

- TEXAS EDUCATION AGENCY -



**PLANO ISD
CDN 043-910**

SPECIAL INVESTIGATION

2025-05-0496

Report of Findings

1701 NORTH CONGRESS
AVE
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I. Introduction

Plano Independent School District (Plano ISD or district) serves students in southwest Collin County, located in the Dallas-Fort Worth Metroplex and is part of the Region 10 Education Service Center. As of October 2025, the student enrollment is over 43,900 across 4 early childhood campuses, 42 elementary campuses, 11 middle school campuses, 11 high school campuses, and 3 other learning centers. The district's most recent publicly available academic accountability rating is a B (82) for the 2024-25 school year, and the district's most recent Financial Integrity Rating System of Texas (FIRST) rating for the 2024-25 school year is A – Superior Achievement (100).

Between May and October 2025, the Texas Education Agency (TEA or agency) received multiple complaints from current and former Plano ISD parents, as well as a former board trustee, alleging incidents of antisemitism within the school district. The concerns raised included allegations related to curriculum, classroom discussions, student walkouts and attire, attendance, bullying and harassment, and accommodating religious holidays, and the district's failure to adequately address or respond to these issues. The specific allegations contained in each complaint are detailed in the "Background Information" section below. Following receipt of these complaints, the Special Investigations Division (SID) initiated a special investigation into Plano ISD and provided written notice, including a copy of SID procedures and the allegations under investigation, to the superintendent and board president on August 13, 2025.¹ The agency submitted its first request for documents to the district on August 27, 2025,² and the district responded to the allegations and request for documents on September 22, 2025.³ The agency sent

¹ Exhibit 1 – Special Investigation Notice, August 13, 2025.

² Exhibit 2 – TEA Request for Documents, August 27, 2025.

³ Exhibit 3 – Plano ISD Response to Allegations and Request for Documents, September 22, 2025.

a second request for documents on September 25, 2025,⁴ which was responded to by the district on October 20, 2025.⁵

II. **Background Information**

A. Specific Complaints

On May 21, 2025, a Plano ISD parent submitted a complaint to the agency asserting repeated instances of antisemitic harassment and behavior in the district. The allegations included information shared with the complainant by other parents in the district as well as the complainant's own concerns. TEA processed the complaint, identified as complaint 2025-05-0496,⁶ as well as another submitted in the ensuing days by the same complainant asserting a denial of parental rights as retaliation for filing the prior complaint, identified as complaint 2025-05-0540.⁷ On May 22, 2025, another parent submitted a complaint alleging antisemitism in the district as well, identified as complaint 2025-05-0604.⁸

On July 2, 2025, a former Plano ISD parent submitted a complaint alleging repeated antisemitic harassment of their student and a failure by the school district to meaningfully respond, identified as complaint 2025-07-0024.⁹ Another complaint was received on July 6, 2025, and identified as complaint 2025-07-0042,¹⁰ which alleged that a district teacher used antisemitic curriculum materials and language in class. On July 18, 2025, another Plano ISD parent submitted complaint 2025-07-0120,¹¹ alleging antisemitic materials were used in a classroom and antisemitic

⁴ Exhibit 4 – TEA Second Request for Documents, September 25, 2025.

⁵ Exhibit 5 – Plano ISD Response to Second Request for Documents, October 20, 2025.

⁶ Exhibit 6 – TEA Complaint 2025-05-0496. The agency identifies this complaint as the “primary” complaint and uses the identified complaint number on the cover page of this investigation.

⁷ Exhibit 7 – TEA Complaint 2025-05-0540.

⁸ Exhibit 8 – TEA Complaint 2025-05-0604.

⁹ Exhibit 9 – TEA Complaint 2025-07-0024.

¹⁰ Exhibit 10 – TEA Complaint 2025-07-0042.

¹¹ Exhibit 11 – TEA Complaint 2025-07-0120.

harassment by other students, including an allegation that a student club organized a meeting on October 7, 2024—the anniversary of the attack on Israel by Hamas—and demonstrated support for Palestine. The complaint alleges the district minimized the behavior and failed to meaningfully respond.

On August 7, 2025, a former district trustee submitted a complaint, 2025-08-0107,¹² which alleged that a district campus permitted a “pro-Hamas rally” during school hours and antisemitism in the district as well as broad district dismissals of the issue. On August 21, 2025, a Plano ISD parent submitted a complaint, 2025-08-0435,¹³ asserting that a district teacher had denied tenements of their family’s Judaism in class, as well as inconsistent communication about religious accommodations when scheduling grade-based school events.

B. Applicable Legal Standards

1. Legal Authority for TEA Investigations

Texas law grants the commissioner of education the authority to authorize special investigations into alleged violations of the Texas Education Code, as set forth in Tex. Educ. Code § 39.003. These investigations are governed by procedures adopted by the agency under Tex. Educ. Code § 39.004, which can be found on the agency’s website. Except as subject to exceptions identified in the Texas Education Code, investigations into conduct relating to other state and federal laws may be reserved to other agencies; where allegations involved in this investigation relate to any such laws, this report notes these limitations.

¹² Exhibit 12 – TEA Complaint 2025-08-0107.

¹³ Exhibit 13 – TEA Complaint 2025-08-0435.

2. Oversight of the District

Generally, local school districts and their respective boards have primary authority over their operations. The commissioner of education has the authority granted specifically in the Texas Education Code. Under state law, the commissioner of education may not substitute his judgment for the “lawful exercise of those powers and duties by the trustees.”¹⁴

The commissioner of education has authorized special investigations in circumstances when violations of federal and state laws occur within school districts that indicate a failure on the part of the school district’s board of trustees to “oversee the management of the district” as required by Tex. Educ. Code § 11.051(a)(1). Although it is the primary authority of the school district’s superintendent and ultimately its board of trustees to oversee its teachers, the commissioner of education is obligated to ensure the enforcement of the Texas Education Code, including that school boards of trustees perform their responsibility of district oversight and ensure their staff’s compliance with state and federal law.

3. Curriculum and Controversial Topics

School districts are obligated by state law to meet certain curriculum standards with their chosen curriculum.¹⁵ This includes ensuring that school curriculum meets the Texas Essential Knowledge and Skills (TEKS) identified in rule by the State Board of Education (SBOE).¹⁶ In recent years, the Texas Legislature has also addressed the possibility of controversial subjects being brought up in classrooms by teachers. Specifically, Tex. Educ. Code § 28.0022(a) states that “for any course or subject... for a grade level from kindergarten through grade 12: (1) a teacher may not be compelled to discuss a widely debated and currently controversial issue of public policy

¹⁴ Tex. Educ. Code § 11.151(b).

¹⁵ See Tex. Educ. Code § 28.002.

¹⁶ 19 Tex. Admin. Code Chs. 110-128.

or social affairs; (2) a teacher who chooses to discuss a topic described by Subdivision (1) shall explore that topic objectively and in a manner free from political bias....” The immediate jurisdiction to address a classroom teacher’s failure to adhere to these standards is the school district’s, but the commissioner of education is obligated to respond if the district fails to enforce state law.

4. Bullying and Harassment

School district boards of trustees are required under Tex. Educ. Code § 37.001 to adopt a student code of conduct. This code of conduct must “prohibit bullying, harassment, and making hit lists and ensure that district employees enforce those prohibitions.”¹⁷ The district superintendent’s duties include “ensuring: (A) adoption of a student code of conduct as required under Section 37.001 and enforcement of that code of conduct; and (B) adoption and enforcement of other student disciplinary rules and procedures as necessary.”¹⁸ School boards are then obligated by law to supervise the superintendent.¹⁹

In addition, pursuant to Tex. Educ. Code § 37.0832, school district boards of trustees are required to adopt policies and procedures addressing bullying and cyberbullying. The adopted policy must include, among other requirements, establishing procedures for reporting bullying, notifying parents, and investigating the alleged conduct.

The Plano ISD Student Code of Conduct (SCOC) from school years 2023-24 through 2025-26 prohibits the engagement in “bullying, cyberbullying, harassment, or making hit lists.”²⁰ The SCOC for the 2023-24 and 2024-25 school years permitted student suspension for any violation of the SCOC including bullying and harassment, and allows for placement in the district’s

¹⁷ Tex. Educ. Code § 37.001(a)(7).

¹⁸ Tex. Educ. Code § 11.201(d)(12).

¹⁹ See Tex. Educ. Code § 11.1511(b)(4).

²⁰ Exhibit 14 – Plano ISD Student Code of Conduct (2023-24, 2024-25, 2025-26).

Disciplinary Alternative Education Program (DAEP) or expulsion if a student engages in bullying that “encourages a student to commit or attempt to commit suicide” or incites “violence against a student through group bullying.” In school year 2025-26, the SCOC was amended to include classroom removal by a teacher for bullying behaviors, in accordance with legal changes from House Bill (HB) 6, 89th Texas Legislature. The board of trustees also has adopted policies FFI (Legal) and FFI (Local), which address bullying and cyberbullying as required under Tex. Educ. Code § 37.0832.²¹

5. Accommodating Religious Holidays

Tex. Educ. Code § 25.087(b)(1)(A) requires a district to excuse a student absence for observance of a religious holiday. A student may not be penalized for this absence and must be allowed a reasonable amount of time to make up school work that was missed during that time.²²

6. Title VI Discrimination

Recipients of federal funds—including Plano ISD—are obligated to comply with federal civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI). Title VI provides that “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”²³ The commissioner of education may authorize a special investigation to be conducted “in response to complaints submitted to the agency with respect to alleged violations of civil rights or other requirements imposed on the state by federal law....”²⁴

²¹ Exhibit 15 – Plano ISD Board Policy FFI (Legal and Local)

²² Tex. Educ. Code § 25.087(d).

²³ 42 U.S.C § 2000d.

²⁴ Tex. Educ. Code § 39.003(a)(3).

In *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, the U.S. Supreme Court articulated the controlling framework for assessing claims of determining intentional discrimination.²⁵ The Court identified a non-exhaustive set of evidentiary factors relevant to determining discriminatory intent, including: the historical background of the challenged decision; the specific sequence of events preceding the decision; departures from normal procedures or substantive conclusions; and the relevant administrative history.²⁶ These considerations guide the inquiry into whether race, color, or national origin was a motivating factor in the development or implementation of the district's policies, procedures, or administrative actions.

Beyond intentional discrimination, a school district's failure to adequately respond to student-on-student harassment may also give rise to liability under Title VI. Although the U.S. Supreme Court has not directly addressed peer harassment or discrimination in the Title VI context, in *Davis v. Monroe County Board of Education*, the Court held that discrimination under Title IX—similarly worded in its meaningful respects to Title VI, prohibiting discrimination in federally funded programs on the basis of sex—may be found when the recipient of federal funds “acts with deliberate indifference to known acts of harassment in its programs and activities.”²⁷ The harassment itself must also be “so severe, pervasive, and objectively offensive that it effectively bars the victim's access to an educational opportunity or benefit.”²⁸ In those circumstances, the Court found that a school district could be found liable under Title IX for its own decision to “remain idle” in the face of student-on-student harassment.²⁹

²⁵ *Village of Arlington Heights v. Metropolitan Housing Dev. Corp.*, 429 U.S. 252 (1977).

²⁶ *Id.* at 266-68.

²⁷ *Davis v. Monroe County Board of Education*, 526 U.S. 629 (1999).

²⁸ *Id.* at 633.

²⁹ *Id.* at 641.

The Court has held that “... Congress modeled Title IX after Title VI of the Civil Rights Act of 1964, ... and passed Title IX with the explicit understanding that it would be interpreted as Title VI was In the absence of any contrary evidence, it follows that Congress intended Title IX to be interpreted similarly....”³⁰ The agency therefore uses the *Davis* standard to determine relevant allegations of discrimination based on race, color, or national origin in this case.

III. Methodology

A. Documentary Evidence Review

TEA collected and reviewed documentary evidence relevant to the allegations. Investigators examined Plano ISD’s response to the allegations, the district timeline regarding its response to antisemitism allegations, bullying prevention policies and protocols, secondary academics curriculum expectations, curriculum management plan, materials selection rubric, email communication, instructional resources, district board policies, district walkout guidance for principals, the district attendance manual, and other relevant materials.

B. Witness Interviews

Investigators conducted interviews with individuals possessing knowledge relevant to the allegations. Interviewees included district administrators, campus principals, teachers, members of the board of trustees, and parents and community members who reported concerns. A total of thirty-nine interviews were conducted. These interviews were digitally recorded and transcribed, and the recordings and transcripts were maintained as part of the investigative record.

³⁰ *Fitzgerald v. Barnstable Sch. Comm.*, 555 U.S. 246, 258-59 (2009).

C. Evidence Triangulation

Investigators analyzed the records and triangulated the documentary evidence, witness interviews, and applicable statutory and administrative requirements. Each allegation was evaluated by comparing interview statements and documentary evidence against the relevant provisions of the Texas Education Code, applicable administrative rules, and district policies governing curriculum standards, student attendance procedures, student expression and dress, and bullying prevention requirements.

This comparative analysis allowed investigators to assess whether the available evidence demonstrated compliance or noncompliance with the applicable legal standards.

IV. Allegations

A. Findings of Fact

The agency received multiple allegations of antisemitism within the district, including reports related to curriculum, classroom discussions, student walkouts and attire, incidents of bullying and harassment, and accommodating religious holidays. While certain subject areas are governed directly by the Texas Education Code, other matters fall within the scope of local district policy. Accordingly, the agency evaluated allegations to determine whether any conduct is a violation of state law and to assess whether, collectively, the allegations establish that the board of trustees has failed to “oversee the management of the district” in violation of Tex. Educ. Code § 11.051(a)(1).

To maintain required legal confidentiality standards, this report anonymizes some information in text as well as in the exhibits. Additionally, some circumstances of alleged bullying behavior have been grouped to avoid impermissibly providing personally identifiable information in violation of the Family Educational Rights and Privacy Act (FERPA).

One complainant submitted a list of allegations involving multiple schools, noting that some of the incidents had been reported to him but not to the district for fear of retaliation or that the district would not act. The complainant acknowledged that the “vast majority” of the listed incidents did not include dates.³¹ Because several allegations lacked essential details—such as dates and parent, student, and/or teacher names—investigators were unable to gather additional information or further evaluate those concerns.

1. Curriculum and Instruction

a. District Processes

Investigators reviewed the district’s selection process for curriculum through documentation provided as well as through interviews with district staff. According to staff, the district begins the curriculum selection process by reviewing the materials on State Board of Education (SBOE) approved selection lists to ensure alignment with the TEKS. Beginning with that framework, staff then form committees with teachers and administrators to make curriculum selections. The district described the makeup of the committees studying the materials for selection—the selections typically occur on a rotating basis by subject area—which compares the options to their own rubric before selecting an option. Once the selection is made, the community is more broadly provided with an opportunity to review the materials and board policy provides a formal process for parents or community members to request reconsideration of selected instructional materials.^{32 33 34}

Beyond the district-wide adopted curriculum, Plano ISD Policy EFA (Local) also addresses supplemental resources. Specifically, the board policy states that “District professional staff may

³¹ Exhibit 16 – Memo from Parent Regarding Antisemitism Incidents at Plano ISD.

³² Exhibit 17 – SID Interview, Lisa Wilson, 03:48-10:21.

³³ Exhibit 18 – SID Interview, Kristin Hebert, 03:57-16:39.

³⁴ Exhibit 19 – Plano ISD Board Policy EFA (Local) (2022-24, 2024-26, 2026-Present).

select additional instructional materials in accordance with administrative regulations and the criteria above.” The policy also notes that “[s]election of instructional materials is an ongoing process that includes the removal of materials no longer appropriate....” In 2024, the following sentence was added to the policy: “[t]he campus principal shall ensure the District process has been followed for any supplemental material used on the campus.”³⁵

Investigators interviewed the district’s executive director of secondary academics, Kristin Hebert, who described the process for teachers who want to bring supplemental resources into the classroom.³⁶ All classroom teachers are expected to use a “materials selection rubric” to assess the material’s suitability. The review must be conducted with the “collaborative team.” If the resource is considered to have only “partially” met the criteria in the rubric, then it must be reviewed and receive documented approval by the campus principal prior to classroom use. The rubric requires an evaluation of possible copyright concerns, alignment to curriculum standards, appropriateness to subject and students, accuracy and currency of the resource, credibility, representation, and viewpoint neutrality.³⁷ Staff also receive training at the beginning of the school year, with additional training provided throughout the year as necessary.³⁸

b. January 2024

A parent contacted the superintendent of Plano ISD on January 15, 2024, to describe several concerns with upcoming topics to be covered in their child’s world geography class at Shepton High School. The parent indicated that they had already contacted the teacher of the course to report their concerns and was dissatisfied with the teacher’s response. Specifically, the parent was concerned that the course would cover the Israeli-Palestinian conflict over a three-day

³⁵ Exhibit 19 – Plano ISD Board Policy EFA (Local) (2022-24, 2024-26, 2026-Present).

³⁶ Exhibit 18 – SID Interview, Kristin Hebert, 11:19-13:58.

³⁷ Exhibit 20 – Plano ISD Materials Selection Rubric.

³⁸ Exhibit 17 – SID Interview, Lisa Wilson, 7:13-740; Exhibit 21 – SID Interview, Eric Haggard, 2:26-2:34.

period, would discuss the five pillars of Islam, and would include the use of a film entitled “Salam Neighbor.” The parent indicated that they had contacted the campus principal to allow their child to sit out during the sections of curriculum that concerned them and that they were requesting that the district does an internal review of its curriculum.³⁹

The campus principal contacted the parent on or around January 18, 2024, summarizing a visit with the parent. The principal indicated that the student would be completing a separate assignment and would not be attending the relevant classroom days. The principal indicated that a staff member would also be sending the parent a copy of the curriculum for their review. Additionally, the principal stated that the referenced video would not be used in class. The district chief learning officer also spoke with the parent on the same day. Both the district administrator and the campus principal acknowledged that the film proposed was not a district-approved resource and that it would not be used in class.⁴⁰

The parent contacted the superintendent on that same evening to express that they were dissatisfied with the resolutions offered, but they would accept an alternate assignment for their student. The parent acknowledged that the Texas Education Code and TEKS supports “religious discussion.” The parent expressed concern that the district’s teacher had chosen the Arab-Israeli conflict to address the relevant TEKS learning objectives instead of other current or past world conflicts.⁴¹

Investigators interviewed the Shepton High School principal, who did not recall this specific situation, but described the process if a parent objected to certain subject matter. She indicated that a parent could contact her to request their child have a different assignment or be

³⁹ Exhibit 22 – Parent Email to Superintendent, January 15, 2024.

⁴⁰ Exhibit 22 – Parent Email to Superintendent, January 15, 2024.

⁴¹ Exhibit 22 – Parent Email to Superintendent, January 15, 2024.

removed from participation in a specific topic and the campus would make adjustments for that child.⁴²

c. August 2024

On August 22, 2024, a parent contacted the district with information indicating that a world history teacher at Jasper High School had used non-district approved materials which referred to the land in present-day Israel as Palestine during the Mesopotamian Era.⁴³ The materials were provided as a resource for students, not presented in the classroom. The superintendent and board president responded on the same day indicating that staff would investigate the matter. On August 26, 2024, a deputy superintendent followed up with the parent. The deputy superintendent acknowledged that the materials were not appropriate and that they had not been approved by the district. The deputy superintendent indicated in her response that the district had “removed [the materials] from use for all teachers of that team.” The parent thanked them for the “prompt action and response.”

Investigators interviewed the teacher and he stated that shortly after covering the topic of the Fertile Crescent, district staff met with him to discuss the complaint.⁴⁴ He indicated that he had been unaware of the appropriate terms to use to refer to the relevant land area during the Mesopotamian Era and acknowledged that that was his fault. He stated that the materials that he had provided he thought had received district approval as the department had been using them for years. However, he indicated that it had not been updated in several years.

⁴² Exhibit 23 – SID Interview, Courtney Washington, 17:08-21:26.

⁴³ Exhibit 24 – Parent Email to Jasper HS Teacher, August 22, 2024.

⁴⁴ Exhibit 25 – SID Interview, Steve Coy, 13:49-16:21.

d. May 5, 2025

On May 5, 2025, a parent reported to the Robinson Middle School principal that a substitute teacher had played verses from the Quran during class.⁴⁵ The parent indicated that this behavior was not an “isolated incident” with this substitute, but they did not provide further information. The principal responded, thanking the parent for bringing this to her attention, and indicating that although they do not oversee substitute teachers, they are able to “address” the concern.⁴⁶

e. May 21, 2025

On May 21, 2025, a parent contacted a teacher at Clark High School in Plano ISD, stating that they had come across a slide deck while helping their student study for an exam.⁴⁷ The deck was set up as a Jeopardy-style quiz game in which statements are made and students would include a question in response. One slide stated, “Group who wants to gain back the country they lost to Israel” with the response question being, “Who are the Palestinians?”⁴⁸ The parent asked if the teacher had created the deck or if the district had provided it and what country the quiz was referencing. The teacher stated that the resource was created by “teachers” and was based on the United Nations partition plan. The teacher asked if anything needed to be changed and stated that the parent could reach out with questions or suggestions. The parent informed the teacher that there had never been an internationally recognized country of Palestine and asked her to “fix this error.” The teacher responded, “I’ll definitely share it with the team and will share is [*sic*] with the district over the summer. I’ll take care of that slide asap. Thank you so much.”⁴⁹

⁴⁵ Exhibit 26 – Parent Email to Robinson MS Principal, May 5, 2025.

⁴⁶ The agency was unable to obtain additional information necessary to further evaluate how the campus responded to the allegation.

⁴⁷ Exhibit 27 – Parent Email to Clark HS Teacher, May 21, 2025.

⁴⁸ Exhibit 28 – Clark High School Quiz Game.

⁴⁹ Exhibit 27 – Parent Email to Clark HS Teacher, May 21, 2025.

Investigators interviewed this teacher about the use of this slide in the classroom. She stated that she had not developed the slide, it was stored in a shared drive for the world geography team to use. She had not used the slide deck in the classroom, but instead she had provided it as a resource tool in her classes' Google Classroom. The teacher acknowledged that she failed to use the rubric for additional materials shared and that by doing so she had violated district protocol. She stated that she did not have the opportunity to determine whether the parent was satisfied with her revisions—removing the referenced slides from the deck—as the parent had only observed the slides as they were helping their student study for finals, right at the end of the school year.⁵⁰ The teacher provided to the investigators the TEKS standard that the slide deck was intended to address, which requires students “assess causes and effects of conflicts between groups of people, including modern genocides and terrorism.”⁵¹

Investigators also interviewed Eric Haggard, the coordinator for social studies at the district. He indicated that the teacher was counseled by himself and campus administration about the inflammatory language and that it was “immediately pulled” from use. He stated that the district reviewed to see if any other teachers had stored or posted the resource from the shared file and that it was not in use by any other teachers.⁵² The teacher showed investigators the disciplinary notice that she received as a result of her noncompliance, and a district administrator confirmed that a write up was placed in the teacher’s personnel file.⁵³

f. August 2025

On August 21, 2025, a parent submitted a complaint to the agency relating to a classroom discussion that occurred during their student’s social studies class at Renner Middle School in the

⁵⁰ Exhibit 29 – SID Interview, Gurpreet Panesar, 11:45-15:30.

⁵¹ Exhibit 30 – Clark HS Teacher Provided Document. See also 19 Tex. Admin. Code § 113.43(d)(18)(b).

⁵² Exhibit 21 – SID Interview, Eric Haggard, 36:57-38:52.

⁵³ Exhibit 18 – SID Interview, Kristin Hebert, 22:14-23:51.

2023-24 school year. According to the parent, after their student shared about the Jewish exodus from Egypt, the teacher stated that there was no “documented proof” of the story. The parent expressed that the statements made by the teacher were the “equivalent to stating that Judaism is only a myth.” The parent acknowledged that they did not report the incident to campus or district administration at the time of the incident, or thereafter.⁵⁴

g. Assigned In-Class Reading

A complainant provided second-hand information regarding a book (“Refugee” by Alan Gratz) available in a classroom at Frankford Middle School that referenced a character wearing a keffiyeh and stated that the character expressed that he was “forced to leave my home in 1948 during the first Arab-Israeli war.”⁵⁵ The character stated that “someday, when my homeland is restored, I will go home again!” The complainant stated that the students were not allowed to take the book home but were assigned it for in-class reading.

Investigators interviewed district staff regarding the allegation. The deputy superintendent indicated that the district’s chief learning officer, who was no longer with the district, had addressed that situation. Specifically, after investigating, the district did not find that the book was not allowed to be taken home by students. District staff stated that they offered an alternate book for the student to read, but the parent did not find it necessary. The book was not removed from the classroom, staff reviewed the content and felt that the quotation flagged was offering one character’s perspective, but the book itself was not antisemitic. The deputy superintendent noted that the book in question had received the National Jewish Book Award for young adult fiction in 2017.⁵⁶

⁵⁴ Exhibit 13 – TEA Complaint, 2025-08-0435.

⁵⁵ Exhibit 16 – Memo from Parent Regarding Antisemitism Incidents at Plano ISD; See also Exhibit 31, Photos of Book Excerpts.

⁵⁶ Exhibit 17 – SID Interview, Lisa Wilson, 21:32-22:55.

h. Maps in Classrooms and Curriculum

The complainants provided several photos of maps and other resources used in a Humanities class at Vines High School which referenced Palestine or failed to reference Israel. One classroom resource appears to be referencing religious thinkers and philosophers in a table that lists the person, date, location and associated religion or philosophy. When referencing the Hebrew prophets, the location states, “Eastern Mediterranean/Palestine/Israel.” The same complainant provided excerpts from a textbook—*Ways of the World: A Brief Global History*—which included a map of the Middle East picturing the Fertile Crescent. The map includes the label “Palestine” as did text portions of the textbook.⁵⁷ The complainant, who received this information from another person, reported that the district pulled the materials after they were shared, but no additional information, including the teacher who posted the materials, was provided about this allegation for further evaluation or follow up by investigators.⁵⁸

2. Walkouts and Attire

a. October 2023

On October 24, 2023, a community member sent correspondence to Principal Williams expressing concern regarding the walkout at McMillen High School on October 19, 2023 and attaching a link to a video in which students were chanting “Free, Free Palestine.” The community member requested that the Muslim Student Association (MSA) club sponsor be disciplined and that the MSA club be disbanded. Mr. Williams responded to the email and stated that the students who participated in the chanting “did so on their own accord” and were spoken to about how their words and actions affect others. He also stated that the demonstration took place within the

⁵⁷ Exhibit 32 – Photos of Instructional Resources at Vine HS.

⁵⁸ Exhibit 16 – Memo from Parent Regarding Antisemitism Incidents at Plano ISD.

“guidelines and parameters established to ensure that the demonstration [did] not result in disruption to the school environment.”^{59 60}

Investigators found that McMillen High School staff sent correspondence to the families of all its students. The letter explained that a walkout occurred and that once it started, students were asked to gather in a specific area and “to complete their demonstration in a timely manner.” The letter also stated that the event was conducted “peacefully and without incident and students remained safe” and that the walkout was “brief and orderly.” The letter specifically stated that students may exercise their First Amendment rights, but that the school, although it would not “prevent” student expression, also would not participate or promote it and would require that demonstrations not “materially and substantially interfere with school operations.”⁶¹

Investigators interviewed David Jones, the Plano East High School principal. Jones stated that he was approached by a student who indicated that they wanted to have a student demonstration. He met with a student to discuss the planned demonstration and heard that it was intended to be in support of “the Palestinian people.” He stated that he made clear to the student that the demonstration could not target any particular group and the student reiterated that it was to support “refugees.” He stated that he made it clear that district policy required that any student demonstrations follow specific time, place, and manner restrictions to avoid disruption of the school environment and ensure student safety. He stated that the campus restricted student demonstrations to 20 minutes, beginning at the start of a passing period. Students were told to gather in the back of the campus to avoid “stoppage” in more high traffic areas. He arranged for extra police presence on the day of the demonstration and to ensure that the district safety and

⁵⁹ Exhibit 33 – Parent Email to Principal Williams, October 24, 2023.

⁶⁰ See also Exhibit 34 – Plano ISD Walkout Protocol.

⁶¹ Exhibit 35 – McMillen HS Correspondence to Families, October 19, 2023.

security team were there to supervise. Jones estimated that 80-100 students showed up at the Plano East High School demonstration. He felt that the demonstration was “very orderly.” According to Jones, students who attended the demonstration and were subsequently late to their next class received an unexcused absence.⁶² Like McMillen High School, following the walkout, Plano East High School sent a letter to families of all its students regarding the student walkout.⁶³

In a follow-up with the district, the agency requested attendance records for the walkouts at Plano East HS and McMillen HS that occurred on October 18 and 19, 2023, respectively, to determine whether students who participated in the walkouts were assigned unexcused absences. Plano East HS attendance records reflect that 168 students were marked “AOC” (absent on campus). The vast majority of these records contain either a notation reflecting that a student was with Dr. Eppler, an associate principal, or “demonstration.”⁶⁴ The district also provided attendance records for McMillen High School, but noted that the walkout at McMillen occurred during a designated advisory period (rather than during instructional time), and that it is “not clear as to who was absent, tardy, or otherwise due to the student walkout.”^{65 66}

b. October 2024

On October 7, 2024, a parent emailed Jasper High School Principal Brooks Baca stating that he had heard third-hand that the campus’ Muslim Student Association (MSA) held a meeting on the anniversary of the October 7, 2023 attack on Israel by Hamas. He stated that at the meeting, students wore the keffiyeh and “Palestine T-shirts.” He expressed concern that this indicated the students and the faculty sponsor supported terrorism.⁶⁷

⁶² Exhibit 36 – SID Interview, David Jones, 22:24-25:59.

⁶³ Exhibit 37 – Plano East HS Correspondence to Families, October 18, 2023.

⁶⁴ Exhibit 38 – Attendance Records for Plano East HS.

⁶⁵ Exhibit 39 – Plano ISD Response to TEA, April 8, 2026.

⁶⁶ Exhibit 40 – Attendance Records for McMillen HS.

⁶⁷ Exhibit 41 – Parent Email to Principal Baca, October 7, 2024.

On October 8, 2024, Baca responded to the parent indicating that any students who wore clothing to the school did so independently of the MSA.⁶⁸ Investigators interviewed Baca, who stated that after the parent contacted him, he immediately met with the MSA club sponsor who stated that no formal meetings had occurred on that day and she had not observed a meeting of the MSA. Additionally, he stated that he would not have suggested or condoned any form of demonstration or coordination on that date. He indicated that he spoke with MSA students and accessed the online software that the club used to issue information about activities to ensure that there were not ongoing discussions about organizing a meeting or the wearing of specific clothing on that date. He indicated that he had personally observed a “handful” of three to five students wearing the keffiyeh over the course of that day.⁶⁹

In his October 8, 2024 email, the principal informed the parent that the campus had not been able to identify any “school-sponsored activity” and that individual students could express themselves through their attire unless it caused a “substantial disruption to the educational process.”⁷⁰

A community member contacted the district superintendent, Theresa Williams, on October 18, stating that he had heard that the MSA at Jasper High School had an after-school meeting on October 7 on the school grounds, where Muslim students wore keffiyehs and Palestine t-shirts. The superintendent’s chief of staff responded and let the community member know that the district was still investigating, but that the district had no evidence that a meeting had occurred or that clothing coordination happened. The staffer indicated that the district had not received any “reports of any students actually wearing the clothing items, nor any disruptions at Jasper High School”

⁶⁸ Exhibit 41 – Parent Email to Principal Baca, October 7, 2024.

⁶⁹ Exhibit 42 – SID Interview, Brooks Baca, 6:10-10:46.

⁷⁰ Exhibit 41 – Parent Email to Principal Baca, October 7, 2024.

and requested any specific evidence, as well as the names of specific student or staff witnesses, be provided. The community member responded, but he did not provide additional evidence about the alleged incident to the district in that email. He did state that he had interpreted the follow-up email from Principal Baca stating that there was no “school-sanctioned activity” to be an admission that there was a meeting, but that the meeting was not sponsored by the school.⁷¹

Baca told investigators that a group of Muslim students—he estimated an average of about 50-60 students—participated to gather to pray at the campus on a daily basis and that they did so on October 7, 2024 as well. He stated that students who chose to pray do so during a passing period to avoid disrupting class or missing instruction. He was uncertain if this was the “meeting” that the parent said was observed because no student who directly witnessed the alleged meeting ever provided a description of what they observed to the district.⁷²

3. Bullying and Harassment

a. Incident A

Beginning in October 2023, Parent A states that their student (Student A) began experiencing antisemitic bullying and harassment at school from other students at Plano West High School.⁷³ Investigators interviewed Parent A who stated that students sent antisemitic messages to the student, threw coins at him in the changing rooms, and told him to “go to the gas chambers” and “go die in Israel.” Parent A stated that the student eventually informed the parent of the harassment.⁷⁴ On May 4, 2024, Parent A emailed her child’s school counselor that “things have been said to my son...that are unacceptable and need to be addressed. He needs to meet with you ASAP to discuss the matter but he does not feel it is safe returning to” his shared extracurricular

⁷¹ Exhibit 43 – Community Member Email to Superintendent Williams, October 18, 2024.

⁷² Exhibit 42 – SID Interview, Brooks Baca, 8:27-12:14.

⁷³ Exhibit 9 – TEA Complaint 2025-07-0024.

⁷⁴ Exhibit 44 – SID Interview, Parent A, 00:50-2:23.

activity. The counselor forwarded the concern to an assistant principal and stated that she met with Student A and “he explained that he was being sent anti-semitic remarks from students he thought were his friends.” The counselor went on to write that Student A told her that he did not want to talk to the coach about the matter and requested to be dropped from the class. She stated that “he did not share any names or give me any specifics.” She stated that Parent A emailed her the following day thanking her for “taking care” of Student A. She expressed that she was “trying to honor his [Student A’s] request to keep this matter low key.”⁷⁵

Parent A indicated to investigators that she was dissatisfied with how the counselor responded to the student’s concerns. She felt that the counselor “didn’t want to hear any of the antisemitism, she didn’t want to know. She just said, ‘no, no, no, no, I’ll pull you from the...team. You don’t need the credit, you’re graduating on time.’”⁷⁶ Following the discussion with the counselor, a family friend filed a complaint with the district on Parent A’s behalf on May 15, 2024.⁷⁷ At that point, the Plano West High School assistant principal contacted the parent and spoke with the student. The student stated in an email to campus administration on May 16, 2024 that he had received a swastika and multiple threats, including, “I genuinely hope you die in Israel,” “Please kill yourself,” and “You are just a fat jew.”⁷⁸

The assistant principal at Plano West High School began an investigation and interviewed Student A. District administration reached out to the assistant principal on May 16, 2024, requesting to be updated on the outcome of the investigation and offered to assist with the investigation, if needed.⁷⁹ The assistant principal stated that “it looks like it’s a doozy.”

⁷⁵ Exhibit 45 – Parent A Email to Counselor.

⁷⁶ Exhibit 44 – SID Interview, Parent A, 1:40-3:43.

⁷⁷ Exhibit 46 – District Administration Email to West Plano Assistant Principal, May 15, 2024.

⁷⁸ Exhibit 47 – Student A Email to West Plano Assistant Principal, May 16, 2024.

⁷⁹ Exhibit 46 – District Administration Email to West Plano Assistant Principal, May 15, 2024.

The assistant principal sent letters to the families of the students being investigated. The letter noted that the district had implemented a safety plan.⁸⁰ Parent A told investigators that the students were to stay away from Student A. The parent reported that after the investigation began, students in a group chat confronted Student A about the allegations.⁸¹ Those texts were shared with the assistant principal, which included, “[s]top telling ppl u quit bc we were anti semetic buddy” and “[s]top playing a jewish victim card.”⁸²

According to Parent A, students continued to violate the stay-away agreement and while it was her understanding that the assistant principal addressed the violations with students during the investigation, they were not punished for their failure to follow it. She stated that her child eventually had to drop out of an extracurricular activity due to the harassment. At the end of the semester, it was her understanding that the assistant principal left the district and she never found out how the investigation ended. She stated to investigators that the students who harassed her child were never punished.⁸³

Investigators reviewed materials related to this case, including a photo of a message that appears to be from these students and directed at Parent A’s student. The photo shows a swastika being sent in a group chat to the student with the caption, “ur country is dying p**** go save it.”⁸⁴

In a May 28, 2024 closure letter to Parent A, the investigating assistant principal stated that the investigation had included “personal interviews of witnesses and an analysis of other information or documents related to the allegations.”⁸⁵ The other students were interviewed and they each expressed that “there were inappropriate comments back and forth made by all parties

⁸⁰ Exhibit 48 – Plano West HS AP Letters to Parents about Investigation, May 21, 2024. The three students are identified as Student E, Student F, and Student G for purposes of this investigation.

⁸¹ Exhibit 49 – Photos of Student Group Chats. See also Exhibit 44 – SID Interview, Parent A, 2:42-3:22.

⁸² Exhibit 49 – Photos of Student Group Chats.

⁸³ Exhibit 44 – SID Interview, Parent A, 2:59-3:28 and 5:43-7:17.

⁸⁴ Exhibit 50 – Student Chat.

⁸⁵ Exhibit 51 – Plano West HS Investigation Closure Letter to Parent A, May 28, 2024.

involved.”⁸⁶ The conclusion was that the allegation of bullying was not sustained. The district investigation report provided to the investigators indicated that the district did not find there to be an “imbalance of power” between the students involved in the allegation, which is an element of bullying as defined in state law.⁸⁷ Additionally, the report indicated that the behavior was not found to have created an “intimidating educational environment” or infringed on the “rights of victim at school.”

The closure letter to Parent A stated that staff had counseled the involved students to “stop using online platform, snapchat, inappropriately to communicate with each other.”⁸⁸ The letter provided the parent with information regarding a possible Level I appeal of the result as well as information about how to initiate a complaint with the United States Department of Education, Office for Civil Rights. Similar letters were sent on the same day to the parents of students named in Student A’s allegations to the district.⁸⁹

b. Incident B

On January 16, 2025, after school hours, a parent of another student at Plano West High School—Parent B—reported bullying of her child by some of the same students involved in Incident A.⁹⁰ The campus behavior coordinator responded on the same evening and indicated that she would begin an investigation, have the students sign a stay-away agreement, and ensure the student could make a schedule change. The following day, the coordinator sent another email to Parent B indicating that she met with the student and walked him to the counselor’s office during a shared class with the other students to facilitate a schedule change for the student. The

⁸⁶ Exhibit 52 – Plano West HS Investigation.

⁸⁷ See Tex. Educ. Code § 37.0832.

⁸⁸ Exhibit 51 – Plano West HS Investigation Closure Letter to Parent A, May 28, 2024.

⁸⁹ Exhibit 53 – Plano West HS AP Letters to Parents with Findings, May 28, 2024.

⁹⁰ Exhibit 54 – Parent B Complaint to Plano West HS, January 16, 2025.

coordinator also indicated in the email that she was attaching the initial investigation letter and that she would email the findings within the next 10 school days.⁹¹ The parent responded, indicating that one of the students yelled at her child in the parking lot as they were leaving the school that day and the coordinator indicated that they would include that incident in the investigation.

Investigators reviewed the student statements. These statements addressed the prior allegations involving Student A, in which this second student indicated he (Student B) witnessed antisemitic incidents directed at Student A, including that others would “draw nazi swastikas in the locker room and call him [Student A] Jew.”⁹² Student B stated that he had informed the district of what he observed during the prior investigation.

Regarding the current incident, he stated that he had been walking on campus on or around January 13, 2025, when he heard one of the students who had harassed Student A—Student E—yell “f***ing k***” at him from a car.⁹³ In a statement later that week, Student E stated that he had yelled Student A’s name from his car, but he did not call him a slur. The coordinator also interviewed a student who witnessed the interaction and who stated that “both students were yelling profanities at each other.”⁹⁴ Then, on January 15, 2025, Student B was at a school event sitting behind one of the students accused of bullying, Student G. Student B had texted a student a “meme” and Student G stood up and loudly stated that Student B had “child pornography on his phone.” A verbal altercation took place, after which Student G slapped Student B in the face. Student B stated that he immediately left the school event. The school also received a written statement from Student G, who stated that Student B was showing images of a nude child from his

⁹¹ Exhibit 54 – Parent B Complaint to Plano West HS, January 16, 2025.

⁹² Exhibit 55 – Student Statements from Student B Investigation.

⁹³ Exhibit 55 – Student Statements from Student B Investigation.

⁹⁴ Exhibit 56 – Incident Report, January 15, 2025.

phone at the school event. He stated that when Student B continued to show the photo despite him telling him to “get that out my face” before slapping Student B.⁹⁵ During the following school day, January 16, 2025, Student B stated that students began filming him in the locker room and repeatedly calling him a “pedo.” He went to his vehicle and contacted his parent before going to campus administration. Later that day he stated that one of the same students harassed him and a friend in the parking lot of the school, yelling “do you guys know you are walking with a pedophile.”⁹⁶

On or around January 21, 2025, one of the students, Student E, signed a stay-away agreement, intended to enforce separation from Student B, that was in effect from that date to the end of the semester.⁹⁷ On January 23, 2025, Student E was interviewed about the phone incident and brought up an incident that occurred in the locker room. Student E alleged that Student B had been talking in the locker room about Palestine being bombed and had looked at him. He indicated that he was not Palestinian and stated that Student B said, “you’ll [sic] are all the same.” Student E then acknowledged that he responded by saying “and you are f***ing Jewish.” He then stated that Student B called him a “terrorist and bomber” and after that everyone was “laughing,” and they went to practice together. He felt that it was “always a joke. It was never seriously said. We all used funny tones.” Student E stated that it was his opinion that Student B only made the bullying allegations because he was angry that the students had reported him for showing the inappropriate images at the school event.⁹⁸

⁹⁵ Exhibit 55 – Student Statements from Student B Investigation; Exhibit 56 – Incident Report, January 15, 2025.

⁹⁶ Exhibit 56 – Incident Report, January 15, 2025; Exhibit 55 – Student Statements from Student B Investigation.

⁹⁷ Exhibit 57 – Stay Away Agreements between Student B and Student E. See also Exhibit 54, in which the coordinator states on January 16, 2025, that she will have students sign stay-away agreements.

⁹⁸ Exhibit 55 – Student Statements from Student B Investigation.

On January 22, 2025, Student B was interviewed by an administrator.⁹⁹ In his statement to the interviewer, he indicated that he had not “heard anything” further from the students. He stated that he had been called a “f***ing Jew” throughout the fall semester by one student and that sometimes he responded and sometimes he said nothing. He also told the administrator that he agreed to the back and forth bantering where he had participated in name calling, using terms like “terrorist” or “bomber,” and initiated the Israel/Palestine conversation that resulted in an antisemitic name calling. On January 28, 2025, the school had Student B sign a stay-away agreement to avoid Student E for the semester as well.¹⁰⁰

The district collected statements from other student witnesses.¹⁰¹ One student stated that Student B had looked at Student E during the conversation about Israel and Palestine in the locker room and Student B said, “your people bombed Isrial [*sic*].” When Student E said that he was from Iran, Student B said, “same thing” and Student E responded, “shut up, Jew.” The witness said that it was stated in a “joking way” and “we all laughed.”

The campus behavior coordinator completed the investigation into Incident B in early February 2025.¹⁰² The administrator held conferences with Student E and their parent and Student E received a day of in-school suspension for “harassment due to victim’s religion.”

c. Incident C

In January 2024, Parent C reported that Student C had been bullied in the agriculture barn, which is a shared facility with multiple schools. It was reported that another student had sent a message telling Student C to kill herself, stating “Go die Jew,” along with additional insulting remarks and behavior toward Student C. Upon receiving the complaint, a Shepton High School

⁹⁹ Exhibit 55- Student Statements from Student B Investigation.

¹⁰⁰ Exhibit 57 – Stay Away Agreements between Student B and Student E.

¹⁰¹ Exhibit 55 – Student Statements from Student B Investigation.

¹⁰² Exhibit 56 – Incident Report.

assistant principal investigated the allegation of bullying and determined that the conduct did not meet the “severe or pervasive” standard but implemented a stay-away arrangement between the students. A meeting was also held with the families, during which an apology was offered to Student C. In May, the director of student management conducted a formal bullying investigation into the January incidents. The administrator determined that the allegations of bullying were unsubstantiated. The assistant principal and others were addressed about their failure to initiate an investigation, as required by district policy, in January and received retraining.¹⁰³

d. Incident D

Investigators spoke with Parent D about the handling of a bullying complaint at Renner Middle School in which a student repeatedly chanted, “Free Palestine, F*** Israel” and his son, Student D, a Jewish student had told the student to stop several times.¹⁰⁴ The principal received the complaint on August 19, 2024 and sent her findings to Parent D on August 29, 2024. The principal noted in her documentation that during the investigation she placed a phone call to the parent, separated the students, and implemented a safety plan. The principal found that the incident did not meet the definition of “bullying” under policy, but she increased supervision in the area that the incident occurred and would provide “learning pieces to increase a conscientious and empathetic environment.”¹⁰⁵

4. Accommodating Religious Holidays

The agency received two complaints regarding district activities scheduled on Jewish holy days. In the first instance, a complainant reported that three Shepton High School teachers scheduled classroom tests on Rosh Hashanah in 2024, despite the date appearing on the district’s

¹⁰³ Exhibit 58 – Student C Grievance File.

¹⁰⁴ Exhibit 59 – SID Interview, Parent D, 14:22-15:16.

¹⁰⁵ Exhibit 60 – Renner MS Email to Parent D and Investigation Closure Letter, August 2024.

calendar of religious holidays in which teachers are instructed not to administer tests.¹⁰⁶ Superintendent Williams intervened upon receiving the complaint and told the complainant that the teachers would be directed to follow district policy and reschedule the tests.¹⁰⁷ The second complaint involved a school choir concert that was scheduled on Yom Kippur. The complainant noted that the district’s guidelines state that teachers are to minimize religious observance conflicts when scheduling events. The complainant acknowledged that after notifying the teacher, the teacher changed the date of the concert.¹⁰⁸

V. Analysis

The agency received multiple complaints regarding allegations of antisemitism within Plano ISD, including reports related to curriculum, classroom discussions, student walkouts and attire, attendance, bullying and harassment, and accommodating religious holidays. While certain subject areas are governed directly by provisions of the Texas Education Code, other matters fall under the purview of local district policy. Accordingly, the agency evaluated the allegations to determine whether there is systemic noncompliance with federal or state law within the district, and whether such noncompliance would establish that the board of trustees has failed to “oversee the management of the district” in violation of Tex. Educ. Code § 11.051. The agency finds that the allegation regarding a violation of Tex. Educ. Code § 11.051 by the Plano ISD board of trustees is unsubstantiated.

¹⁰⁶ Exhibit 16 – Memo from Parent Regarding Antisemitism Incidents at Plano ISD.

¹⁰⁷ Exhibit 61 – Parent Email Regarding Scheduling Tests, October 2, 2024.

¹⁰⁸ Exhibit 13 – TEA Complaint 2025-08-0435.

1. Curriculum and Classroom Discussions

Tex. Educ. Code § 28.002 requires that a school district’s curriculum meets the Texas Essential Knowledge and Skills (TEKS) identified in rule by SBOE.¹⁰⁹ In addition, Tex. Educ. Code § 28.0022 states that a teacher may not be “compelled to discuss widely debated and currently controversial issue of public policy or social affairs” and a teacher that chooses to discuss such topics “shall explore that topic objectively and in a manner free from bias.” The agency finds that there is no systemic failure by the district to comply with curriculum requirements under the Texas Education Code.

Plano ISD has an established process for the selection of instructional materials, as set forth by Policy EFA (Local).¹¹⁰ This process requires that materials be identified in accordance with administrative regulations and provides an opportunity for staff, parents, and community members to recommend instructional materials for selection. The policy also provides a process for individuals to challenge selected material.¹¹¹ At the campus level, teachers may select supplemental instructional materials provided that they adhere to the district’s established process, including the required use of the materials selection rubric. If the supplemental material only partially satisfies the criteria set forth in the rubric, the campus principal is required to document their approval prior to the material’s use.¹¹² Teachers receive curriculum training at the beginning of each school year, with additional training provided throughout the year as necessary.¹¹³

Notwithstanding the district’s development and implementation of applicable policies and procedures, the evidence demonstrates that several teachers from different campuses presented

¹⁰⁹ 19 Tex. Admin. Code Chs. 110-128.

¹¹⁰ Exhibit 19 – Plano ISD Board Policy EFA (Local) (2022-24, 2024-26, 2026-Present).

¹¹¹ Exhibit 19 – Plano ISD Board Policy EFA (Local) (2022-24, 2024-26, 2026-Present).

¹¹² Exhibit 20 – Plano ISD Materials Selection Rubric.

¹¹³ Exhibit 17 – SID Interview, Lisa Wilson, 7:13-7:40; Exhibit 21 – SID Interview, Eric Haggard, 2:26-2:50.

instructional materials that inaccurately depicted historical events related to Israel. The agency was able to investigate four curriculum-related incidents reported by complainants and identified local policy and procedure violations in three cases.¹¹⁴ In these cases, campus and/or district administrators took corrective action, which included reevaluating instructional materials, removing materials deemed inappropriate, and/or counseling or disciplining staff members for failure to comply with district procedures governing curriculum selection. In the fourth case, district and campus staff reviewed a novel (“Refugee” by Alan Gratz) that was assigned for in-class reading and determined that the book itself was not antisemitic.¹¹⁵

Three additional incidents related to curriculum or controversial topics in the classroom were identified and referenced in this report. According to the complainants, two of these incidents were addressed by the campus and no further information was provided.¹¹⁶ The third incident involved a teacher stating that there was no “documented proof” of the Jewish exodus from Egypt. This incident was never reported to campus or district administrators, and investigators could not reach the complainant to evaluate the allegation.¹¹⁷

Despite instances of teachers in several different schools failing to follow district policy and procedures regarding the selection of curriculum, these individual violations, which investigators determined were addressed by campus or district administrators, do not establish a systemic failure by the district to comply with curriculum requirements under the Texas Education Code.

¹¹⁴ See supra notes 39-42, 43-44, 47-53 and accompanying text.

¹¹⁵ See supra notes 55-56 and accompanying text.

¹¹⁶ See supra notes 45-46 and 57-58 and accompanying text.

¹¹⁷ See supra note 54 and accompanying text.

2. Student Conduct

Tex. Educ. Code § 37.001 requires school districts to adopt a student code of conduct (SCOC). Pursuant to Tex. Educ. Code § 11.201(d)(12), the superintendent—who is subject to oversight by the board of trustees—is required to ensure enforcement of the SCOC and to adopt other student disciplinary rules and procedures as necessary. Tex. Educ. Code § 37.0832 also requires school districts to adopt a bullying policy, “including any necessary procedures.” Tex. Educ. Code § 25.087 outlines state-required excused absences and further provides that absences may be excused “for temporary absence resulting from any cause acceptable to the teacher, principal, or superintendent of the school....” The agency finds that the district is in compliance with applicable statutory and administrative requirements related to its student code of conduct, bullying policies, and attendance procedures.

Plano ISD has adopted a SCOC, which incorporates the student dress code, pursuant to Tex. Educ. Code § 37.001 and bullying policies, FFI (Legal) and FFI (Local), pursuant to Tex. Educ. Code § 37.0832.¹¹⁸ These policies comply with statutory requirements, including procedures for reporting alleged bullying, notifying parents, and conducting investigations. The evidence further indicates that the superintendent is enforcing these policies as required by Tex. Educ. Code § 11.201(d)(12), utilizing the district’s established processes and procedures.

The agency’s review shows that district administrators, in the exercise of their management authority, has an established walkout protocol for principals, which expressly prohibits staff from supporting or participating in student walkouts and requires that any such activity not materially or substantially interfere with school operations or the rights of others.¹¹⁹ Investigators determined

¹¹⁸ Exhibit 14 - Plano ISD Student Code of Conduct (2023-24, 2024-25, 2025-26).

¹¹⁹ Exhibit 34 – Plano ISD Walkout Protocol.

that the principals at McMillen and Plano East complied with this protocol and followed up by issuing communications to all campus families and addressing individual concerns. At McMillen, upon receiving concerns regarding alleged antisemitic chants, the principal met with the students involved and counseled them on the effect their conduct has on others. Because the walkout at Plano East overlapped with instructional time, students were marked “absent on campus” when they failed to arrive on time to class.¹²⁰

The agency also reviewed allegations asserting that members of the Muslim Student Association (MSA) at Jasper High School gathered on the anniversary of the Hamas attack on Israel and wore keffiyehs and Palestine-themed shirts. The Jasper High School principal, Brooks Baca, investigated the matter at the time, which included interviewing the MSA faculty sponsor and members of the club and reviewing MSA communications through the online platform. Baca did not find evidence that an MSA gathering occurred or that students coordinated clothing.¹²¹ Agency investigators received no further information that would contradict Baca’s findings.

The agency received several other complaints alleging the district was permitting students to wear antisemitic student attire. The district’s student dress code, adopted as part of the SCOC, outlines permissible clothing standards. Investigators determined that campus administrators complied with district policy and applied First Amendment guidelines when addressing concerns related to student attire. In response to these complaints and to better clarify appropriate attire, the district revised the student dress code and staff handbook to explicitly identify allowable clothing.¹²²

¹²⁰ See supra notes 59-67.

¹²¹ Exhibit 37 – SID Interview, Brooks Baca. 6:10-10:46.

¹²² See Exhibit 62 – Superintendent Williams’s Timeline of Actions Addressing Antisemitism (2023-25); Exhibit 14 – Plano ISD Student Code of Conduct (2023-24, 2024-25, 2025-2026).

The agency received information from complainants about the alleged mishandling of two individual incidents involving antisemitic bullying at Plano West High School and incidents at two other schools in the district. Based on documentation and interviews, investigators determined that district administrators in Incidents A, B, and D recorded complaints, initiated investigations, and provided notice to the involved families regarding the allegations in compliance with statute and district policy. During the pendency of these investigations, administrators adhered to Policy FFI by implementing interim measures, including stay-away agreements and scheduling changes. Upon concluding the investigations, the district issued findings to parents, imposed additional long-term stay-away agreements, counseled students, and, in one case (Incident B), imposed disciplinary action for harassment based on the victim's religion. Additionally, investigation closure letters provided information on filing a grievance with the district and initiating a complaint with the Office for Civil Rights.¹²³

Incident C was not initially handled in accordance with district policy by the assistant principal who received the bullying complaint. Although she conducted a preliminary review and implemented a stay-away arrangement, she did not follow the required procedural steps. A central office administrator later corrected the oversight by completing a formal bullying investigation in compliance with Policy FFI, ultimately determining that the allegation was unsubstantiated. The assistant principal and others were counseled on their failure to follow Policy FFI and were retrained.¹²⁴

Investigators also determined that, although parental notification of investigative outcomes occurred, the district failed to consistently document investigative steps and follow-up actions.

¹²³ See supra notes 74-103 and 105-106 and accompanying text.

¹²⁴ See supra note 104 and accompanying text.

This lack of documentation, in part,¹²⁵ resulted in parental communication that did not contain sufficient detail. The district has since undertaken corrective measures, including staff training, to address these deficiencies.¹²⁶

Based on the foregoing, the agency concludes that the district is in compliance with applicable statutory and administrative requirements related to its student code of conduct, harassment and bullying policies, and attendance procedures related to walkouts during instructional time.

3. Accommodating Religious Holidays

The agency received two complaints regarding the district's accommodation of religious holidays. The Texas Education Code addresses the observance of religious holy days in the context of excused absences under Tex. Educ. Code § 25.087, and complainants stated that the district maintains its own guidelines regarding testing and school activities on such days. In both complaints, the complainants acknowledged that the district promptly addressed the concerns: in one instance, district administrators directed three Shepton High School teachers to move classroom tests that had been scheduled on Rosh Hashanah, and in the other, a teacher rescheduled a choir concert so to avoid a conflict with Yom Kippur. Furthermore, there was no allegation that Jewish holidays were treated differently than other religious holidays.¹²⁷

¹²⁵ The district's former chief of staff acknowledged that FERPA limitations prevented district administrators from sharing information on student discipline with parents, which contributed to parent frustration. See Exhibit 63 – SID Memo of Interview, Danny Stockton, September 11, 2025.

¹²⁶ Exhibit 62 – Superintendent Williams's Timeline of Actions Addressing Antisemitism (2023 – 2025).

¹²⁷ See supra notes 107-109 and accompanying text.

Based on the corrective actions taken and the absence of evidence indicating noncompliance with state law, the agency does not find a violation of the Texas Education Code regarding religious holidays.

4. Title VI Discrimination

Title VI of the Civil Rights Act of 1964, provides that “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”¹²⁸ As discussed earlier in this report, the U.S. Supreme Court has articulated frameworks for intentional discrimination and student-on-student harassment. After reviewing the evidence under both frameworks, the agency concludes that the district did not engage in intentional discrimination nor did the district act with deliberate indifference to known harassment.

To determine whether Plano ISD intentionally discriminated against Jewish students, the agency applies the analytical framework set forth in *Village of Arlington Heights*. Under that framework, intentional discrimination may be established through direct or circumstantial evidence, and the inquiry considers several non-exhaustive factors: the historical background of the challenged decision; the sequence of events leading to the decision; departures from normal procedures or substantive conclusions, and the relevant administrative history. In this matter, the record contains no evidence indicating that the district’s policies or practices were adopted or implemented with the intent to treat Jewish students differently or to disadvantage them on the basis of race, color or national origin.

¹²⁸

42 U.S.C § 2000d.

A district's potential liability for student-on-student harassment is evaluated under the legal standard established in *Davis*. Under *Davis*, a school district may be held liable only when it has actual knowledge of harassment that is so severe, pervasive, and objectively offensive that it effectively denies the victim access to an educational opportunity or benefit, and when the district's response is deliberately indifferent—that is, when it makes a deliberate choice to “remain idle” in the face of known harassment. The district's response must be “clearly unreasonable in light of the known circumstances” to satisfy the standard.

Applying this framework, the agency finds that the district did not act with deliberate indifference by remaining “idle” in the student-on-student harassment cases reviewed by the agency. The evidence examined by investigators shows that district administrators followed its established policies and protocols, including taking reports of bullying and harassment, notifying the parents of the students involved, and convening investigations. Administrators also implemented interim measures during the pendency of the investigations, such as stay-away agreements and scheduling changes. Upon concluding the investigations, district administrators issued findings to the parents of the students involved, and in the case of Incident B, imposed additional long-term stay-away agreements, counseled students, and imposed disciplinary action for harassment based on the victim's religion. In Incident A, after making a determination that the alleged behaviors did not create an intimidating educational environment or infringe on the rights of the victim at school, the administrator provided the victim's parent with information on filing a grievance with the district and initiating a complaint with the Office for Civil Rights. In Incident C, district administrators ultimately corrected the initial decision not to conduct an investigation. After identifying the oversight, they completed a full investigation and followed district procedures required by policy. These actions do not constitute a clearly unreasonable response under *Davis*.

In addition to the district’s responses to these individual cases, since the Hamas attack on Israel in October 2023, Plano ISD has undertaken a series of measures to address concerns related to antisemitism, including updating instructional and discussion materials; revising the student code of conduct and employee handbook; providing extensive staff and administrator training, including handling complaints of bullying and harassment and Title VI; engaging in ongoing meetings with Jewish community leaders and families; implementing curriculum reviews; prohibiting antisemitic or divisive clothing; and establishing taskforces focused on student safety and civility.¹²⁹

The evidence does not support a finding of intentional discrimination by the district toward Jewish students or deliberate indifference to student-on-student harassment directed at Jewish students. Accordingly, the agency concludes that Plano ISD did not violate Title VI.

VI. Summary

The allegations that Plano ISD engaged in systemic noncompliance with statutory and administrative requirements related to curriculum, classroom discussions, student walkouts and attire, attendance, bullying and harassment, and accommodating religious holidays—including under Title VI of the Civil Rights Act of 1964 and statutes and policies outlined in Tex. Educ. Code §§ 28.002, 28.0022, 37.001, 25.087, and 37.0832, respectively, and 19 Tex. Admin. Code Chapters 110-128—are unsubstantiated. Because the record does not support a finding of Title VI violations or systemic noncompliance with state statutory and administrative requirements, the agency likewise concludes that the allegation that the Plano ISD board of trustees failed to oversee

¹²⁹ Exhibit 62 – Superintendent Williams’s Timeline of Actions Addressing Antisemitism (2023–2025). See also Exhibit 3 – Plano ISD Response to Allegations and Request for Documents, which outlines measures taken by the district since 2023.

management of the district in violation of Tex. Educ. Code § 11.051 is unsubstantiated. Accordingly, the agency has concluded its review and this investigation is now closed.