

**Michigan Department of Education  
Office of Career and Technical Education  
Civil Rights Compliance Review  
Agency Voluntary Compliance Plan for Ionia ISD**

**Building Name(s):** Ionia High School, Ionia ISD

**Agency Code:** 34000

**On Site Review Date:** 10/28/2025 - 10/28/2025

**Voluntary Compliance Plan Due Date:** 01/26/2026

Change Required	District Action Steps that will be Implemented to Achieve the Change Required	Dates Action Steps Will Be Completed	Position of Person(s) Responsible	Evidence and Date of Completion
<b>A. ASSURANCES</b>				
Evidence provided demonstrates the education agency has submitted all assurances. (Title VI of the Civil Rights Act of 1964, Section 100.4 (a and b); Title IX of the Education Amendments of 1972, Section 106.4; Section 504 of the Rehabilitation Act of 1973, Subpart 104.5; and Boy Scouts of America Equal Access Act of 2001 [secondary])				
<b>B. POLICY ADOPTION</b>				
Evidence provided demonstrates the educational agency has adopted an appropriate (comprehensive) policy statement of nondiscrimination that covers Title VI, Title IX, and Section 504. No violation identified. (Title IV of the Civil Rights Act of 1964, CFR 100.6; Title IX of the Education Amendments of 1972, Section 106.1; and Section 504 of the Rehabilitation Act of 1973, 34 CFR 104)				
<b>C. SPECIFIC EMPLOYEE DESIGNATION</b>				
Evidence provided demonstrates the educational agency has designated specific employees as coordinators for Title IX, Section 504, and Title II. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.8(a); Section 504 of the Rehabilitation Act of 1973, Subpart 104.7(a); and Title II of the Americans with Disabilities Act of 1990, Section 35.107)				
<b>D. CONTINUOUS NOTICE OF NONDISCRIMINATION</b>				
Evidence provided did not demonstrate that the educational agency has disseminated an appropriate nondiscrimination policy that includes the name or title, office address, telephone number, and email of the coordinator(s) to students, parents/guardians, employees, and the general public on a continuing basis. (Title VI of the Civil Rights Act of 1964, Section 100.6(d); Title IX of the Education Amendments of 1972, Section 106.9; and Section 504 of the Rehabilitation Act of 1973, Subsection 104.8)				

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The educational agency must provide continuing notice of their nondiscrimination policy for Title VI, Title IX, Section 504, and Title II. Such notification must: (a) Advise students, parents/guardians, employees, and the general public that they will not discriminate in its programs or activities; (b) Designate race, color, national origin, sex, and disability as bases of nondiscrimination; (c) Include the name or title, office address, telephone number and email of the Title IX, Section 504, and Title II coordinator(s); (d) Be disseminated on a continuing basis; (e) Be disseminated in documents such as: (Required: Student handbook, Parent/guardian handbook (secondary only), Employee handbook, Course catalogs (booklets), Program/employee application forms, Recruitment materials for students, Recruitment materials for employees, and in a medium to reach the general public such as: Newspapers/magazines, newsletters/memoranda, Bulletins/Postings, and other written communications). ]Open House Marketing nondiscrimination statement was missing the word 'sex'. The word 'sex' must be present in the nondiscrimination statement as that reflects legislative language under Title IX. Also the statement did not have email address for the contact.

Training Plan nondiscrimination statement under Exhibit L is missing the contact email. In addition, the last sentence of the nondiscrimination statement requiring a request to make reasonable accommodations for participation is not appropriate as reasonable accommodations are a given. Please strike this language.

Recommend a comprehensive review of all public facing documents.

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**E. ANNUAL PUBLIC NOTIFICATION OF CAREER AND TECHNICAL EDUCATION (CTE) OPPORTUNITIES**

Evidence provided demonstrates the educational agency provides annual public notification of nondiscrimination in CTE opportunities according to requirements of the Guidelines. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79 - Guideline IV(O))

**F. ADOPTION AND PUBLIC NOTIFICATION OF GRIEVANCE PROCEDURES**

Evidence provided demonstrates the educational agency has officially adopted and published grievance procedures for Title IX, Section 504, and Title II. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.8(b); Section 504 of the Rehabilitation Act of 1973, Subpart A, 104.7(b); and Title II of the Americans with Disabilities Act of 1990, Section 35.107(b))

**H. ASSISTANCE & ACCOMMODATIONS TO PERSONS WITH DISABILITIES**

Evidence provided demonstrates procedures are taken to ensure that students with disabilities are placed with regular education students to the maximum extent possible. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines, Sections IV(N) and VI(A); Section 504 of the Rehabilitation Act, Sections 104.32 and 104.33(a), (b); and Title II of the Americans with Disabilities Act of 1990, Subpart D, Section 35.130)

Evidence provided demonstrates that the educational agency annually undertakes procedures to identify persons with disabilities not receiving public education and provides notification to persons with disabilities and their parents/ guardians of its duty regarding nondiscrimination on the basis of disability. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines, Sections IV(N) and VI(A); Section 504 of the Rehabilitation Act, Sections 104.32 and 104.33(a), (b); and Title II of the Americans with Disabilities Act of 1990, Subpart D, Section 35.130)

Evidence provided demonstrates the educational agency has students with disabilities enrolled in regular CTE programs and has identified supplementary aids and support services used to enable students with disabilities to participate satisfactorily. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines, Sections IV(N) and VI(A); Section 504 of the Rehabilitation Act, Sections 104.32 and 104.33(a), (b); and Title II of the Americans with Disabilities Act of 1990, Subpart D, Section 35.130)

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**Evidence provided demonstrates the educational agency has taken steps necessary to modify instructional equipment, modify or adapt course offerings, and provide auxiliary or related aids or services when necessary. Services to students with disabilities are well organized and advertised. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines, Sections IV(N) and VI(A); Section 504 of the Rehabilitation Act, Sections 104.32 and 104.33 (a), (b); and Title II of the Americans with Disabilities Act of 1990, Subpart D, Section 35.130)**

**I. ASSISTANCE TO PERSONS WITH LIMITED ENGLISH PROFICIENCY AND/OR HEARING IMPAIRMENTS**

**(1) ELIGIBILITY OF PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP) SKILLS:** Evidence provided demonstrates the educational agency has acceptable procedures to identify LEP students and to assess the ability of LEP students to participate. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79, Guidelines Sections V(D), and IV(L))

**(2) COUNSELING LIMITED ENGLISH PROFICIENT (LEP) STUDENTS:** Evidence provided demonstrates the educational agency has taken steps to ensure that counselors can effectively communicate with LEP students. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79, Guidelines Sections V(D), and IV(L))

**(3) COUNSELING OF STUDENTS WITH HEARING IMPAIRMENTS:** Evidence provided demonstrates the educational agency has taken steps to ensure that counselors can effectively communicate with students and parents who have hearing impairments. No violation identified. (Federal Register Vol. 44, No. 56, 3/21/79, Guidelines Sections V(D), and IV(L))

**J. COUNSELING - RECIPIENT RESPONSIBILITIES: COUNSELING AND PROGRAM ENROLLMENT PROCEDURES**

**Evidence provided demonstrates program selection procedures are not considered discriminatory, and that all programs are equally available to all qualified students. No violation identified. (Title IX of the Education Amendments of 1972, 34 CFR, Sections 106.21(a) and (b), 106.36(a), (b), and (c) and 106.34; Section 504 of the Rehabilitation Act of 1973, Section 104.4, Subpart D, 104.34(a, c), Subpart D 104.37(b), Subpart E, 104.47(b) and 104.42(b)(4); Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines V(A), V(B), V(C), and V(E); and Title II of the Americans with Disabilities Act of 1990, 28 CFR 35.130(a))**

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Evidence provided demonstrates that career counseling activities are provided to all students without regard to race, color, national origin, sex or disability. Career Counseling activities are not considered discriminatory. No violation identified. (Title IX of the Education Amendments of 1972, 34 CFR, Sections 106.21(a) and (b), 106.36(a), (b), and (c) and 106.34; Section 504 of the Rehabilitation Act of 1973, Section 104.4, Subpart D, 104.34(a, c), Subpart D 104.37(b), Subpart E, 104.47(b) and 104.42(b)(4); Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines V(A),V(B), V(C), and V(E); and Title II of the Americans with Disabilities Act of 1990, 28 CFR 35.130(a))

Evidence provided demonstrates program applications and enrollment procedures and forms are not considered discriminatory. No violation identified. (Title IX of the Education Amendments of 1972, 34 CFR, Sections 106.21(a) and (b), 106.36(a), (b), and (c) and 106.34; Section 504 of the Rehabilitation Act of 1973, Section 104.4, Subpart D, 104.34(a, c), Subpart D 104.37(b), Subpart E, 104.47(b) and 104.42(b)(4); Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines V(A),V(B), V(C), and V(E); and Title II of the Americans with Disabilities Act of 1990, 28 CFR 35.130(a))

Evidence provided demonstrates the educational agency has taken steps to ensure that counseling materials do not discriminate on the basis of race, color, national origin, sex or disability. Evidence presented indicates that any disproportionate enrollments are not related to discriminatory career counseling activities or materials used by counselors. No violation identified. (Title IX of the Education Amendments of 1972, 34 CFR, Sections 106.21(a) and (b), 106.36(a), (b), and (c) and 106.34; Section 504 of the Rehabilitation Act of 1973, Section 104.4, Subpart D, 104.34(a, c), Subpart D 104.37(b), Subpart E, 104.47(b) and 104.42(b)(4); Federal Register Vol. 44, No. 56, 3/21/79 - Guidelines V(A),V(B), V(C), and V(E); and Title II of the Americans with Disabilities Act of 1990, 28 CFR 35.130(a))

**K. STRATEGIES TO INCREASE UNDER-REPRESENTED POPULATIONS**

**RECRUITMENT AND/OR PROMOTIONAL ACTIVITIES:** Evidence provided demonstrated the educational agency does not have a language minority population at this time. The education agency does not currently need to provide promotional literature in additional languages. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.23; Section 504 of the Rehabilitation Act of 1973, Section 104.8(b); Federal Register Vol. 44, No. 56, 3/21/79, Guideline V(A), V(E) and V(C))

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<b>RECRUITMENT AND/OR PROMOTIONAL ACTIVITIES:</b> Evidence provided demonstrates promotional efforts do not tend to perpetuate or create stereotypes or limitations based on race, color, national origin, sex, or disability. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.23; Section 504 of the Rehabilitation Act of 1973, Section 104.8(b); Federal Register Vol. 44, No. 56, 3/21/79, Guideline V(A), V(E) and V(C))				

<b>RECRUITMENT AND/OR PROMOTIONAL ACTIVITIES:</b> Evidence provided demonstrates students are recruited for CTE without regard to race, color, national origin, sex, or disability. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.23; Section 504 of the Rehabilitation Act of 1973, Section 104.8(b); Federal Register Vol. 44, No. 56, 3/21/79, Guideline V(A), V(E) and V(C))				

<b>RECRUITMENT AND/OR PROMOTIONAL ACTIVITIES:</b> Evidence provided demonstrates that personnel representative of the populations served carry out recruitment and counseling activities. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.23; Section 504 of the Rehabilitation Act of 1973, Section 104.8(b); Federal Register Vol. 44, No. 56, 3/21/79, Guideline V(A), V(E) and V(C))				

<b>RECRUITMENT AND/OR PROMOTIONAL ACTIVITIES:</b> Evidence provided demonstrates that promotional and recruitment materials do not exclude or limit the portrayal of career opportunities or otherwise discriminate on the basis of race, color, national origin, sex, or disability. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.23; Section 504 of the Rehabilitation Act of 1973, Section 104.8(b); Federal Register Vol. 44, No. 56, 3/21/79, Guideline V(A), V(E) and V(C))				

<b>RECRUITMENT AND/OR PROMOTIONAL ACTIVITIES:</b> Evidence provided demonstrates the educational agency makes provisions for persons with disabilities to receive promotional literature and comparable recruitment efforts in a medium in which they can communicate. No violation identified. (Title IX of the Education Amendments of 1972, Section 106.23; Section 504 of the Rehabilitation Act of 1973, Section 104.8(b); Federal Register Vol. 44, No. 56, 3/21/79, Guideline V(A), V(E) and V(C))				

<b>L. CO-OPERATIVE EDUCATION, JOB PLACEMENT, APPRENTICESHIP TRAINING, AND OTHER WORK-SITE BASED INFORMATION</b>				
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**Evidence provided demonstrates procedures and policies for participation in work-based learning/cooperative CTE programs contain an employer's assurance that students will not be discriminated against in these types of programs. No violation identified (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, VII(A) and (B)); Title IX of the Education Amendments of 1972, Section 106.38; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.37) (a, c); and Federal Register Vol. 44, No. 56, 3/21/79 - Guideline VII(A) and (B))**

**Evidence provided demonstrates that a statement of nondiscrimination is contained in application forms or written procedures for work-based learning/cooperative CTE programs. No violation identified. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, VII(A) and (B)); Title IX of the Education Amendments of 1972, Section 106.38; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.37) (a, c); and Federal Register Vol. 44, No. 56, 3/21/79 - Guideline VII(A) and (B))**

**Evidence provided demonstrates that written contracts and/or training agreements contain a statement of assurance indicating that students will be accepted and assigned to jobs and otherwise treated without regard to race, color, national origin, sex, or disability. No violation identified. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, VII(A) and (B)); Title IX of the Education Amendments of 1972, Section 106.38; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.37) (a, c); and Federal Register Vol. 44, No. 56, 3/21/79 - Guideline VII(A) and (B))**

Please see Exhibit D for changes to the nondiscrimination statement on the training agreement.

**Evidence provided demonstrates the educational agency does not discriminate in making cooperative CTE programs/work-site training available to all students. No violation identified. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, VII(A) and (B)); Title IX of the Education Amendments of 1972, Section 106.38; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.37) (a, c); and Federal Register Vol. 44, No. 56, 3/21/79 - Guideline VII(A) and (B))**

**M. ACCESSIBILITY**

**Comparable facilities (changing rooms, showers, etc.) are provided for students of both sexes. No violation identified. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, IV(D); Title IX of the Education Amendments of 1972, Section 106.33; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.34)(c); and Federal Register Vol. 44, No. 56, 3/21/79 Guidelines V(D))**

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**There are architectural barriers that deny mobility-impaired persons access to facilities that house CTE programs and courses. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, IV(D); Title IX of the Education Amendments of 1972, Section 106.33; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.34)(c); and Federal Register Vol. 44, No. 56, 3/21/79 Guidelines V(D)) - Ionia High School**

The educational agency must take steps to address the architectural barriers which deny or impede mobility-impaired persons access to facilities that house CTE students including, but not limited to, the following list of findings:

{ADAAG/ADA}

Accessible Route, Door, Hardware, Grasping: Door hardware was not operable with one hand and/or required tight grasping, pinching, or twisting of the wrist. {4.13.9}  
- Cafe'

Accessible Route, Doors, Interior, Opening Force: The 5 lbf. maximum force for pushing or pulling open an interior door was exceeded. {4.13.11}| Measured at 8 lbf. at the time of the review.  
- Cafe'

Accessible Route, Protruding Objects: Objects with leading edges more than 27 in. and not more than 80 in. above the finish floor or ground protrude more than 4 in. horizontally into the circulation path. Object is not 'cane detectable'{4.4}  
- Main entrance (Lifepak), Admin entrance (Lifepak)

Plumbing Elements, Lavatories and Sinks, Exposed Pipes and Surfaces: Hot water and/or drainpipes under sink not insulated or otherwise configured to protect against contact or risk of injury.



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- Health classroom (sink)

Universal Requirements, Reach Requirements, Height, Max:  
The highest operable part of controls, dispensers, receptacles, and other operable equipment exceeded maximum 48 in. from the finished surface with forward approach or more than 54 in. side approach. {4.2.5, 4.2.6, 4.27.3} | Current standard is 48" for both front and side approaches.

- Health classroom (paper towel), Welding (first aid kit), multiple locations (pencil sharpeners)

Recommendation(s)

- Add 'authorized personnel only' signage to stair ways or passages leading to mechanical/staff only spaces.  
- Provide for an adjustable desk in each instructional space.

**There are architectural barriers that deny mobility-impaired persons access to facilities that house CTE programs and courses. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, IV(D); Title IX of the Education Amendments of 1972, Section 106.33; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.34)(c); and Federal Register Vol. 44, No. 56, 3/21/79 Guidelines V(D)) - Ionia ISD {ADAAAG/ADA,2010 ADA}**

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The educational agency must take steps to address the architectural barriers which deny or impede mobility-impaired persons access to facilities that house CTE students including, but not limited to, the following list of findings:

{ADAAG/ADA}

Plumbing Elements, Bathroom, Water Closet, Toilet Seat Height: The seat height of a water closet was not within the required 17 in. min and 19 in. max measured from the finished floor to the top of the seat. {4.16}  
- Men's restroom, Women's restroom

Universal Requirements, Reach Requirements, Height, Max: The highest operable part of controls, dispensers, receptacles, and other operable equipment exceeded maximum 48 in. from the finished surface with forward approach or more than 54 in. side approach. {4.2.5, 4.2.6, 4.27.3}  
- Both entrances (coat rack)

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**There are architectural barriers that deny mobility-impaired persons access to facilities that house CTE programs and courses. (Title VI of the Civil Rights Act of 1964 (34 CFR, Part 100, Appendix B, IV(D); Title IX of the Education Amendments of 1972, Section 106.33; Section 504 of the Rehabilitation Act of 1973, Subpart D (104.34)(c); and Federal Register Vol. 44, No. 56, 3/21/79 Guidelines V(D)) - Parking {2010 ADA}**

The educational agency must take steps to address the architectural barriers which deny or impede mobility-impaired persons access to facilities that house CTE students including, but not limited to, the following list of findings:

Ionia High School

Accessible Space(s), Required Number, Car and Van: The minimum number of accessible spaces was not met {208.2}/{208.2.4}, {502.6}/ No accessible parking existed in the lot. The lot contains 67 spaces, which requires 3 accessible spaces with appropriate signage. In addition, 'Van Accessible' spaces are required for 1 for every 6, or fraction of 6, accessible spaces. Consequently, of the 3 required accessible spaces, 1 must be a 'van' space with appropriate signage.  
- Back lot

**OTHER**

**Data demonstrates that there is no significant difference in enrollment and completion between the overall educational agency's student population and the CTE student population based on race, disability, or gender . No violation identified.**

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***Certificate of Local Board or Board Authorized Official***

I HEREBY certify that the Civil Rights Compliance Plan for **Ionia ISD** *was adopted by the Ionia ISD Board of Education or Board Authorized Official on \_\_\_\_\_.*

*This Compliance Plan, as submitted, constitutes the basis for identifying, preventing, and remedying discrimination in education programs pursuant to 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, Title II of the Americans with Disabilities Act of 1990, and the Age Discrimination Act of 1975. All information and representations contained in this Plan are accurate and, to the best of my knowledge and belief, will be implemented within the established timelines.*

\_\_\_\_\_  
Date

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title