



Methods of Administration Program Monitoring Tool

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Methods of Administration (MOA) Monitoring Tool

Overview

The purpose of the Methods of Administration (MOA) program is to ensure that all students, regardless of race, color, national origin, sex, or disability, have equal access to high-quality career and technical education programs. Through its Methods of Administration authority, the Office of Civil Rights (OCR) at the United States Department of Education oversees the civil rights compliance programs of state agencies that administer career and technical education.

In the District of Columbia, the Office of the State Superintendent of Education (OSSE) coordinates the MOA program as stipulated in the *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* of the Title VI regulation, the Section 504 regulation, and the Title IX regulation. These responsibilities include: conducting targeted compliance reviews of selected secondary and postsecondary schools that provide career and technical education; securing corrective action when civil rights violations are found; and periodically reporting civil rights activities and findings to OCR.

This MOA Monitoring Tool for the District of Columbia provides operational guidance and a tool for schools to fully understand practical application of the framework, processes, and procedures associated with the administration of OCR requirements for local education agencies operating within the District of Columbia.



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20.1: Civil Rights Assurances

Description of Requirements

LEA has a statement of assurance (signed by the Superintendent and/or Board Chair) for Title VI, Title IX and Section 504.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (The Guidelines)

Americans with Disabilities Act Title II

Title VI of the Civil Rights Acts of 1964 [34 C.F.R., 100.4(a) thru (d)]

Title IX of the Education Amendments of 1972 [34 C.F.R., 106.4]

Section 504 of the Rehabilitation Act of 1973 [34 C.F.R. 104.5]

Acceptable Evidence to Meet Requirements

- Provide signed and dated current copy of assurance for Title VI, Title IX, Section 504 or a combined assurance document
- Provide a copy of Board minutes authorizing the assurance



20.2: Administrative

Description of Requirements

In order to comply with United States Department of Education guideline requirements for Career and Technical Education (CTE) programs, LEAs must have in place basic procedures regarding federal statutes and implementing departmental regulations: Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, as well as Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap.

There are four basic administrative requirements:

1. Annual public notice of nondiscrimination. Prior to the beginning of the year, the LEA must advise students, parents, employees and general public that all career and technical opportunities will be offered regardless of race, color, national origin, sex or disability. The notice must include a brief summary of program offerings and admission criteria and the name, office address, and phone number of persons designated to coordinate compliance under Title IX and Section 504. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must take steps to assure that the lack of English language skills will not be a barrier to admission and participation in CTE programs.
2. Continuous notification of nondiscrimination. The LEA must take continuing steps to notify parents, applicants, employees (including those with impaired vision or hearing), unions or professional organizations that it does not discriminate on the basis of race, color, national origin, sex, or disability.
3. LEA has designated at least one employee for each of the following areas to coordinate and monitor the LEA's compliance with its responsibilities under state nondiscrimination laws, Title IX, Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act. LEA has and uses an approved statement notifying the public who they should contact for special accommodations by title, phone, and address.
4. LEA shall adopt and publish a grievance procedure that allows students and parents an avenue for dealing with alleged discrimination based on sex or disability in a prompt and equitable resolution.

Guiding Statutory Citations

Requirement 1

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs: IV-O

Americans with Disabilities Act Title II: 28 CFR 35.107(a)

Section 504 of the Rehabilitation Act of 1973: 34 CFR 104.7(b)

Title IX of the Education Amendments of 1972: 34 CFR 106.8

Requirement 2

Title IX of the Education Amendments of 1972; 34 CFR 106.9

Section 504 of the Rehabilitation Act of 1973: 34 CFR 104.8

Americans with Disabilities Act Title II: 28 CFR 35.107(a)

Department of Education Office of Civil Rights: <https://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>

Requirement 3

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs IV-O

Americans with Disabilities Act Title II: (28 CFR Part 35.107)

Title IX of the Education Amendments of 1972: (34 CFR Part 106.8(a))

Section 504 of the Rehabilitation Act of 1973: (34 CFR Part 104.7(a))

Americans with Disabilities Act Title II, Subpart E, Communications, 35.160 General (b)(1)(a)

Requirement 4

Americans with Disabilities Act Title II: 28 CFR 35.107(b)

Section 504 of the Rehabilitation Act of 1973: 34 CFR 104.7(b)

Title IX of the Education Amendments of 1972: 34 CFR 106.8(b)

Department of Education Office of Civil Rights: <https://www2.ed.gov/about/offices/list/ocr/grievance.html>

Acceptable Evidence to Meet Requirements

- Annual public announcement disseminated to the general public by the LEA concerning CTE programs/ course offerings and the provision of these programs and courses in a nondiscriminatory manner. Annual notice lists coordinators of Section 504/ADA and Title IX with their name/title, address, and phone number.
- If applicable, notice disseminated in the language of any national origin minority community intended to reach the general public who are English learners (EL).
- Provide continuous nondiscrimination statement evidence of what is posted in schools and placed in major publications, which may include:
 1. Student handbooks from each high school with the LEAs nondiscrimination statement highlighted
 2. Employee handbooks with the LEAs nondiscrimination statement/policies/procedures highlighted
 3. Parent handbook with LEAs nondiscrimination statement highlighted
 4. Course catalogs
 5. Job announcements
 6. Job applications
 7. Brochures
 8. School newsletters

9. Posters advertising various CTE programs
- Provide the name and title for the Title IX Officer who has been assigned, is aware of their duties, and responsibilities and has the training necessary to carry out their responsibilities. Evidence may include:
 1. Job descriptions
 2. Proof of most recent training attended
 3. Professional development training, including agenda, conducted for staff and employees
 4. Investigations
 5. Monitoring student climate surveys
 6. Websites
 - Provide the name and title for the Section 504/ADA Coordinator who has been assigned, is aware of their duties, and responsibilities and has the training necessary to carry out their responsibilities. Evidence may include:
 1. Job descriptions
 2. Proof of most recent training attended
 3. Professional development training, including agenda, conducted for staff and employees
 4. Investigations
 5. Websites
 - Provide the name and title for the Title II Coordinator who has been assigned, is aware of their duties, and responsibilities and has the training necessary to carry out their responsibilities. Evidence may include:
 1. Job descriptions
 2. Proof of most recent training attended
 3. Professional development or training, including agenda, conducted for staff and employees
 4. Investigations
 5. Websites
 - Provide the name and title for the Harassment, Intimidation, and Bullying Compliance Officer who has been assigned, is aware of their duties, and responsibilities and has the training necessary to carry out their responsibilities. Evidence may include:
 1. Job descriptions
 2. Proof of most recent training attended
 3. Professional development or training, including agenda, conducted for staff and employees
 4. Investigations
 5. Websites
 - Provide public notification and location of services, activities, and location of facilities that are accessible to and useable by individuals with disabilities. Evidence may include:
 1. Public notification statement of who to contact for special needs (by name, title, address, phone number) and advance notice deadline
 2. Copy of an event notice with the special needs statement

- Provide copies of the student and employee grievance procedures specific to Title IX (discrimination based on sex)
- Provide copies of the student and employee grievance procedures specific to Section 504 and Title II (based on disability)
- Provide copies of the student and employee grievance procedures specific to Harassment, Intimidation, and Bullying



20.3: Recruitment

Description of Requirements

- LEAs must conduct their recruitment activities in a manner that does not exclude or limit opportunities on the basis of race, color, national origin, sex or disability.
- Recruitment material descriptions of career and occupational opportunities are not to be limited on the basis of race, color, national origin, sex or disability. To the extent possible, recruiting teams should represent persons of different races, national origins, sexes and disabilities.
- LEAs must ensure that counselors can effectively communicate with students with disabilities and students with limited English proficiency.
- LEAs may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration.
- If a LEAs service area contains a community with persons of limited English proficiency, information must be available and distributed to that community in its language.

Guiding Statutory Citations

Title IX of the Education Amendments of 1972: (34 CFR § 106.23 (a)(b))

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs: V. A., C., E.

Acceptable Evidence to Meet Requirements

- Provide all potential students with access to information and efforts made to reach underrepresented groups. Evidence may include:
 1. Recruitment plans
 2. List of recruitment activities and sites
 3. Description of recruitment activities
 4. Schedule of recruitment activities
 5. Selection and admissions criteria for CTE programs/courses
- Provide descriptions of career opportunities that are bias-free and free from stereotyping. Evidence may include:
 1. Recruitment brochures and marketing materials- English and non-English versions
 2. Course syllabi and course catalog
 3. Policies/procedures for CTE programs and courses that address needs of EL students

- The LEA, where possible, should have persons of differing races, genders, and disability to be on recruitment teams. Evidence may include:
 1. Staff demographics by program
 2. Recruitment team demographics by program
- Process in place to identify and communicate with limited English proficiency communities. Efforts are made to communicate in a commonly understood language. Evidence may include:
 1. Verification of limited English proficient community
 2. Samples of materials in other languages
- Promotional materials and/or media presentations that show persons of varying races, male and female, persons with disabilities, and different national origins. Evidence may include:
 1. Brochures
 2. Pamphlets
 3. Flyers
 4. Posters
 5. Presentations
 6. Videos



20.4: Admissions

Description of Requirements

- LEA may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminate on the basis of race, color, national origin, sex or disability.
- LEA may not restrict admission to CTE programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from CTE to the same extent as students whose primary language is English.
- LEA must not deny access to CTE and academic programs or courses to students with a disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for non-disabled persons.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs: IV-A; L; N
Section 504 of the Rehabilitation Act of 1973: 34 CFR 104.10; 34 CFR 104.43(c)

Acceptable Evidence to Meet Requirements

- Eligibility and admission criteria for CTE. Evidence may include:
 1. Descriptions of the admissions process
 2. Counseling materials
 3. CTE schedule of courses
 4. CTE student data
- Procedure for English learners (EL) identification, assessment, and placement. Evidence may include:
 1. EL enrollment in CTE is proportional to EL enrollment in the service area
 2. EL enrollment in specific CTE programs is proportional to EL enrollment in CTE overall
- Provide steps taken to increase EL and students with disabilities participation in programs where they traditionally have been underrepresented. Evidence may include:
 1. Documentation of counseling
 2. Counseling materials
 3. Placement and follow-up data



20.5: Student Financial Assistance

Description of Requirements

- Financial assistance is available to all students regardless of sex, race, color, national origin or disability. LEAs shall not limit honors, awards and scholarships to a group on the basis of race, color, national origin, sex or disability unless such targeting is done to provide opportunities to members of a group that has traditionally not been represented.
- Outside agencies that provide awards are to be notified of the LEA's nondiscrimination policy. An LEA may administer or assist in the administration of scholarships or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, and similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarship on the basis of sex, race, national origin or disability.
- Because financial aid is often the stumbling block for those historically underrepresented in postsecondary education, secondary schools should assist all students preparing for postsecondary experiences, including disadvantaged students, to become aware of this requirement.
- If an LEA's service area contains a community of national origin minority persons with limited English language skills, material and information
- used to notify students of financial aid opportunities must be disseminated to that community in its language.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs: VI-B.

Title VI of the Civil Rights Acts of 1964: (34 CFR §§ 100.3 (a)(b))

Title IX of the Education Amendments of 1972: (34 CFR § 106.37)

Section 504 of the Rehabilitation Act of 1973: (34 CFR § 104.4 (a)(b))

Acceptable Evidence to Meet Requirements

- Provide scholarship and financial materials and publications
- LEA has a process in place to identify and communicate with language minority communities. Efforts are made to communicate in a commonly understood language. Evidence to include:
 1. Verification of limited English proficient communities
 2. Samples of materials in other languages



20.6: Guidance and Counseling

Description of Requirements

- Counselors may not include steering of students toward particular courses or programs that are traditional for the student’s race, color, national origin, English language proficiency, sex or disability. Counselors may not counsel students with disabilities toward more restrictive career objectives than non-disabled students with similar abilities and interests.
- Services and materials related to career counseling and recruitment must be free of discrimination and stereotyping in language, content and graphic illustration.
- LEAs must ensure that counselors can effectively communicate with students with limited English proficiency and with students with sensory impairments.
- If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs: V. A., B., D.

Title IX of the Education Amendments of 1972: 34 CFR § 106.36

Section 504 of the Rehabilitation Act of 1973: 34 CFR §§ 104.4 (a)(b), 104.37 (b))

Acceptable Evidence to Meet Requirements

- Provide copy of the written guidance and counseling policy, plan and procedure to ensure nondiscrimination. Evidence may include:
 1. Counseling services and written plan for students with disabilities, EL students, and for provision of services for individuals with hearing impairments
- Provide examples of how the students’ needs are being met. Evidence may include:
 1. Pre-enrollment counseling to students with disabilities
 2. Enrollment forms/registration packets
 3. Tests administered for selecting students for placement in CTE programs and courses
 4. career materials in other languages and formats
- Provide enrollment demographics by CTE class/program
- Provide description of any efforts made to correct disproportionate program enrollment by gender, minority or disabled status



20.7: Services for Students with Disabilities

Description of Requirements

- A qualified person with a disability may not, on the basis of disability, be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity.
- LEA may not restrict access for students with disabilities to schools, programs, services and activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.
- LEAs must provide a free, appropriate public education (FAPE) to each qualified student with disabilities. LEA must have a system in place for the identification, evaluation and educational placement of students with disabilities.
- Placement decisions must be made by a group of persons, including persons knowledgeable about the child, the meaning of the evaluation, data, and the placement options. LEA must provide procedural safeguards through which parents or guardians may obtain an impartial review of the evaluation and placement actions.
- Section 504 of the Rehabilitation Act of 1973, ADA, and Title II are based upon the premise that students with disabilities will be integrated with their non-disabled peers to the maximum extent possible.
- Students with disabilities are placed in a CTE program only when the 504 FAPE requirements for evaluation, placement, and procedural safeguards have been satisfied.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (The Guidelines): IV. N.; VI. A.

Americans with Disabilities Act Title II: (28 CFR 35.130)

Section 504 of the Rehabilitation Act of 1973: 34 CFR §§ 104.4 (a), 104.33-36

Acceptable Evidence to Meet Requirements

- Provide policies and procedures ensuring access for students with disabilities to programs, services, and activities. Evidence may include:
 1. Transportation policy for students with disabilities
 2. Policy for providing aids and services
 3. Policy governing accommodations
 4. FAPE policies and procedures
 5. Written procedures for evaluation and placement of students with disabilities

- Provide public notice that all services, activities, and facilities are accessible for individuals with disabilities
- Provide examples of how students' needs are being met. Evidence may include:
 1. Photographic evidence of adapted equipment
 2. List of materials and resources available to students with sensory impairments
 3. Description or list of the materials and persons relied upon in the evaluation and placement process
 4. List of persons with knowledge of CTE programs who participate in FAPE placement decisions for CTE programs
 5. Bell schedule
- Provide description of the system of procedural safeguards
- Provide two Section 504 plans and two IEPs, and similar records of students with disabilities placed in a CTE program.



20.8: Accessibility

Description of Requirements

LEAs may not exclude students with disabilities from enjoying the benefits of its program or service due to inaccessibility of facilities, according to Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990. All agencies are responsible for compliance with Section 504 and Title II. Applicable accessibility standards are determined by the date the facility was constructed or last altered. In general, in the case of a facility's alteration, only the altered portion is affected. The standards are as follows (ANSI, UFAS, 1991 ADA Standards, and 2010 ADA Standards):

Facilities constructed or alteration initiated before June 4, 1977

Programs or activities offered in existing facilities must, when viewed in their entirety, be readily accessible to persons with disabilities (*see Section 504 of the Rehabilitation Act of 1973: 34 CFR §104.22 and 28 CFR § 35.150*).

Facilities constructed or alteration initiated between June 4, 1977 and January 17, 1991

Facilities follow American National Standards Institute, Inc. (ANSI) A117.1-1961 (R1971). (*Also see Section 504 of the Rehabilitation Act of 1973 (34 CFR § 104.23)*).

Facilities constructed or alteration initiated between January 18, 1991 and January 27, 1992

Facilities follow the Uniform Federal Accessibility Standards (UFAS) Appendix A to 41 CFR subparts 101-19.6. (*Also see Section 504 of the Rehabilitation Act of 1973 (34 CFR § 104.23)*).

Facilities constructed or alteration initiated between January 27, 1992 and March 15, 2012

Note: Only one of the following standards may be used for each building or alteration

- The UFAS, noted in Appendix A to 41 CFR subpart 101-19.6.
- The 1991 ADA Standards (with or without the elevator exemption) or
- The 2010 ADA Standards may be used.

Facilities constructed or alteration initiated on or after March 15, 2012

- The 2010 ADA Standards

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (The Guidelines): IV. N.

Americans with Disabilities Act Title II: 28 CFR §§ 35.133, 35.149-151

Section 504 of the Rehabilitation Act of 1973: 34 CFR § 104.21-23

Acceptable Evidence to Meet Requirements

Note: Provide the following facility information:

- Date(s) of original construction, and area(s) of subsequent renovation(s)/ alteration(s)
- Date ramp(s) added/installed and location
- Date elevator(s)/lift(s) added/installed and location
- Date of the last resurfacing and/or restriping of each of the parking lots
- Total parking spaces and number of accessible spaces in each lot, to include the width of each accessible parking space and signage heights (from ground to the bottom of the sign)
- Seating capacity of the auditorium, with number and location of accessible seats
- Seating capacity of the gymnasium, with number and location of accessible seats
- Number of assistive listening devices available in auditorium and gymnasium
- Site/campus map(s) and floor plan(s) for facilities must be identified by:
 1. Buildings with lines separating original construction or other renovations or alterations; label with dates of construction, renovation and/or alternations
 2. Paths of travel (includes primary entrances to the building or facility; specific areas, restrooms, commons, auditorium, gymnasium, locker rooms, drinking fountains, library, service areas, signage, etc.)
 3. Parking lot with total number of spaces as well as number of accessible spaces; include date of last resurfacing and/or restriping
 4. Ramp(s), elevator(s)/lift(s) added/installed, include date of installation, and location
 5. CTE classrooms, laboratories, greenhouses, barns, and indicate CTE course(s) taught (i.e. Automotive Technology, Aerospace, Culinary Arts, ASL, Web and Digital Communication, Horticulture and Science, Business and Marketing, Finance, Visual Arts, Health and Medical Services, etc.)



20.9: Comparable Facilities

Description of Requirements

- Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities.
- Facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex.
- Any separate facilities for male, female, or disabled students should be located in similar proximity to the associated classrooms, shops or laboratories.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (The Guidelines): VI. A., D.

Title IX of the Education Amendments of 1972: 34 CFR § 106.33

Section 504 of the Rehabilitation Act of 1973: 34 CFR § 104.4 (b)(ii); 34 CFR § 104.34 (c)

Acceptable Evidence to Meet Requirements

- Provide a comparison of programs and services offered to both students with disabilities and students without disabilities.
- Locker rooms, changing rooms, showers, restrooms, coaches' rooms, and classrooms offered to both students with disabilities and students without disabilities for students of the other sex.
- Provide facilities maps marked to indicate access points to locker rooms, changing areas, showers, restrooms, and classrooms.



20.10: Work Study, Cooperative Programs, Job Placement, and Apprenticeship Training

Description of Requirements

- An LEA not only has the responsibility to provide its services in a nondiscriminatory manner; it also has the responsibility not to foster discrimination by businesses that provide employment, workplace learning sites or apprenticeship training programs. To be a partner in discrimination is illegal.
- Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, national origin or disability.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (The Guidelines): VII. A., B.

Title IX of the Education Amendments of 1972: 34 CFR § 106.38(a)

Acceptable Evidence to Meet Requirements

- Provide enrollment data by race, national origin, sex and disability in career related learning experiences, internships, and job placement programs
- Provide placement policies and criteria for placement (to include EL students and student with disabilities)
- Provide student employment notices
- Provide copies of training agreements with employers that include statements of nondiscrimination and employer assurances
- Provide workplace assignments, hours of work, salary, job assignments, and evaluations



20.11: Employment

Description of Requirements

LEAs are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

The LEA must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex or disability. The LEA should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin sex or disability.

LEAs must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions to the positions and make reasonable accommodations for the physical or mental limitations of disabled, qualified applicants, unless it can be demonstrated that such accommodations would impose undue hardship.

Guiding Statutory Citations

Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (The Guidelines): VIII. A.-F.

Title IX of the Education Amendments of 1972: 34 CFR §§ 106.51-61

Section 504 of the Rehabilitation Act of 1973: 34 CFR § 104.11-14

Acceptable Evidence to Meet Requirements

- Provide copies of employment practice documents. Evidence may include:
 1. Hiring, retention, and promotion policies and procedures
 2. Recruitment policies and procedures
 3. Advancement policies and procedures
 4. Screening committee policies and procedures
 5. Rating systems/rubric
 6. Provide compensation system that evaluates jobs and placement in appropriate salary ranges according to working conditions and levels of employment responsibility

7. Provide copy of affirmative or equal employment opportunity plan adopted by the Board
8. Provide job announcements
9. Provide blank employment applications
10. Provide job descriptions for classified staff and certificated staff
11. Provide HR website link and other related recruitment documents
12. Provide faculty assignment report by race, national origin, sex, primary language other than English, and disability



Desk Audit Results

Compliance Section	Evidence	Compliance Determination
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