

## Overview of the CTE Civil Rights Review Process

Laws and Regulations Required by the U.S. Department of Education Office for Civil Rights  
and Enforced by Virginia Department of Education

-  Title VI of the Civil Rights Act of 1964 (prohibiting discrimination based on race, color, and national origin) *34 CFR Part 100*
-  Title IX of the Education Amendments of 1972 (prohibiting discrimination based on sex)  
*34 CFR Part 106*
-  Section 504 of the Rehabilitation Act of 1973 (prohibiting discrimination based on disability)  
*34 CFR Part 104*
-  Title II of the Americans with Disabilities Act of 1990 (prohibiting discrimination based on disability)  
*28 CFR Part 35*
-  Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin and Handicap (Guidelines) *34 CFR Part 100 Appendix B*

### Targeting Plan Criteria for Identifying Four (4) School Divisions for Review from the Targeting Pool Cycle

<u>Indicators</u>	<u>Point Values</u>
1) The number of the subrecipient’s schools that offer CTE programs (career centers, alternative schools, regional career and technical centers, and any other facilities offering CTE program)	+1 <b>point</b> is assigned to each secondary school that offers CTE in the division
2) The number of the subrecipient’s CTE programs that have unrepresentative enrollment of either sex (over 75% or under 25%)	+3 <b>points</b> are assigned to each program in the division that is unrepresentative by sex
3) The enrollment of students with disabilities in CTE courses compared to the subrecipient’s secondary enrollment of students with disabilities (=/-10% or greater)	+10 <b>points</b> are assigned to each division having an unrepresentative number of students with disabilities in CTE programs
4) The number of limited English proficient (LEP) subgroups that comprise 5% or more of the subrecipient’s enrollment	+5 <b>points</b> are assigned to each LEP subgroup that comprises 5% or more of the division’s enrollment
5) The enrollment of students with minority status in CTE courses compared to subrecipient’s secondary enrollment of students with minority status (10% or greater difference)	+10 <b>points</b> are assigned to each division having an unrepresentative number of minority secondary students in CTE programs
6) The number of years since division’s last on-site civil rights review	+0 <b>points</b> for 6 years of less +5 <b>points</b> for 7 to 12 years +10 <b>points</b> for 13 to 19 years +15 <b>points</b> for 20 or more years

## Review Structure

**Desk Review:** Enrollment (school-wide and CTE), student race/ethnic/sex/disability demographics (school-wide and CTE), CTE admission requirements and programming, websites (division and secondary schools), staff demographics/pay, and policy/procedures manuals (staff and parents/students), student and staff recruitment materials (including applications), work-based learning, and information provided on buildings and grounds and determine accessibility standard

**On-Site Review:** Interview of central office administration, building administration, CTE teaching staff, Section 504 building coordinator, ESL/LEP teacher, transition specialist, work-based learning coordinator, special education lead teacher/building coordinator, school counselors, and CTE students; and complete accessibility walk-through of building and grounds.

## Post On-site Review

**Letter of Findings:** School divisions receive a written **draft** Letter of Findings (LOF) containing findings, recommendations, and commendations within **45 calendar days** following the review. The LOF covers the following OCR designated required areas:

- Administrative
- Employment
- Counseling
- Recruitment
- Access and Admissions
- Services for Students with Disabilities
- Accessibility
- Comparable Facilities
- Student Financial Assistance
- Work-Based Learning
- Site Location

- School divisions have **14 calendar days** to review and respond to the draft LOF. If there are no questions, notify the reviewer of your acceptance of the report as written. If there are questions, technical assistance will be provided. If no response is received from the division, the draft report will become final after **14 calendar days**.

**Voluntary Compliance Plan:** If the development of the Voluntary Compliance Plan (VCP) occurs on schedule, the finalized VCP should be submitted to VDOE a maximum of **90 calendar days** from the date of the LOF. (See [Directions for Developing a Voluntary Compliance Plan and Template](#)).

**Letter of Closure:** Upon receipt of the documentation that supports the successful completion of the **entire** VCP, a letter of closure of the civil rights review will be sent to the division superintendent.