VOLUNTARY RESOLUTION AGREEMENT
Advantage Charter Academy
OCR Case Number: 06-21-1277

Advantage Charter Academy (Academy) and its charter management organization, National Heritage Academies (NHA), submit this Voluntary Resolution Agreement (Agreement) to the U.S. Department of Education (Department), Office for Civil Rights (OCR). NHA and the Academy assure OCR that they will take the following actions to comply with the requirements of 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, and 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 based on disability by recipients of Federal financial assistance from the Department and certain public entities, respectively.

Prior to the completion of OCR's investigation, NHA and the Academy agreed to resolve certain concerns identified during OCR's investigation in the above-captioned complaint pursuant to Section 302 of OCR's Case Processing Manual. Accordingly, to resolve the identified issues, the Academy agrees to take the actions below to ensure compliance with Section 504 and Title II.

By entering into this Agreement, neither NHA nor the Academy admits any violation of Section 504, Title II, or their implementing regulations, or any other law, and this Agreement shall not be construed as such an admission.

SECTION A: REVIEW AND REVISION OF PROCEDURES FOR INVESTIGATING DISABILITY HARASSMENT COMPLAINTS

Action Item A

1. **By <u>October 31, 2026.</u>** NHA and/or the Academy will review and revise as needed its policies, procedures, and common practices for investigating and resolving disability harassment complaints. If determined appropriate by NHA and/or the Academy, the Academy will make modifications to its current policies and practices (e.g., ensuring that the Academy promptly investigates any disability harassment complaints it receives, ensuring disability harassment complaints are referred to either a specific contact person with a set backup person should the first contact person go out on leave, leave the Academy, etc., or referred to a specific mailbox with limited access for the applicable staff investigating the complaints, etc.).

Reporting Requirement:

a. **By <u>November 15, 2026.</u>** NHA and/or the Academy will provide documentation to OCR evidencing NHA's and/or the Academy's completion of Action Item A. If determined to be appropriate, the documentation will include a copy of the Academy's revised policies and procedures concerning disability harassment

complaints. Regardless of whether the Academy revises its policies and procedures concerning disability harassment complaints, NHA and/or the Academy will provide all applicable policies, procedures, practices, etc., to OCR for OCR's review.

SECTION B: STAFF TRAINING

Action Item Bl

1. **By January 29, 2027,** NHA and/or the Academy agrees to conduct training for all administrators, teachers, and staff at the Academy regarding provisions in Section 504 and Title II concerning the Academy's obligation to ensure that students with disabilities receive a free appropriate public education (FAPE); different treatment of students with disabilities; changes in placement for students with disabilities; Section 504 and Title II's prohibitions against disability-based harassment; the responsibility of staff and administrators to report incidents of possible harassment; the Academy's OCR-reviewed policies and procedures for responding to complaints of disability harassment; and instruction on how to recognize, prevent, and respond appropriately to such harassment. The training will be conducted by an individual with relevant knowledge of the regulations implementing Section 504 and Title II and experience advising educational institutions of their obligations pursuant to Section 504 and Title II.

Action Item B2

2. **By January 29, 2027,** the NHA and/or the Academy agrees to conduct training for all staff members at the Academy who are directly involved in processing, investigating and/or resolving complaints or other reports of disability-based harassment, and any counselors or other Academy personnel who are likely to receive confidential rep01ts of disability-based harassment. The training will be conducted by an individual with relevant knowledge of the regulations implementing Section 504 and Title II and experience advising educational institutions of their obligations pursuant to Section 504 and Title II. The training will include instruction regarding:

    a. The conduct that constitutes disability-based harassment, including examples of disability-based harassment, and a discussion about the negative impact that such harassment has on the educational environment;
    b. NHA and the Academy's responsibility under Section 504 and Title II to address disability-based incidents of harassment about which it knows or reasonably should have known;
    c. Identification of designated staff at the Academy who is/are available to answer questions or concerns regarding the Academy's policies, as reviewed by OCR, and regulations or other issues related to disability-based harassment;
    d. NHA and the Academy's responsibility to take prompt and appropriate action to investigate incidents of disability harassment;

e. How to conduct disability harassment investigations in an adequate, reliable, and impat1ial manner, including the appropriate standards to apply in such investigations, and an outline of the appropriate disciplinary measures for violations of the Academy's anti-harassment policy in accordance with the Academy's Student Code of Conduct;
f. If an investigation reveals that discriminatory harassment has occurred, the NHA and the Academy's responsibility to take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring; and
g. The duty of NHA and the Academy to respond to incidents of disability harassment as stated in (b)-(e) above even if the misconduct also is covered by an anti-bullying policy, and regardless of whether a student complained, asked the NHA and/or the Academy to take action, or identified the harassment as a form of discrimination.

Reporting Requirements:

a. **By November 30, 2026,** the NRA and/or the Academy will provide OCR with the identity and qualifications of the individual who will be conducting the trainings required pursuant to Action Items Bl and B2.
b. **By February 28, 2027,** the NHA and/or the Academy will provide OCR with documentation that it conducted the trainings pursuant to Action Items B1 and B2. The documentation will include the date(s) and time(s) NRA and/or the Academy conducted the training, a copy of the presentation materials used, and a copy of the sign-in sheets with the names and titles of each training attendee.

SECTION C: GENERAL PROVISIONS

By signing the resolution agreement, NHA and the Academy agree 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, if necessary, OCR may visit the Academy, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the recipient has fulfilled the te1ms of the resolution agreement.

NHA and the Academy understand that OCR will not close the monitoring of the agreement until such time as OCR determines that the NHA and the Academy are in compliance with the terms of the agreement and the statute(s) and regulation(s) at issue in the case.

The NHA and the Academy understand that OCR may initiate administrative enforcement proceedings or refer the case to the Department of Justice (DOJ) for judicial proceedings in the event of breach. Before initiating such proceedings, OCR will give the NHA and the Academy written notice of the alleged breach and 60 calendar days to cure the alleged breach.

SECTION D: EXECUTION

This Agreement will become effective immediately upon the signature of the NHA and Academy Representatives below.

/s/ 8/18/2026

Mendrek Solite, Jr., Principal
Advantage Charter Academy - Baker

/s/ 8/19/2026

Shane Pranger, Director of Legal & Compliance
National Heritage Academies