

**Resolution Agreement  
between  
The United States of America  
and  
Newcastle Public Schools**

Newcastle Public Schools (the District) and the United States Department of Justice, Civil Rights Division, Educational Opportunities Section (the Department) voluntarily enter into the following Agreement to improve the District's ability to prevent and appropriately respond to peer-on-peer harassment and to resolve the Department's investigation into complaints of harassment on the basis of race, national origin, religion, and sex, including sexual orientation and sex stereotypes, in the District. The Department conducted its investigation under Title IV of the Civil Rights Act of 1964, 42 U.S.C. § 2000c *et seq.*, which authorizes the Department to address certain complaints of discrimination in public schools.

The District cooperated fully and expressed a willingness to take immediate steps to improve its ability to prevent and appropriately respond to peer-on-peer harassment. The District agrees to take the following actions and will ensure that District employees comply with the commitments described below:

**I. Revised Prohibition on Harassment, Intimidation, and Bullying**

- A. The District will review all District and school-level policies, handbooks, and practices related to harassment, intimidation, and bullying on the basis of protected classes and revise them as needed to ensure consistency with schools' obligations under federal law to respond to complaints promptly and effectively.
- B. The District will revise Board of Education Policy FNCD (Policy FNCD) to expressly state that students are prohibited from harassing, intimidating, or bullying other students on the basis of protected characteristics, including race, national origin, religion, and all forms of sex discrimination. Revised Policy FNCD will also:
  - 1. State that students can report complaints either verbally or in writing to any school personnel, or by using the STOPit app/website;
  - 2. State that District and school-level employees must report all incidents of harassment, intimidation, or bullying on the basis of a protected class that are directly disclosed to them, that they overhear or observe, or that they otherwise learn about indirectly;
  - 3. Identify the District's Compliance Officers by name and title and include their contact information; and
  - 4. Be published in all student handbooks and on the District's website.
- C. The District will revise the Newcastle Middle School and Newcastle High School Student Handbooks to explicitly state that, consistent with revised Policy FNCD, students are prohibited from harassing, intimidating, or bullying other students on

the basis of race, national origin, religion, and all forms of sex discrimination. The revised student handbooks will also:

1. Include multiple examples of conduct that may constitute harassment, intimidation, or bullying on the basis of a protected class;
  2. Include resources and information about how to identify and report harassment, intimidation, and bullying;
  3. Be provided to all students and families annually and on request; and
  4. Be published on the District's website.
- D. The District will develop and/or modify existing policies and practices to ensure that students who exhibit signs of depression, anxiety, self-harm, or suicidality resulting from harassment, intimidation, or bullying are identified, evaluated, and provided appropriate support services and accommodations.

## **II. District Response to Harassment Complaints**

- A. District and school-level employees will, consistent with Policy FNCD, promptly report any incident or behavior that could constitute harassment, intimidation, or bullying on the basis of a protected class to their building principal, the superintendent, and/or the superintendent's designee for investigation.
- B. The District's Compliance Officers and/or their designee will comply with policy and procedural requirements to ensure that all complaints are properly investigated, assess the need for supportive/remedial measures, and implement such measures as necessary.
- C. The District's Compliance Officers and/or their designee will communicate the status and resolution of harassment complaints to students and parents according to the timelines set forth in District policies and procedures.
- D. The District's Compliance Officers and/or their designee will oversee the implementation of necessary supportive/remedial measures regarding student safety and protection from future harassment and ensure that those remedial measures are promptly communicated to affected parents and students, consistent with FERPA and other privacy laws.
- E. The District will maintain an electronic database/spreadsheet that school administrators and Compliance Officers and/or their designee will use to track all complaints (verbal or written) of harassment, intimidation, or bullying based on a protected class. This database must, at minimum, include the names of students alleged to have engaged in harassment and the alleged victim(s) of the conduct, so that the District can identify and track whether students may have been subjected to repeated offenses, assess whether they may be experiencing a hostile educational environment, and determine whether there are supportive measures that can be put in place to address that.
- F. Each semester, the District's Compliance Officers and/or their designee will review school-level discipline incidents to ensure that no incidents of harassment, intimidation, or bullying based on a protected class were missed in the District's

electronic tracking database/spreadsheet or otherwise not responded to promptly and effectively.

### **III. Training Faculty and Staff**

- A. For the 2024-2025 and 2025-26 school years, the District will develop and implement the following training:
  - 1. The District will train all employees on how to properly identify, document, and report any conduct that may constitute harassment, intimidation, or bullying based on a protected class.
  - 2. The District will train principals and other administrators who are part of the process for investigating allegations of harassment, intimidation, or bullying on:
    - i. How to conduct fair and impartial investigations, including protocols for documenting the investigation;
    - ii. When and how to implement supportive measures for students; and
    - iii. How to communicate effectively and in a timely fashion with students and families about the status and resolution of harassment complaints, consistent with FERPA and other privacy laws.
  - 3. The District will train all applicable administrators and Compliance Officers on how to accurately track information about conduct that may constitute harassment, intimidation, or bullying in the District's electronic tracking database/spreadsheet.
  - 4. The District will train all counselors on how to provide support to students who exhibit signs of depression, anxiety, self-harm, or suicidality resulting from harassment, intimidation, or bullying.
- B. The District will ensure effective implementation of the policies and practices detailed in these trainings.

### **IV. Assess and Respond to Feedback Regarding District Culture**

- A. The District will administer culture and climate surveys annually that include questions related to harassment, intimidation, and bullying based on protected classes, and the District's response to allegations of harassment, intimidation, or bullying. All parents/guardians, District and school-level staff, and students in grades 6 and above will receive questions aimed at eliciting information about the following:
  - 1. Whether students have witnessed or experienced harassment, intimidation, or bullying based on a protected class at school;
  - 2. Whether students are aware of how/when to report harassment, intimidation, or bullying based on a protected class;
  - 3. Students' experience with their school's response to harassment, intimidation, or bullying based on a protected class.

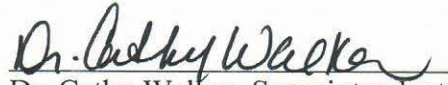
- b. Using trends and issues observed in the survey results, the District will identify areas of improvement and develop specific action plans targeted at, for example, appropriate buildings, grade levels, and/or student groups.

## **V. Tracking of Implementation**

- A. For the 2024-2025 and 2025-2026 school years, the District will provide documentation to the Board of Education and the Department demonstrating compliance with Paragraphs I through IV, above, including:
  - 1. Results of the District's semester reviews of disciplinary incidents, including any responsive action steps;
  - 2. Annual climate survey results and related action plans;
  - 3. All harassment, intimidation, and bullying complaints that were entered into the District's electronic tracking database/spreadsheet;
  - 4. Documentation of the District's investigation and response to those complaints; and
  - 5. Any other efforts by the District to prevent, investigate, and respond to harassment, intimidation, or bullying based on a protected class.
- B. The District will produce these reports twice annually: Once by January 15th, and once by June 15th.
- C. If the Department requires additional information to assess the District's compliance, it may issue reasonable requests, and the District will provide the information within 30 days.
- D. If the District timely implements and complies with this Agreement, the parties expect this matter to be resolved 60 days after the District's June 15, 2026, report if the Department has not notified the District of any compliance concerns before that date. If the Department does notify the District of compliance concerns, the parties will work collaboratively to address those issues.

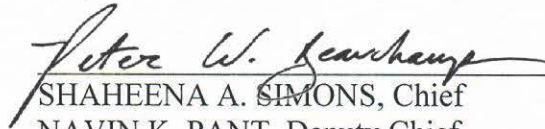
Date: 12/5/24

For Newcastle Public Schools:



Dr. Cathy Walker, Superintendent  
Newcastle Public Schools  
101 North Main Street  
Newcastle, OK 73065

For the United States:



SHAHEENA A. SIMONS, Chief  
NAVIN K. PANT, Deputy Chief  
BRIGID BENINCASA, Trial Attorney  
PETER W. BEAUCHAMP, Trial Attorney  
United States Department of Justice  
Civil Rights Division  
Educational Opportunities Section  
150 M. Street, NE  
Washington, DC 20002  
(202) 598-6855  
[Brigid.Benincasa@usdoj.gov](mailto:Brigid.Benincasa@usdoj.gov)  
(202) 746-5298  
[Peter.Beauchamp@usdoj.gov](mailto:Peter.Beauchamp@usdoj.gov)