regulation(s) at issue in the case.

The District understands that OCR may initiate administrative enforcement proceedings or refer the case to the Department of Justice (DOJ) for judicial proceedings to enforce the specific terms of the resolution agreement and the applicable statute(s) and regulation(s). Before initiating such proceedings, OCR will give the District written notice of the alleged breach and 60 calendar days to cure the alleged breach.

for Little Lake City School District

/s/

Monica Johnson, Superintendent

6/19/2026

Date