

# Career and Technical Education Civil Rights On-site Review Checklist

## Federal Compliance Requirements

U.S. Department of Education laws and regulations implementing:

- Title VI of the Civil Rights Act of 1964 (Title VI), 34 CFR Part 100
- Title IX of the Education Amendments of 1972 (Title IX), 34 CFR Part 106
- Section 504 of the Rehabilitation Act of 1973 (Section 504), 34 CFR Part 104
- Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services On The Basis Of Race, Color, And National Origin, Sex And Handicap (Guidelines), 34 CFR Part 100 Appendix B

U.S. Department of Justice laws and regulations implementing:

- Title II of the Americans with Disabilities Act of 1990 (ADA), 28 CFR Part 35

1. ADMINISTRATIVE																																		
<p>Administrative Issues</p> <p>Recipients need to have certain base requirements in place to comply with the OCR Guidelines, Title VI, Title IX, and Section 504. These basic procedures include an annual public notice, continuous notification, designation of a person(s) to coordinate activities under Title IX and Section 504, and a grievance procedure that will allow students an avenue for dealing with discrimination from faculty, fellow students, and administrators. To verify this, it will be necessary to review many documents and to interview administrators, Title IX and Section 504 coordinators, faculty, and students.</p>																																		
Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)																												
			Yes	No	Not Sure																													
A. Annual Public Notification																																		
<p>1. Prior to the beginning of each school year, recipients must advise students, parents, employees, and general public that all vocational opportunities will be offered regardless of race, color, national origin, sex, or disability.</p>	<p>Recipient issues annual public notice of nondiscrimination.</p> <p>The notice also is disseminated in any language other than English as needed.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Is the notice in:</td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> <tr> <td style="padding: 2px;">Local newspapers?</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding: 2px;">Institution newspapers?</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding: 2px;">Other publications?</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding: 2px;">Does notice have brief description of program offerings and admission criteria?</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding: 2px;">Do publications with notice reach students, parents, employees, and applicants?</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding: 2px;">Describe method used.</td> <td></td> <td></td> <td></td> </tr> </table>	Is the notice in:				Local newspapers?				Institution newspapers?				Other publications?				Does notice have brief description of program offerings and admission criteria?				Do publications with notice reach students, parents, employees, and applicants?				Describe method used.							<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
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Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
2. 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. <u>Title IX: 34 CFR § 106.8(b)</u> <u>Section 504: 34 CFR § 104.7(a)</u> <u>Title II: 28 CFR § 35.107(a)</u> <u>Guidelines IV-O</u>	Annual notice lists coordinators of Section 504/ADA and Title IX with their name/title, address, and phone number.	Is notice available to persons with visual impairments? Describe method used.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Does community have national origin minority students? If yes, is public notice provided in the applicable language(s) of that national origin minority?				
		How does notice get disseminated to national origin minority population(s)?				
	<b>Comments</b>					
<b>B. Continuous Nondiscrimination Notice</b>						
1. Recipient shall take continuing steps to notify participants, beneficiaries, applicants, elementary and secondary school parents, employees (including those with vision or hearing impairments), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability. <u>Title IX: 34 CFR § 106.9</u> <u>Section 504: 34 CFR § 104.8</u>	A variety of recipient publications notifies applicants, students, employees, and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability.  Recipient lists coordinators of Section 504 and Title IX with their name/title, address, and phone number in the notice of nondiscrimination.	Is nondiscrimination notice found in the following publications:				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Brochures on programs, activities				
		Student application				
		Job application				
		Catalog				
		Student handbook				
		Job announcements				
		Posters advertising various programs				
		Recruitment materials				
		Web site				
School newspaper						
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>C. Persons responsible for coordinating Title IX and Section 504/ADA</b>						
<p>1. Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504 and Title IX. <u>Section 504: 34 CFR § 104.7(A)</u> <u>Title IX: 34 CFR § 106.8</u></p> <p>2. The recipient must notify students and employees of the name, office address, and phone number of the designated employee(s). <u>Title IX: 34 CFR § 106.8</u> <u>Section 504: 34 CFR § 104.7(a)</u></p>	<p>Recipient has assigned a person(s) to coordinate Section 504/ADA and Title IX activities. This person(s) must be aware of his/her duties and responsibilities and have the training necessary to carry them out.</p> <p>Recipient lists coordinators of Section 504/ADA and Title IX with their name/title, address, and phone number in all Division publications.</p>	Catalogs				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Handbooks				
Job descriptions						
Web site						
Marketing materials						
<b>Comments</b>						
<b>D. Grievance Procedure</b>						
<p>1. A recipient shall adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability. <u>Section 504: 34 CFR § 104.7(b)</u> <u>Title IX: 34 CFR § 106.8(b)</u> <u>Title II: 28 CFR § 35.107(b)</u></p>	<p>Recipient notifies its students and employees that there is a grievance procedure for persons who feel they have been discriminated against based on sex or disability.</p> <p>The procedure(s) is readily available to students and employees and it ensures a prompt and equitable response.</p>	Describe method(s) used:				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Grievance procedures				
Student handbooks (in age appropriate language)						
Employee handbooks						
Catalogs						
Posted notices						
Discussion/presentations						
Other						
<b>Comments</b>						

2. EMPLOYMENT						
Employment Issues						
Recipients are prohibited from engaging in any employment practice which 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, under or over representation of protected groups, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.						
Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A.</b>						
<p>1. Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or disability. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion, or other discrimination against students. <u>Section 504: 34CFR § 104.11 Guidelines VIII-A</u></p> <p>2. Recipients may not make pre-employment inquiries concerning disability, marital, or parental status. <u>Title VI: 34 CFR § 100.3(c)</u> <u>Title IX: 34 CFR § 106.51, 106.57, and 106.60</u> <u>Section 504: 34 CFR § 104.13 and 104.14</u> <u>Guidelines VIII-A</u></p>	<p>Recipient's employment practices are conducted without regard to race, color, national origin, sex, or disability of applicants or employees.</p> <p>Application forms and materials are free from prohibited questions concerning disability, marital, or parental status.</p>	Employment documents including:				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Hiring policies and procedures				
		Advancement policies and procedures				
		Nondiscrimination statements				
		Employee handbooks				
		Application materials and forms				
		Screening committee policies and procedures				
		Rating systems				
		Job announcements				
		Recruitment policies				
		Policies and procedures regarding interviewing practices.				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>B.</b>						
1. The recipient must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability. <u>Guidelines VIII-B</u>	Local agency or postsecondary institution notifies its sources of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.	Employment policies				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Employee Handbook				
		Application form for employment.				
		Vacancy announcements and advertisements.				
		Recruitment letters or contacts				
		Personnel Web site and other related recruitment documents.				
	Published nondiscrimination statement in newspapers, student handbooks, other college materials.					
<b>Comments</b>						
<b>C.</b>						
1. Requires the recipient to 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. <u>Title IX:34 CFR § 106.54</u> <u>Section 504:34 CFR § 104.11</u> <u>Guidelines VIII-D</u>	Faculty salary scales and policy are based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.  Faculty assignment patterns are nondiscriminatory on the basis of race, color, national origin, sex, or disability.	Faculty salary schedules and related policies.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Faculty assignment information by race/ethnic group, sex, and staff with a disability.				
<b>Comments</b>						

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
2. Nonfaculty salary administration is based upon the conditions of employment without regard to race, color, national origin, sex, or disability. Title IX: 34 CFR § 106.54 Section 504:34 CFR § 104.11(a) (b)	A nonfaculty classification /compensation system is in place which evaluates jobs and places them in appropriate salary ranges according to working conditions and levels of employment responsibility.	Nonfaculty salary schedules and related policies.				
		Nonfaculty assignment information by race/ethnic group, sex, and staff with a disability.				
<b>Comments</b>						
<b>D.</b>						
1. Requires recipients to provide equal employment opportunities for teaching and administrative positions to applicants with a disability who can perform the essential functions of the positions; and make reasonable accommodations for the physical or mental limitations of (otherwise qualified) applicants with a disability unless it can be demonstrated that such accommodations would impose undue hardship. Section 504:34 CFR § 104.12 Guidelines VIII-E	Recipient's employment policies do not unlawfully discriminate against persons with disabilities.  Persons with disabilities are employed in teaching and administrative positions and are not treated differently in promotion and tenure decisions.	Number of staff with disabilities.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Copies/description of policies, procedures and criteria considered for hiring, promotion, retention, and tenure including professional and nonprofessional applications.				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>E.</b>						
1. Requires recipients to take steps to overcome the effects of past discrimination. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, sex, or who have a disability. <u>Guidelines VIII-F</u>	<u>Recruitment efforts are not limited</u> to schools, communities, or companies that are unequally composed of persons of a particular race, national origin, sex, or those who have a disability.  Local agency or postsecondary institution <u>has</u> : An affirmative action/equal employment opportunity plan adopted by the board.  Taken steps to implement the affirmative action plan.  Made substantial progress in taking steps to overcome the effects of past discrimination.	Status report or description of recruitment activities including sources and contacts.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Description of any affirmative action taken or planned (if any) to overcome the effects of past discrimination.				
<b>Comments</b>						

### 3. COUNSELING AND PRE-CAREER and TECHNICAL PROGRAMS

#### Counseling Issues

Counseling for career and technical programs may not include directing or urging any students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A.</b>						
1. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration. Recipients must ensure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability. <u>Title IX:34 CFR § 106.21 (a)(b), §106.36 (a), and § 106.34</u> <u>Section 504:34 CFR § 104.4 (a), § 104.34(a)(c),and § 104.47 (b)</u> <u>Guidelines V-A</u>	The written guidance plan, policy, and procedures ensure nondiscrimination, including a written statement that lack of English language skills is not a barrier to participation in any course.  The written assessment plan ensures nondiscrimination.	Guidance plan, policy, and procedures				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Assessment plan with a list of tests administered				
		Procedures for evaluation and placement of students with disabilities				
		IEP/504 policies and procedures				
		Promotional and recruitment materials				
		Enrollment demographics				
		Recruitment, admission policies				
		Calendar of precareer and technical counseling activities				
<b>Comments</b>						



Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>B.</b>						
1. Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program based upon the student's race, color, national origin, sex, or disability. <u>Title IX:34 CFR § 106.34</u> <u>Sec 504:34 CFR § 104.47(b)</u> <u>Guidelines V-B</u>	Enrollments based on gender, race, national origin, and disability are proportionate to the general student population.  Where enrollments are not proportionate, the Division can furnish a legitimate, nondiscriminatory rationale.	Admission criteria				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Enrollment forms				
		Enrollment demographics by class/program				
		Interest and ability tools				
<b>Comments</b>						
<b>C.</b>						
1. Recipients may not counsel students with a disability toward more restrictive career objectives than students without a disability with similar abilities and interests. <u>Section 504:34 CFR § 104.37(b)</u> <u>Guidelines V-B</u>	Students with disabilities have equal access to all programs and classes based on abilities and interests.	Pre-enrollment counseling activities				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Enrollment data				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>D.</b>						
1. If unequal enrollments occur, efforts must be made to assure that counseling services and materials are not responsible. Recipients must take steps to ensure that any unequal enrollment does not result from unlawful discrimination in counseling activities. <u>Title IX:34 CFR § 106.36 Guidelines V-B</u>	Recipient has process in place to identify unequal enrollment. When unequal enrollment occurs, recipient assesses counseling materials and activities and makes appropriate revisions or can furnish a legitimate, nondiscriminatory rationale.	Pre-enrollment counseling activities, including completed interest and ability tools Enrollment data				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Revised counseling materials and/or activities in response to unequal enrollments or nondiscriminatory rationale for unequal enrollment				
<b>Comments</b>						
<b>E.</b>						
1. Recipients must ensure that counselors can effectively communicate with students with limited English proficiency and with students with hearing impairments. <u>Guidelines V-D</u>	The content of materials available to English speaking students and their parents is available to students and parents who speak languages other than English.  Formats other than the printed word are available for students with disabilities.  This requirement may be satisfied by having interpreters available.	Plan for the provision of recruitment and precareer and technical counseling services for ESL individuals				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Plan for provision of recruitment and pre-career and technical services for individuals with hearing impairments				
		Samples of materials in other languages/formats				
		Current list of available interpreters, languages covered				
	<b>Comments</b>					

**4. RECRUITMENT**

Recruitment Issues

Recruitment activities and materials should convey the message that all career and technical programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Lack of English language skills must not be a barrier to admission and participation in career and technical education programs. Recruitment teams, to the extent possible, should represent persons of different races, national origins, sexes, and abilities.

Equity Requirement/ <u>Legal Citations</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	

**A.**

1. Recipients must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability. <u>Title IX:34 CFR § 106.23 (a)(b) Guidelines V-C</u>	All potential students have access to information. Efforts are made to reach underrepresented groups.	Recruitment plans				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		List of recruitment activities and sites				
		Description of recruitment activities				
	<b>Comments</b>					

**B.**

1. Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disability. <u>Guidelines V-C</u>	Descriptions of career opportunities are bias-free and free from stereotyping	Recruitment brochures and marketing materials				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A	
		Course catalog					
	<b>Comments</b>						

Equity Requirement/ <u>Legal Citations</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>C.</b>						
1. To the extent possible, recruiting teams should represent persons of differing races, national origins, sexes, and abilities. <u>Guidelines V-C</u>	Where possible, persons of differing races, genders, and abilities are used for recruiting purposes.	Staff demographics by program				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Recruitment team demographics				
<b>Comments</b>						
<b>D.</b>						
1. Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. <u>Guidelines V-E</u>	Materials and or media presentations show persons of differing races, male and female, persons with disabilities, and of different national origins.	Promotional materials, including brochures, flyers, newspaper advertising, catalogs				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Examples of promotional efforts, such as career days, parents nights, shop demonstrations, visitations by groups of prospective students, and presentations by representatives from business and industry				
<b>Comments</b>						
2. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration. <u>Guidelines V-E</u>						
<b>E.</b>						
1. If a recipient's service area contains a community with national minority persons with limited English language skills, promotional material must be distributed to that community in its language. <u>Guidelines V-E</u>	Process is in place to identify and communicate with language minority communities. In communities where multiple dialects are spoken, efforts are made to communicate in the most commonly understood language.	Verification of limited English proficient community.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Samples of materials in other languages.				
<b>Comments</b>						

**5. ACCESS AND ADMISSIONS**

Admission Issues

Admission policies, procedures, and criteria may not exclude students from career and technical programs on the basis of race, color, national origin, sex, or disability. Where admissions criteria exclude a unequal number of persons of a particular race, color, national origin, sex, or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status must be avoided.

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A.</b>						
1. Educational institutions may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of unequally excluding persons of a particular race, color, national origin, sex, or disability. If such unequal exclusion occurs, the criteria or standards must be validated as essential to participation. <u>Guidelines IV-K</u>	Demographics of career and technical enrollments are proportionate to demographics of eligible pool. Demographics of specific career and technical programs are proportionate to demographics of entire career and technical enrollment. If disproportionality exists, the Division must provide a legitimate nondiscriminatory rationale.  Admissions procedure, policy, and/or practice for career and technical program enrollment avoid criteria that unequally exclude persons of a particular race, color, national origin, sex, or disability status. If disproportionality exists, the Division must provide a legitimate nondiscriminatory rationale.	Admissions policy and process for career and technical education programs				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Procedures and criteria for selective admissions for career and technical programs (where there are more applicants than can be accommodated)				
		List of nonselected students by demographics and by each selection criterion				
		Demographics of selected applicants by selection criteria				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>B.</b>						
1. Preadmission inquiries must avoid reference to marital, parental, or disability status. <u>Title IX:34 CFR § 106.21(c)</u> <u>Section 504: 34 CFR § 104.42 (b)(4)</u> <u>TITLE II: 28 CFR 35</u>	Application forms and materials do not request information about marital, parental, or disability status	Admissions application for secondary and/or adult career and technical education program.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	<b>Comments</b>					
<b>C.</b>						
1. Assurances have been made that numerical limitations or separate rankings on the basis of race, color, national origin (including migrant education status), sex, or disability do not exist in admitting students to career and technical education programs. <u>Title VI:34 CFR § 100.3</u> <u>Title IX:34 CFR § 106.21(b)</u> <u>Section 504:34 CFR § 104.42(B)(1)</u> <u>Guidelines IV-F</u>	Policies and procedures do not use a numerical system of admissions if such systems result in enrollment nonproportional to the service area on the basis of race, color, sex, national origin, or disability.	Admissions criteria				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Demographics for service area				
		Demographics for program area				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>D.</b>						
1. Supplementary aids, modified instructional material, and special services are provided to students with disabilities to enable them to participate equally in career and technical programs. <u>Section 504:34 CFR § 104.44 (d)(2)Guidelines IV-N</u>	Document all supplementary aids and services available to students with a disability who need special accommodations or assistance in order to succeed in a career and technical education program. <i>Please note:</i> This list should also identify the providers of such services.  Agency provides appropriate aides, modifications, and services for students with disabilities and does not have policies that limit participation of students with disabilities.	Example of equipment adapted/modified				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Description of policy for providing aids, modification, and services				
		Description of aids, modification, and services available/provided				
		Policies governing the use of guide dogs, tape recorders, note takers, etc.				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>E.</b>						
<p>1. A recipient may not restrict admission to career and technical programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical to the same extent as students whose primary language is English.</p> <p>2. An elementary and secondary recipient must take steps to open all career and technical programs to national origin minority students with limited English proficiency. <u>Guidelines IV-L</u></p>	<p>Recipient has a procedure in place to identify and assess applicants with limited English proficiency.</p> <p>LEP enrollment in career and technical education is proportional to LEP enrollment in the service area</p> <p>LEP enrollment in specific career and technical programs is proportional to LEP enrollment in career and technical education overall.</p>	Procedure for LEP identification and placement.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Summary of steps taken to increase LEP participation in programs where they traditionally have been underrepresented.				
		Specific program enrollment demographics by LEP status.				
<b>Comments</b>						



## 6. SERVICES FOR STUDENTS WITH DISABILITIES

### Services For Students with Disabilities Issues

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and ADA Title II are based upon the premise that students with disabilities will be integrated with their non-disabled peers as much as possible.

Recipient must locate students with disabilities who may be in need of support and services, determine eligibility, provide appropriate accommodations to include auxiliary aids, not discriminate on the basis of disability in classes, programs, extracurricular activities to include Division sponsored activities.

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A.</b>						
1. No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of disability. <u>Section 504: 34 CFR § 104.4(a)</u> <u>Title II: 28 CFR § 35.130(a) Guidelines IV-N</u>	The recipient implements policies and procedures ensuring access for students with disabilities to programs, services, and activities.	Board policy				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Student handbooks				
		Procedures for selection into clubs, activities, and programs				
		Criteria for admission into courses, programs, services, and activities				
		Location of clubs and their activities				
		Any other methods that result in making its program or activity accessible to persons with disabilities				
		Assignment of aides				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>B.</b>						
<p>1. Students with disabilities must not be excluded from Career and Technical, career, or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.</p> <p>2. The institution does not impose ADDITIONAL RULES on students with a disability which have the effect of limiting participation.  <u>Section 504:34 CFR § 104.33,</u>  <u>Section 504:34 CFR § 104.44(b)(d)</u>  <u>TITLE II: 28 CFR 35 § 35.130(b)(8), 35.160(b)(1)</u>  <u>Guidelines IV-N</u></p>	<p>The agency provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities.</p>	Example(s) of equipment adapted				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Policy for addressing equipment barriers				
		Policy for providing aids, accommodations, and services				
		Description of aids, accommodations, and services available/provided				
		List of materials/resources available for seeing or hearing impaired				
		Policies governing use of guide dogs, tape recorders, note takers, etc.				
<b>Comments</b>						
<b>C.</b>						
<p>1. Access to career and technical and academic programs or courses is not denied to students with a disability on the basis that EMPLOYMENT OPPORTUNITIES in any occupation or profession may be more limited for persons with a disability than for persons without a disability.  <u>Section 504:34 CFR § 104.10</u>  <u>Section 504:34 CFR § 104.43(c)</u>  <u>Guidelines IV-N</u></p>	<p>The recipient does not discourage students with disabilities from participating in programs due to potential workplace discrimination.</p>	Career and college counseling materials				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Program of studies				
		Number of students with a disability in various courses and programs				
		Number of students with disabilities by program				
		Placement/follow-up data				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>D.</b>						
1. ACADEMIC REQUIREMENTS have been adjusted to meet the needs of individual students with a disability. <u>Section 504:34 CFR § 104.44(a)</u> <u>TITLE II: 28 CFR 35 § 35.130(b)(7)</u> <u>Guidelines IV-N</u>	The recipient adjusts academic requirements as appropriate to meet the needs of students with disabilities.	Number of students with a disability in various courses and programs				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Programs in which essential requirements or licensing requirements have prevented access				
<b>Comments</b>						
<b>E.</b>						
1. Admission and TESTING policies or other procedures for evaluating students' academic achievements are administered in such a way that the aptitudes or achievement levels or other relevant factors of students with disabilities are measured and not the disability. <u>Section 504:34 CFR § 104.44(c)</u> <u>Guidelines IV-N</u> <u>TITLE II: 28 CFR 35 § 35.130(b)(8)</u>	The recipient accommodates needs of students with disabilities during testing.	Accommodations such as:				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Extended time				
		Alternative formats				
		Location of testing; facility accessibility auditory/lighting adequacy				
		Calculator or other auxiliary aids as needed				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>F.</b>						
1. In providing or arranging for the provision of NONACADEMIC and extracurricular services and activities, persons with disabilities participate with persons without disabilities in such activities and services to the maximum extent appropriate to their needs. <u>Section 504:34 CFR §104.34(b)</u> <u>Section 504:34 CFR § 104.43(d) Guidelines VI-A;</u>	Students with disabilities participate with students without disabilities in nonacademic services and activities to the maximum extent appropriate to their needs.	Description of procedures				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Participation data on students with disabilities				
<b>Comments</b>						
<b>G.</b>						
1. Persons with disabilities are provided ACCESS TO INFORMATION regarding admission to programs, courses and activities. <u>Guidelines IV-N</u> <u>TITLE II: 28 CFR 35 § 35.160(a); 35.161</u>	Information regarding admission to programs, courses, and activities is provided in alternate formats for students with disabilities.	List of programs and activities (internships, OJT programs, child care)				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Criteria for participation				
		Catalog, student handbook, and brochure descriptions of programs and activities				
		Any materials available in an alternate format				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>H.</b>						
1. Any activity or program, not operated by the institution but considered a part of, or EQUIVALENT to an institution's program, is operated in a manner which provides equal opportunities to qualified persons with a disability. <u>Section 504:34 CFR § 104.4(b) Guidelines IV-N</u> <u>TITLE II: 28 CFR 35 § 35.130(b)(1)</u>	Agency programs such as charter schools and OJT operated by outside agencies provide equal opportunities to students and staff with disabilities.	List of equivalent programs and activities (internships, OJT programs, child care, special programs in cooperation with business or industry, pre-K programs, after-school programs)				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Criteria for participation				
		Catalog, student handbook and brochure descriptions of programs and activities				
<b>Comments</b>						
<b>I.</b>						
1. Facilities, services, or activities IDENTIFIABLE as being for persons with a disability, are comparable to those offered to students without a disability. <u>Section 504:34 CFR § 104.34(c)</u> <u>Guidelines VI-A</u>	Facilities, services, and activities serving primarily students with disabilities are comparable to those for students without a disability.	Course catalogs, descriptions				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Location & description of separate facilities, services, activities				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>J.</b>						
1. PROGRAMS OPEN TO PARENTS or PUBLIC (including graduation ceremonies, athletic events, plays, lectures) are accessible. <u>Title II: 28 CFR § 35.102</u> <u>Guidelines IV-N</u>	Public events are held in accessible facilities.	Location & description of events				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Buildings meet ANSI, UFAS OR ADAAG standards				
<b>Comments</b>						
<b>K. Elementary and Secondary 504 Services</b>						
1. A recipient that operates an elementary or secondary program or activity must provide a free, appropriate public education (FAPE) to each qualified person with a disability in its jurisdiction. The recipient must have a system in place for the identification, evaluation, and educational placement of these persons 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. The recipient must provide procedural safeguards through which parents or guardians may obtain an impartial review of the evaluation and placement actions. <u>Section 504: 34 CFR § 104.33, 35, and 36</u>	Policies and procedures are provided ensuring FAPE.  Placement decisions are fully documented and timely re-evaluations are conducted.  Persons who are knowledgeable about placement options in Career and Technical programs participate in Career and Technical placement decisions.	FAPE policies and procedures				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		A description or list of the materials and persons relied upon in the evaluation and placement process				
		Description of the system of procedural safeguards				
		List of persons with knowledge of Career and Technical programs who participate in FAPE placement decisions for Career and Technical programs				
		Section 504 plans, placement records, IEPs, and similar records of students with disabilities placed in Career and Technical programs				
<b>Comments</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
2. Secondary students with disabilities must be placed in the regular educational environment of any Career and Technical, academic, physical education, athletic, or other school program or activity to the maximum extent appropriate to their needs with the use of supplementary aids and services. <u>Section 504: 34 CFR § 104.34(a)(b)</u> <u>Title II: 28 CFR § 35.130(d) Guidelines VI-A</u>	Students with disabilities enroll in regular academic courses to the maximum extent appropriate to their needs.	Number of students with a disability in various courses and programs				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Selection/admission criteria and procedures				
		Section 504 plans, placement and similar records				
	<b>Comments</b>					
3. Secondary students with disabilities are placed in a Career and Technical program only when the 504 FAPE requirements for evaluation, placement, and procedural safeguards have been satisfied. <u>Section 504: 34 CFR § 104.35(a)</u> <u>Guidelines VI-A</u>	Section 504 plan, placement record, or IEP reflects the group's or team's determination that the Career and Technical program is appropriate setting for the individual student.	Sample placement records for students with disabilities				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Evaluation procedures				
		Placement criteria and procedures				
		Procedural safeguards				
	<b>Comments</b>					

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
4. Admissions and testing policies, course examinations, or other procedures for evaluating students' academic achievements are administered in such a way that aptitudes or achievement levels or other relevant factors of students with disabilities are measured and not the disability. <u>Section 504: 34 CFR § 104.44(c)</u> <u>Title II: 28 CFR § 35.130(b)(8)</u> <u>Guidelines IV-N</u>	The recipient accommodates needs of students with disabilities during testing.	Accommodations such as:				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Extended time				
		Alternative formats				
		Location of testing; facility accessibility auditory/lighting adequacy				
		Calculator or other auxiliary aids as needed				
<b>Comments</b>						



## 7. ACCESSIBILITY

### 504/ADA Accessibility Issues

Recipient may not exclude students or community members with disabilities from enjoying the benefits of its program or service because its facilities are inaccessible to or unusable by persons with disabilities. Architectural barriers do not prevent students or otherwise qualified persons with disabilities to include parents and/or other community members with disabilities from having ACCESS to vocational, career or academic programs, courses, services, or activities.

Section 504:34 CFR § 104.21

Title II: 28 CFR § 35.150(a)

Title II: 28 CFR § 35.151(a)(b) Guidelines IV-N

Interviews with the following persons may clarify compliance with this standard: Agency CEO, School counselors, Department Chairs, ADA and 504 Coordinators, Coordinator for Disabled Student Services, Facilities Director. In addition to interviews, a visual inspection of facilities should be conducted. Blueprints. Construction contracts. Work orders.

Applicable accessibility standards are determined by the date the facility was constructed or last renovated by the institution.

- Existing facilities/Section 504 (34 CFR, 104.22) - construction or alteration initiated before 6/4/77 - "readily accessible"
- New construction/Section 504 (34 CFR 104.23) - construction or alteration initiated between 6/4/77 and 1/17/91 – ANSI A117.1-1961 (R1971)
- New construction/Section 504 (34 CFR 104.23) - construction or alteration initiated on or after 1/18/91 - UFAS
- New construction/ ADA (28 CFR 35.151) - construction or alteration initiated on or after 1/27/92 – ADA (1991) or UFAS
- New construction/ADA - 28 CFR 35.151 (R 2008) - construction or alteration initiated on or after 3/15/2012- ADA (2010)

List all building(s) associated with the secondary school including the date(s) of construction, last renovation and any career and technical program(s) offered therein.

<u>building</u>	<u>date of construction and alteration(s)</u>	<u>CTE programs</u>

7. ACCESSIBILITY						
Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A. Existing facility under 504 – Built or altered beginning June 3, 1977, or earlier</b>						
1. A recipient shall operate its program or activity so that when each part is viewed in its entirety, it is readily accessible to disabled persons. A recipient is not required to make each of its existing facilities or every part of a facility accessible to and usable by persons with disabilities. <u>Section 504: 34 CFR § 104.22</u>	<ul style="list-style-type: none"> <li>• redesign of equipment</li> <li>• reassignment of classes or other services to accessible buildings</li> <li>• assignment of aides to beneficiaries</li> <li>• home visits</li> <li>• alteration of existing facilities and construction of new facilities in conformance with the requirements for new construction or</li> <li>• any other methods that result in making its program or activity accessible to persons with disabilities</li> </ul>	• Observations and measurements				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		• Renovation schedules				
		• Maintenance records				
		• Work orders or contracts indicating construction start dates				
<b>Comments</b>						
<b>7. ACCESSIBILITY</b>						

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>B. New construction under 504 – Built or altered between June 4, 1977, and January 17, 1991, inclusive</b>						
1. Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient is designed and constructed in such a manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the “American National Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, the Physically Disabled,” published by the American National Standards Institute, Inc. (ANSI A117.1-1961 (R1971) Later versions of ANSI A117.1 do not apply. <u>Section 504: 34 CFR § 104.23</u> (prior to January 18, 1991 amendment)	ANSI Standards have been met	• Blueprints and plans				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		• Renovation schedules				
		• Maintenance records				
		• Work orders or contracts indicating construction start date				
		Verification of ANSI Standards being met as follows: 4.1 Grading 4.2 Walks 4.3 Parking lots 5.1 Ramps and gradients 5.2 Entrances 5.3 Doors and doorways 5.4 Stairs 5.5 Floors 5.6 Toilet rooms 5.7 Water fountains 5.8 Public phones 5.9 Elevators 5.10 Controls 5.11 Identification 5.12 Warning signals 5.13 Hazards				
<b>Comments</b>						

**7. ACCESSIBILITY**

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>C. New construction under 504 – Built or altered between January 18, 1991, and January 26, 1992, inclusive New construction under ADA Title II and 504 – Built after January 26, 1992; exercising the option to follow UFAS</b>						
<p>1. Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by person with disabilities. <b>Conformance with Uniform Federal Accessibility Standards (UFAS)</b> (Appendix A to 41 CFR subpart 101-19.6). or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. <b>Conformance with Uniform Federal Accessibility Standards (UFAS)</b> (Appendix A to 41 CFR subpart 101-19.6).</p> <p>2. Departures from particular technical and scoping requirements permitted where substantially equivalent or greater access to and usability of the building is provided. <u>Section 504: 34 CFR § 104.23</u> <u>Title II: 28 CFR § 35.151</u></p>	UFAS standards have been met	<p><b>Work orders or contracts indicating verification of UFAS standards being met as follows:</b></p> <p>4.1 Minimum requirements 4.2 Space allowance and reach ranges 4.3 Accessible route 4.4 Protruding objects 4.5 Ground and floor surfaces 4.6 Parking and passenger loading zones 4.7 Curb ramps 4.8 Ramps 4.9 Stairs 4.10 Elevators 4.11 Platform lifts 4.12 Windows 4.13 Doors 4.14 Entrances 4.15 Drinking fountains and water coolers 4.16 Water closets 4.17 Toilet stalls 4.18 Urinals 4.19 Lavatories and mirrors 4.20 Bathtubs 4.21 Shower stalls 4.22 Toilet rooms 4.23 Bathrooms, bathing facilities, and shower rooms 4.24 Sinks 4.25 Storage 4.26 Handrails, grab bars, tub and shower seats 4.27 Controls and operating mechanisms 4.28 Alarms 4.29 Tactile warnings 4.30 Signage</p>				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
<b>7. ACCESSIBILITY</b>						

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>D. New construction under ADA Title II and 504 – Built after January 26, 1992; exercising the option to follow ADAAG</b>						
<p>1. Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with Conformance with the Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) (Appendix A to 34 CFR Part 36).</p> <p>2. Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. <u>Section 504: 34 CFR § 104.23</u> <u>Title II: 28 CFR § 35.151</u></p>	ADA standards have been met	<ul style="list-style-type: none"> <li>• Blueprints and plans</li> </ul>				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		<ul style="list-style-type: none"> <li>• Renovation schedules</li> </ul>				
		<ul style="list-style-type: none"> <li>• Maintenance records</li> </ul>				
		<ul style="list-style-type: none"> <li>• Work orders or contracts indicating construction start dates</li> </ul>				
		<p>Verification of ADA standards being followed as follows:</p> <p>4.1 Minimum requirements</p> <p>4.2 Space allowance and reach ranges</p> <p>4.3 Accessible route</p> <p>4.4 Protruding objects</p> <p>4.5 Ground and floor surfaces</p> <p>4.6 Parking and passenger loading zones</p> <p>4.7 Curb ramps</p> <p>4.8 Ramps</p> <p>4.9 Stairs</p> <p>4.10 Elevators</p> <p>4.11 Platform lifts (wheelchair lifts)</p> <p>4.12 Windows</p> <p>4.13 Doors</p> <p>4.14 Entrances</p> <p>4.15 Drinking fountains and water coolers</p> <p>4.16 Water closets</p> <p>4.17 Toilet stalls</p> <p>4.18 Urinals</p> <p>4.19 Lavatories and mirrors</p> <p>4.20 Bathtubs</p>				

**7. ACCESSIBILITY**

**D. New construction under ADA Title II and 504 – Built after January 26, 1992; exercising the option to follow ADAAG**

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
		4.21 Shower stalls 4.22 Toilet rooms 4.23 Bathrooms, bathing facilities, and shower rooms 4.24 Sinks 4.25 Storage 4.26 Handrails, grab bars, tub and shower seats 4.27 Controls and operating mechanisms 4.28 Alarms 4.29 Detectable warnings 4.30 Signage 4.31 Phones 4.32 Fixed or built-in seating or tables 4.33 Assembly areas 4.34 Automatic teller machines 4.35 Dressing and fitting rooms Other requirements				
<b>Comments</b>						

**8. COMPARABLE FACILITIES**

Comparable Facilities Issues:

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers, and other 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 students with disabilities should be located in similar proximity to the associated classrooms, shops, or laboratories.

Equity Requirement/	Indicators of Compliance	Documentation	Division Use	State Use Only
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Legal Cites			Yes	No	Not Sure	(Comments/Action)
<b>A.</b>						
<p>1. If separate programs or facilities exist for students with disabilities, they are comparable to those for students without disabilities.  <u>Section 504: 34 CFR § 104.34(c)</u>  <u>Guidelines VI-A</u></p>	<p>Facilities are comparable.  Programs are comparable.  Services are comparable.</p>	<p>Comparison of programs and services offered to both students with disabilities and students without disabilities  Location &amp; description of separate facilities, services, activities</p>				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
<b>Comments</b>						
<b>B.</b>						
<p>1. Changing rooms, showers, and other facilities for students of one sex are comparable to those provided to students of the other sex.  2. Changing rooms, showers, and other facilities for students with disabilities are comparable to those provided to students without disabilities.  <u>Title IX: 34 CFR § 106.33</u>  <u>Section 504: 34 § CFR 104.4(b)(ii)</u></p>	<p>Locker rooms have approximately the same space and amenities for both males and females.  <b>If there is disparity, the recipient provides a legitimate, nondiscriminatory rationale.</b>  Changing rooms, showers, bathrooms, and other facilities near the career and technical areas are comparable for both men and women and conveniently accessible to persons with disabilities.</p>	<p>Comparison of facilities offered to male and to female students  Comparison of facilities offered to students with disabilities and to students without disabilities</p>				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
<b>Comments</b>						

**9. STUDENT FINANCIAL ASSISTANCE**

Financial Assistance Issues

Financial assistance (in the form of loans, grants, scholarships, special funds, subsidies, compensation for work or prizes to students) should not be awarded on the basis of race, color, national origin, sex, or disability. However, sex restricted financial assistance that was established by will, trust, or bequest may be administered as long as the overall effect of all financial assistance does not discriminate on the basis of sex.

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A.</b>						
1. Financial assistance is available to all students regardless of sex, race, color, national origin, or disability for all students. <u>504 34 CFR 104.46(a)</u> <u>Title VI:34 CFR § 100.3(b)</u> <u>Title IX:34 CFR § 106.37</u> <u>Guidelines VI-B</u>	Recipient data on financial aid demonstrates there is equitable distribution of financial aid regardless of sex, race, color, national origin, or disability.	Recipient of financial aid data broken out by sex, race, color, national origin, or disability.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	<b>Comments</b>					
<b>B.</b>						
1. Sex specific awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex, race, ethnicity, or disability. <u>Title VI:34 CFR § 100.3(b)</u> <u>Title IX:34 CFR § 106.37</u> <u>Guidelines VI-B</u>	Overall, the recipient financial assistance is equitable regardless of sex, race, ethnicity, or disability	List of all financial assistance given as a result of rewards				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Total list of financial aid awarded				
		Documentation is available as to the # and \$ given as a result of will, trust, bequest, or other legal instrument.				
<b>Comments</b>						



**9. STUDENT FINANCIAL ASSISTANCE**

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)						
			Yes	No	Not Sure							
<b>C.</b>												
1. Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis. <u>Guidelines VI-B</u>	Materials written provide information equitably.  All written materials contain the nondiscrimination statement.  Institutional awards provided as a result of the group being historically underrepresented or as a result of a bequest, trust, or other legal instrument is acknowledged as such in the written materials.	Materials written for students and families concerning the financial assistance available.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A						
							<b>Comments</b>					
<b>D.</b>												
1. English Language Learners and their parents receive information about financial assistance in their own language. <u>Guidelines VI-B</u>	Community demographics indicate English Language Learners are a part of the population served.  If a recipient's service area contains a community of national origin minority persons with limited English language skills such information must be distributed to that community in its language.	Written information about financial assistance is provided to national origin minority students and their parents in their home language				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A						
		Demographics of the area served										
		<b>Comments</b>										

**10. Work-Based Learning**

Work-Based Learning Issues:

An agency not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the race, sex, national origin, or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of race, sex, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksite indicates that they will not discriminate and that they understand the school will not work with any business that does. It is necessary to review these written agreements, the assignments of students presently in such programs and the placement process to see whether any such patterns exist.

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A.</b>						
1. Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.31(d)</u> <u>Section 504: 34 CFR 104.4(b)</u> <u>Guidelines VII-A</u>	Students in the work study, cooperative education, and job placement programs are representative of the demographics of the school or program.  If there is a disparity, the institution provides a legitimate, nondiscriminatory rationale.	Review of enrollment data in work study, cooperative education and job placement programs				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with staff and students				
<b>Comments</b>						

10. Work-Based Learning						
Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>B.</b>						
1. A recipient that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and pay. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.38</u> <u>Section 504: 34 CFR 104.46(b)</u> <u>Guidelines VII-A</u>	Workplace agreements contain an assurance of nondiscrimination that is signed by both the employer and the agency.  The recipient does not honor any employer's request for students who are free of disabilities or for students of a particular race, color, national origin, or sex.	Review of workplace assignments, hours of work, and job assignments				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with staff and students.				
	<b>Comments</b>					

**11. Site Location**

Site Location Issues:

Vocational Education Guidelines, Sections IV-A through IV-K, establish standards that site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability.

Issues that could result in discrimination or segregation include the selection of sites for vocational education facilities, establishing geographic residence requirements, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, and any other criteria that have the purpose or effect of unequally excluding students of a particular race, national origin, sex, or disability.

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
<b>A. Site Selection and Modifications</b>						
1. Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. <u>Guidelines IV-B</u>	Vocational sites are readily accessible to minority and non-minority communities and their location does not have a segregative effect.	Maps showing location of vocational facilities				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Enrollment demographics for each facility				
		Demographics of communities surrounding facility				
<b>Comments</b>						

11. Site location						
Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Division Use			State Use Only (Comments/Action)
			Yes	No	Not Sure	
1. A recipient may not add to, modify or renovate the physical plan of a vocational facility in a manner that creates, maintains or increases segregation on the basis of race, color, national origin, sex, or disability. <u>Guidelines IV-D</u>	After modification, the vocational site is readily accessible to the minority and nonminority communities and the modification does not have a discriminatory effect.	Maps showing location of the modified vocational facilities.				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Student demographics before and after facility modifications.				
		Demographics of communities surrounding the facility.				
	<b>Comments</b>					
<b>B. Residency</b>						
1. A recipient may not establish, approve or maintain geographic boundaries that unlawfully exclude students on the basis of race, color or national origin. <u>Guidelines IV-C</u>	Attendance zones do not have the effect of excluding students on the basis of race, color, or national origin.	Maps of attendance zones				<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Demographics of contiguous service areas to the facility				
		Curriculum offering at contiguous facilities				
		Job placement rates at contiguous facilities				
	<b>Comments</b>					