

**BOARD OF TRUSTEES  
AGENDA**

<input type="checkbox"/> WORKSHOP	<input checked="" type="checkbox"/> REGULAR	<input type="checkbox"/> SPECIAL
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(A)      XX☐      Report Only      ☐ Recognition

Presenter(s): Ana Laura Castillon, CTE Director  
Rolando Salinas, Deputy Superintendent for District Operations

Briefly describe the subject of the report or recognition presentation.

<b>Career &amp; Technical Education Methods of Administration (OCR) Onsite Visit Review</b>
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(B)      Action Item

Presenter(s):

Briefly describe the action required.

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(C)      Funding source: Identify the source of funds if any are required.

N/A
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(D)      Clarification: Explain any questions or issues that might be raised regarding this item.

<b>Memorial Junior High and Eagle Pass Junior High campuses were selected for review based on the agency's targeting plan, which requires a review of sub-recipients with the highest disparities between enrollment and CTE enrollment on the basis of race, sex, limited English, and disability. The USDE-Office of Civil Rights (OCR) approves the targeting plan prior to implementation every two years.</b>
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# Eagle Pass Independent School District Career and Technical Education

TO: Gilberto Gonzalez, Superintendent of Schools

FROM: Ana Laura Castellón, Career and Technical Education Director 

DATE: February 15, 2018


RE: Board Agenda Item- Methods of Administration /OCR Onsite Visit Review

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Attached is a Board Agenda Item that will be presented to the Board of Trustees at the March 2018 regular board meeting.

The audit findings will be presented as per the Texas Education Agency notification letter dated February 06, 2018.

Approved: \_\_\_\_\_

  
Samuel Mijares,

Deputy Superintendent for Curriculum & Instruction

# **EPISD CAREER & TECHNICAL EDUCATION PROGRAM COMPLIANCE REVIEW**

Ana Laura Castillón, CTE Director  
January 29 – February 2, 2018

United States Department of Education  
Office of Civil Rights (OCR) Methods of Administration  
(MOA)

Purpose of the on-site visit was to determine the school's compliance with the guidelines and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations which prohibits discrimination on the basis of race, color, and national origin.
- Title IX of the Education Amendments of 1972 and its implementing regulations which prohibit discrimination on the basis of sex.
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations which prohibits discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations which prohibits discrimination on the basis of disability.

## Memorial Junior High and Eagle Pass Junior High Identified Schools

- Review of 71 CTE Administrative/Program folders : Covered in 15 indicators
- Campus Interviews with Principals, Counselors & Teachers
- Interview with Program Directors & Deputy Superintendent for District Operations

### Methods of Administration Access to Career and Technical Education Program

1. Administrative
  - A. Annual Public Notification
  - B. Continuous Nondiscrimination Statement
  - C. Designation of Coordinators
  - D. Grievance/Complaint Procedures
2. Recruitment, Admissions, and Counseling
  - A. Recruitment and Counseling of Students
  - B. Admission Practices
  - C. Counseling of Students
3. Accessibility
  - A. Accessibility Issues
  - B. Equal Accessibility for Minority and Nonminority Communities
4. Comparable Facilities
5. Services for Students with Disabilities
  - A. Admission, Review, and Dismissal (ARD) Committee Membership
  - B. Related Aids and Services
  - C. Communication with Students with Visual, Auditory, and Speech Impairments
6. Financial Assistance N/A
7. Work-Based Learning, Cooperative Programs, and Job Placement N/A
8. Employment
  - A. Recruitment, Employment, and Promotional Practices
  - B. Salary Policies

## Program Review

### **Instructional Resources**

- Curriculum-class counts-teacher assignment
- Student demographics
- Student folders –CTE/SPED/LEP
- Program Requirements
- Course Selection Guide/Catalog
- CTE enrollment , student participation & disability codes

### **Facilities**

- Adequate –Size, Scope & Layout
- Male/Female comparable facilities
- Safety, Access issues, doors, steps, thresholds, handrails, sidewalks, handicap parking areas, and signage
- Appearance & cleanliness

## Nondiscrimination

- Statement located-website, student & employee handbook, course selection guide, CTE information & procedures manual.
- Annual Notification-Perkins-July-local newspaper and all EPISD/CTE documents .
- Grievance procedures (employee, students, parents)
- Barriers to enrollment (admission/application, master schedule)
- District salary schedule available –extra duty pay, stipends, extended contracts

## Factors for Success

- Teachers aware of the needs of students with disabilities
- Teachers aware of the needs of English language learners
- Collaboration of Program Directors
- Promotion of program such as Career Fairs, Career Days, Brochures, Program Information & Procedures Manual, Interest & Ability Inventories, and access to all students.
- Corrections to facilities made prior to the TEA/OCR Visit & Report (Internal audit conducted on October 26, 2017)

## Texas Education Agency Official Notification Letter

- Methods of Administration-Access to Career & Technical Education  
Executive Summary

### TEA Found the following:

No evidence on NonCompliance	15
<b><u>NonCompliance</u></b>	<b><u>0</u></b>
Not Applicable	2
Total Number if Indicators	17

**RECOMMENDATIONS** **0**



Texas Education Agency

Commissioner Mike Morath

1701 North Congress Avenue • Austin, Texas 78701-1494 • 512 463-9734 • 512 463-9838 FAX • [tea.texas.gov](http://tea.texas.gov)

**IMPORTANT  
MONITORING  
INFORMATION**

February 6, 2018

159-901  
2017-2018

***Sent Via Email***

[ggonzalez@eaglepassisd.net](mailto:ggonzalez@eaglepassisd.net)

Mr. Gilberto Gonzalez, Superintendent  
Eagle Pass Independent School District  
1420 Eidson Road  
Eagle Pass, TX 78852

Dear Mr. Gonzalez:

Thank you for taking the time to assist the Texas Education Agency (agency) during our on-site methods of administration (MOA) civil rights compliance review conducted on January 29 – February 2, 2018. As a recipient of federal financial assistance, Eagle Pass Independent School District (ISD) is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. According to the Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (34 C.F.R. Part 100, Appendix B) (Guidelines), each agency responsible for the administration of career and technical education (CTE) programs must conduct compliance reviews of sub-recipients (districts/charters) that receive federal financial assistance from the U.S. Department of Education (USDE) for CTE programs. The purpose of the on-site review was to determine the school's compliance with the Guidelines and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Memorial Junior High School and Eagle Pass Junior High campuses were selected for review based on the agency's targeting plan, which requires a review of sub-recipients with the highest disparities between enrollment and CTE enrollment on the basis of race, sex, limited English, and disability. Additionally, a criteria of the length of time since the last MOA review was applied (campuses visited in the last five years are not eligible for an on-site review). The USDE-Office of Civil Rights (OCR) approves the targeting plan prior to implementation every two years.

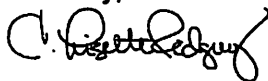
This letter of findings (LOF) summarizes the agency's findings in the following eight major areas of review in the attached *MOA Report*:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

All documentation has been reviewed by the agency and the Eagle Pass ISD is considered to have been in compliance during the on-site review. The determination of compliance for each indicator should not be construed to cover any other issues outside the scope of the CTE MOA findings or actions that may have occurred since the visit.

We wish to thank the district and campus administrators for the courtesy extended during the on-site review. If you have questions regarding this letter or the enclosed report, please contact Joe Ruiz in the TEA Division of School Improvement at (512) 463-5226 or by e-mail at [joe.ruiz@tea.texas.gov](mailto:joe.ruiz@tea.texas.gov). If you have additional questions regarding these interventions, please contact Gordon Franzen at [gordon.franzen@tea.texas.gov](mailto:gordon.franzen@tea.texas.gov). We appreciate your assistance in the implementation of the on-site review and your ongoing support of all students.

Sincerely,



C. Lizette Ridgeway  
Director, Division of School Improvement

CLR/sh

cc: Ana Castillon, CTE Contact, Eagle Pass Independent School District  
Jeff Lee Goldhorn, Executive Director, Region 20 Education Service Center (ESC)  
Ruthie Kneupper, CTE Contact, Region 20 ESC  
Joe Siedlecki, Associate Commissioner, System Support, TEA  
Diane Salazar, State Director for CTE, TEA  
Gordon Franzen, MOA Coordinator, TEA



<b>METHODS OF ADMINISTRATION (MOA)</b> <b>Access to Career and Technical Education Programs</b>
<b>Eagle Pass Independent School District</b>
<b>TEA Team Lead</b>
Joe Ruiz
<b>TEA Team Member</b>
Nancy Morales
<b>Facilities Visited</b>
Memorial Junior High School
Eagle Pass Junior High School
<b>Dates of MOA Visit</b>
January 29 - February 2, 2018
<b>Texas Education Agency</b> <b>Division of School Improvement</b> <b>1701 North Congress Avenue</b> <b>Austin, Texas 78701-1494</b> <b>(512) 463-5226</b>

**METHODS OF ADMINISTRATION**  
**Access to Career and Technology Education Programs**

**Executive Summary**

At the time of the onsite review, TEA found the following:

<b>No Evidence of NonCompliance</b>	<b>15</b>
<b>Noncompliance</b>	<b>0</b>
<b>Not Applicable</b>	<b>2</b>
<b>Total Number of Indicators</b>	<b>17</b>

<b>1. Administrative</b>	
A. Annual Public Notification	No Evidence of NonCompliance
B. Continuous Nondiscrimination Statement	No Evidence of NonCompliance
C. Designation of Coordinators	No Evidence of NonCompliance
D. Grievance/Complaint Procedures	No Evidence of NonCompliance
<b>2. Recruitment, Admissions, and Counseling</b>	
A. Recruitment and Counseling of Students	No Evidence of NonCompliance
B. Admission Practices	No Evidence of NonCompliance
C. Counseling of Students	No Evidence of NonCompliance
<b>3. Accessibility</b>	
A. Accessibility Issues	No Evidence of NonCompliance
<b>3. Accessibility</b>	
B. Equal Accessibility for Minority and Nonminority Communities	No Evidence of NonCompliance
<b>4. Comparable Facilities</b>	
A. Comparable Facilities	No Evidence of NonCompliance
<b>5. Services for Students with Disabilities</b>	
A. Admission, Review, and Dismissal (ARD) Committee Membership	No Evidence of NonCompliance
B. Related Aids and Services	No Evidence of NonCompliance
C. Communication with Students with Visual, Auditory, and Speech Impairments	No Evidence of NonCompliance
<b>6. Financial Assistance</b>	
A. Financial Assistance	Not Applicable
<b>7. Work-Based Learning, Cooperative Programs, and Job Placement</b>	
A. Career Preparation Education, Work Study, Apprenticeship and Job Placement	Not Applicable
<b>8. Employment</b>	
A. Recruitment, Employment, and Promotional Practices	No Evidence of NonCompliance
B. Salary Policies	No Evidence of NonCompliance

1. Administrative					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
<b>A. Annual Public Notification</b>			<b>Yes</b>	<b>No</b>	<b>No Evidence of NonCompliance</b>
Prior to the beginning of each school year, subrecipient (campus) must advise students, parents, employees and general public that all vocational (Career and Technical Education) opportunities will be offered regardless of race, color, national origin, sex or disability. Office for Civil Rights (OCR) Guidelines IV-0 28 Code of Federal Regulations (CFR) §35.106 34 CFR §100.6(d) 34 CFR §104.8 34 CFR §106.9	Evidence that the campus issues annual public notice of nondiscrimination	Local Newspaper	x		
	Evidence that the public notice is issued prior to the beginning of school	Campus/District Newspapers			
		Other publications			
	Evidence that the public notice is reaching the general public	Does notice have brief description of program offerings and admission criteria?	x		
		Do publications with notice reach students, parents, employees and applicants?	x		
		The notice is also disseminated in any language other than English as needed	Web site	x	
<p>Sample: (Public Notification of Nondiscrimination in Career and Technical Education Programs)</p> <p>(Campus) offers career and technical education programs in (types of programs offered). Admission to these programs is based on (admission standards).</p> <p>It is the policy of (campus) not to discriminate on the basis of race, color, national origin, sex or handicap in its vocational programs, services or activities as required by Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; and Section 504 of the Rehabilitation Act of 1973, as amended.</p> <p>It is the policy of (campus) not to discriminate on the basis of race, color, national origin, sex, handicap, or age in its employment practices as required by Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; the Age Discrimination Act of 1975, as amended; and Section 504 of the Rehabilitation Act of 1973, as amended.</p> <p>(Campus) will take steps to assure that lack of English language skills will not be a barrier to admission and participation in all educational and vocational programs.</p> <p>For information about your rights or grievance procedures, contact (NAME) the Title IX Coordinator, at (address of Title IX Coordinator), (phone number of Title IX Coordinator), and/or (NAME) of the Section 504 Coordinator, at (address of Section 504 Coordinator), (phone number of Section 504 Coordinator).</p>					

<b>1. Administrative</b>					
<b>Equity Requirement/ Legal Cites</b>	<b>Indicators Reviewed</b>	<b>Possible Documentation</b>	<b>Documentation Observed</b>		<b>Status</b>
<b>B. Continuous Nondiscrimination Statement</b>			<b>Yes</b>	<b>No</b>	<b>No Evidence of NonCompliance</b>
<p>A subrecipient (campus) must take continuous steps to notify participants, beneficiaries, applicants, parents, employees (including persons with visual or auditory impairments), other interested parties, and unions or professional organizations holding collective bargaining or professional agreements with the campus that it does not discriminate on the basis of race, color, national origin, sex, disability, or age. A statement of nondiscrimination shall be included on publications and other materials that are distributed to or accessible by students, parents, applicants, beneficiaries, employees, unions, or professional organizations holding collective bargaining or professional agreements with the district and other interested parties.</p> <p>Legal Authority: 28 CFR §35.106; 34 CFR §100.6(d), §104.8, §106.9, §110.25.</p>	<p>Evidence that the statement of nondiscrimination has required inclusions (race, color, national origin, sex, disability, and age)</p> <p>Evidence that if a campus' service area contains a community of national-origin minority persons with limited English language skills, the nondiscrimination statement is in the national-origin community's own language</p>	Student/parent publications	x		
		Applicant publications (statement includes age)			
		Employee publications (statement includes age)			
		District/Campus website	x		
		Electronic documents	x		
		Electronic recruiting materials	x		
		Newspaper			
		Newsletter	x		

<b>1. Administrative</b>					
<b>Equity Requirement/ Legal Cites</b>	<b>Indicators Reviewed</b>	<b>Possible Documentation</b>	<b>Documentation Observed</b>		<b>Status</b>
<b>C. Designation of Coordinators</b>			<b>Yes</b>	<b>No</b>	<b>No Evidence of NonCompliance</b>
<p>The subrecipient (campus) shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. The campus must notify students and employees of the name or title, office address, and contact information of the designated employee(s). This person(s) must be aware of his/her responsibilities and have the training necessary to perform the responsibilities.</p> <p>Legal Authority: 28 Code of Federal Regulations (CFR) §35.107(a); 34 CFR §104.7, §106.8, §110.25.</p>	<p>Evidence that the name or title, address, and contact information of the person(s) designated to coordinate Title IX and Section 504 compliance activities are included in the annual notice and other correspondence</p>	Annual public notification	x		
		Campus/District policy and procedures	x		
		Student/parent handbook, course catalogs	x		
	<p>Evidence that if a campus' service area contains a community of national-origin minority persons with limited English language skills, the nondiscrimination statement is in the national-origin community's own language</p>	Employee handbook, recruitment materials, or applications for employment	x		
		Title IX and Section 504 Coordinator interview(s)	x		
		Annual communications with employees	x		
		Electronic communications	x		
	<p>Evidence that the designated coordinator is aware of his/her responsibilities and received the training necessary to perform the responsibilities</p>				

<b>1. Administrative</b>					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
<b>D. Grievance/Complaint Procedures</b>			Yes	No	No Evidence of NonCompliance
<p>The subrecipient (campus) has adopted and distributed grievance procedures to resolve alleged discrimination complaints as required under Title IX and Section 504. Grievance procedures are available to any individual or class of individuals who feel they have been discriminated against. Grievance procedures for employees and students include a nondiscrimination statement based on race, color, national origin, sex, disability, and age. Legal Authority: 28 CFR §35.107(b); 34 CFR §104.7, §106.8, §110.25.</p> <p>The subrecipient (campus) has addressed formal complaints based on race, color, national origin, sex, disability, or age. Legal Authority: 34 CFR §100.7, §104.7, §106.8, §110.25(c).</p> <p>The subrecipient (campus) has adopted grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints. Legal Authority: 34 CFR §104.7 (b)</p>	<p>Evidence that the campus has published the board of trustees-adopted grievance procedures to ensure that all participants, students, beneficiaries, parents, and employees are informed about the grievance procedures for resolution of complaints and unlawful forms of discrimination based upon race, color, national origin, sex, disability, or age</p> <p>Evidence that the campus has on file the most recent board-approved policy regarding student and parent complaints/grievances (i.e., Texas Association of School Boards [TASB] policy FNG) and the most recent board-approved policy regarding employee complaint/grievances (i.e., TASB policy DGBA)</p> <p>Evidence that the campus has addressed formal complaints based on race, color, national origin, sex, disability, or age providing due process for resolution in a prompt and equitable manner</p>	Student handbook	x		
		Parent handbook	x		
		Employee handbook	x		
		Newspaper	x		
		Newsletters			
		Bulletins			
		Other publications			
		Memoranda			
		Campus/District websites	x		
		Local policy regarding student and parent complaints/grievances	x		
		Local policy regarding employee complaints/grievances	x		
		Electronic forms	x		
		Staff/administrator interview(s)	x		
		Review of any current grievance/complaint (2 years)	x		

2. Recruitment, Admissions, and Counseling					
Equity Requirement/ Legal Cites		Indicators Reviewed	Possible Documentation	Documentation Observed	
				Yes	No
A. Recruitment and Counseling of Students					
<p>Subrecipient (campus) must ensure that its 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 handicap</p> <p>Legal Authority OCR Guidelines V-A, V-C, and V-E; 34 CFR §104.37, §106.23.</p> <p>Recipients must conduct its student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap.</p> <p>Legal Authority OCR Guidelines V-C.</p> <p>Where recruitment activities involve the presentation or portrayal of vocational and career opportunities, the curricula and programs described should cover a broad range of occupational opportunities and not be limited on the basis of the race, color, national origin, sex, or handicap of the students or potential students to whom the presentation is made.</p> <p>Legal Authority OCR Guidelines V-C.</p> <p>Recruiting teams should include persons of different races, national origins, sexes, and handicaps.</p> <p>Legal Authority OCR Guidelines V-C.</p>	<p>Evidence that promotional and counseling activities and resources do not include materials that discriminate against or stereotype persons on the basis of race, language, color, national origin, sex, or disability</p> <p>Evidence that the curricula and programs described in course catalogs and student materials, such as brochures, pamphlets, posters, or memoranda cover a range of occupational opportunities and are not limited on the basis of the race, language, color, national origin, sex, or disability of the potential student</p> <p>Evidence that, to the extent possible, the district has conducted promotional activities that portray males or females, minorities, or persons with disabilities in programs and occupations in which these groups traditionally have not been represented</p> <p>Evidence that if a district's service area contains a community of national origin minority persons with limited English language skills, the promotional materials are in the national-origin community's own language</p>	<p>Electronic communication relating to CTE programs</p> <p>Copies of promotional materials (i.e., brochures, pamphlets, posters, bulletin boards, memoranda) used for career days, parents' night, laboratory demonstrations, visitation by groups of prospective students, and other activities</p> <p>Copies of promotional materials in the community's own language</p> <p>Nondiscriminatory promotional materials that encourage student participation in CTE student organizations without regard to race, color, national origin, sex, or disability</p> <p>The district can demonstrate that students with disabilities are provided equal opportunities to access CTE programs.</p>	<p>x</p> <p>x</p> <p>x</p> <p>x</p>		No Evidence of NonCompliance

2. Recruitment, Admissions, and Counseling					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
			Yes	No	
<b>B. Admission Practices</b>					<b>No Evidence of NonCompliance</b>
Recipients must implement a system of admissions that does not disproportionately exclude students on the basis of race, color, national origin, sex, or handicap. Legal Authority: OCR Guidelines IV-G.	Evidence that admissions procedure, policy, and/or practice for CTE program enrollment avoid criteria that disproportionately exclude persons of a particular race, color, national origin, sex, or disability	Admission policy for CTE programs along with description of admission process			
A subrecipient (campus) may not discriminate in its admission practices against persons on the basis of limited English language skills. Legal Authority: OCR Guidelines IV-L.	Evidence that the recipient (campus) reviews student enrollment in programs that traditionally have been selected predominantly by members of one race, national origin, or sex and actively recruits populations that are underrepresented in those programs	Procedures and criteria for selection/admission to the CTE program or courses of study where there are more applicants than can be accommodated			
A campus operating a secondary CTE program will identify applicants with limited English language skills and assess their ability to participate in CTE programs. Steps are taken to ensure that CTE programs are open to these students and that language support services are available (Reasonable Accommodation standard). Legal Authority: OCR Guidelines IV-L, 34 CFR §100.3.	Evidence that an individual graduation plan has been developed for each student with limited English language skills; and plans include a coherent sequence of CTE courses	Number of students by ethnicity, sex, limited English skills, and disability removed from CTE courses during the past three semesters	x		
Recipients may not judge candidates for admission to vocational education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or handicap. Examples of discriminatory admissions criteria that may be discriminatory: past academic performance, record of disciplinary infractions, counselors' approval, teachers' recommendations, interest inventories, high school diploma and standardized tests, such as the Test of Adult Basic Education (TABE). Legal Authority: OCR Guidelines IV-K.	Demographics of specific CTE programs are similar to demographics of entire CTE enrollment or district provides a legitimate nondiscriminatory rationale	Analysis of campus lists of all ELL/student population currently enrolled in CTE by program. Data should indicate that there is not a concentration of ELL(s) or other student population(s) in CTE programs	x		
	Demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students	If there is a concentration of ELL in one or more programs, there is evidence that it is not a result of discriminatory practices.			
	Evidence that criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable	Interviews	x		
		Policies	x		
		Procedures	x		
		Course catalogs	x		
		List of courses and their prerequisites	x		
		Teacher recommendation as a prerequisite for admission		x	
		Student handbook	x		
		ELL student folder review			
		PGP(s) for ELL students			
Introductory, preliminary, or exploratory courses are not established as a prerequisite for admission to a CTE program unless the course has been and is available to all students without regard to race, color, national origin, sex, or disability, and there is evidence that prerequisite courses essential to participation are clearly identified. Legal Authority: OCR Guidelines IV-K.	The district has a list of all courses and their prerequisites that are available without regard to race, color, national origin, sex, or disability and are based upon specific criteria  Evidence that all prerequisite courses are essential to participation in each program are identified.				



2. Recruitment, Admissions, and Counseling					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
C. Counseling of Students			Yes	No	No Evidence of NonCompliance
<p>Subrecipients (campus) that operate CTE programs 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 of success in any career or program based on the student's race, color, national origin, sex, or disability. Districts may not counsel students with disabilities toward more restrictive career objectives than students who do not have disabilities with similar abilities and interests. Legal Authority: OCR Guidelines V-B.</p> <p>Subrecipients (campus) must ensure that counselors can effectively communicate with national-origin minority students with limited English language skills and with students who have auditory impairments. This requirement may be satisfied by having interpreters available. Legal Authority: OCR Guidelines V-D.</p> <p>The subrecipient (campus) operating CTE programs ensures that students in protected groups do not drop out of CTE programs before completion due to unequal treatment or because of a lack of services to meet language - or disability-related needs. Legal Authority: 34 CFR §100.3, §100.4, §100.31.</p> <p>If a vocational program disproportionately enrolls male or female students, minority, nonminority students, or handicapped students, the district must demonstrate steps taken to ensure that the disproportion does not result from unlawful discrimination in counseling activities. Legal Authority: OCR Guidelines V-B.</p>	<p>Evidence that all students are counseled equally and equitably</p> <p>Evidence that students with disabilities are not counseled toward more restrictive career objectives than students who do not have disabilities with similar abilities and interest</p> <p>Evidence that the campus has taken steps to ensure counselors and other employees can effectively communicate with students who have auditory impairments</p> <p>Evidence that students in the protected classes are not withdrawn from CTE programs or CTE courses due to discriminatory practices</p>	Guidance plan, policy, and procedures			
		Assessment plan with list of tests administered			
		Written procedures for evaluation and placement of students with disabilities	x		
		Written plan for provision of services for individuals with auditory, mobility, and visual impairments			
		Evidence that the counseling process includes career options that are not limiting	x		
		List of role models or any other resources used in career counseling			
		Counselor interviews	x		
		Teacher interviews	x		
		Special programs/staff interviews	x		
		Student Interviews			

### 3. Accessibility

## A. Accessibility Issues

Campuses 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. A campus 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.

[illegible]

3. Accessibility					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
B. Equal Accessibility for Minority and Nonminority Communities			Yes	No	No Evidence of NonCompliance
<p>All CTE facilities housing programs are located at sites that are readily accessible to both minority and nonminority communities. facilities or programs are not identified as intended for nonminority or minority persons, and equal access is provided without regard to race, color, national origin, sex or disability.</p> <p>Legal Authority: OCR Guidelines IV-B and N; 34 CFR §100.3(b)(3), §104.4(vii)(5).</p>	<p>Evidence that the location and/or identification of the facilities do not tend to identify the facilities or programs as intended for minority or nonminority students.</p> <p>Evidence of equal access to the site location(s) of classes that are apart from the primary campus.</p> <p>Evidence that students with disabilities have available an instructional day commensurate with that of students without disabilities.</p> <p>Evidence that appropriate transportation is provided for students with disabilities.</p>	Interview with CTE staff	X		
		Interview with Special Education administrator	X		
		Interview with Special Education staff			
		Student schedule/ ARD if required			
		Bus schedule for special education/CTE students			
		Observation of facility	X		
		Facility Map	X		

4. Comparable Facilities					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
<b>A. Comparable Facilities</b>			Yes	No	No Evidence of NonCompliance
<p>The subrecipient (campus) provides changing rooms, showers, and other restroom facilities for CTE students of one sex that are comparable to those provided to students of the other gender. This may be accomplished by alternating the use of the same facilities or by providing separate, comparable facilities. Legal Authority: OCR Guidelines VI-D; 34 CFR §106.33.</p> <p>If separate programs or facilities exist for students with disabilities, they are comparable to those for students without disabilities. Legal Authority: Section 504: 34 CFR §104.34(c) Guidelines VI-A.</p> <p>Facilities must be adapted or modified to the extent necessary to make the vocational education program readily accessible to handicapped persons. Legal Authority: OCR Guidelines VI-D.</p>	Evidence that comparable facilities are provided in CTE classes where students change clothes or use protective clothing	Observation of facilities	x		
		Interview with the CTE program administrator	x		
		Interview with the Special Education program administrator	x		
		Teacher interview	x		

5. Services for Students with Disabilities					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
A. Admission, Review, and Dismissal (ARD) Committee Membership			Yes	No	No Evidence of NonCompliance
<p>When a student with a disability who qualifies for special education services is considered for placement in CTE courses, the ARD committee includes all required staff.</p> <p>Legal Authority: 34 CFR §104.4.</p>	<p>Evidence that the ARD committee discussed the option of CTE courses and career pathways.</p> <p>*ARD signature page *Discussion in ARD deliberations</p> <p>Evidence that transition services are discussed/developed for each student with a disability by transition coordinator for Special Education; including special education students in CTE and special education students not in CTE</p>	Sampling of student ARD folders - not in CTE program	x		
		Sampling of student ARD folders - in CTE program	x		
		Student interviews/student surveys			

5. Services for Students with Disabilities					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
B. Related Aids and Services			Yes	No	No Evidence of NonCompliance
<p>Access to CTE programs must be provided to persons with disabilities that need related aids or services in accordance with the students' individualized education programs (IEPs) and/or Section 504 accommodation plans. Legal Authority: OCR Guidelines IV-N; 28 CFR §35.130; 34 CFR §104.21, §104.22(b), §104.33.</p> <p>Subrecipient (campus) may not deny handicapped students access to vocational education programs or courses because of architectural or equipment barriers or because of the need for related aids and services or auxiliary aids. Legal Authority: OCR Guidelines IV-N.</p> <p>Subrecipient (campus) must adjust those requirements to the needs of individual handicapped students. Legal Authority: OCR Guidelines IV-N.</p> <p>Access to vocational programs or courses may not be denied to handicapped students on the ground that employment opportunities in any occupation or profession may be more limited for handicapped persons than for non-handicapped persons. Legal Authority: OCR Guidelines IV-N.</p>	<p>Evidence that the campus provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities</p> <p>Evidence that CTE programs are accessible to persons with disabilities</p> <p>Evidence that the campus has made provisions for the reassignment of classes or other services to accessible buildings</p>	Policy for providing aids and services			
		Procedures governing use of guide dogs, tape recorders, and note takers			
		Student IEPs/504 accommodation plans	x		
		Interviews with students or staff	x		
		On-site observations	x		
		Evidence of redesign of equipment			
		Evidence of assignment of aide to student(s)			
		Number of students with disabilities denied admission	x		
		Evidence of reassignment of classes or other services to accessible buildings			
		Proof of delivery of health, welfare, or other social services at alternative accessible sites			
		Sampling of student ARD folders - in CTE program	x		

5. Services for Students with Disabilities					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
C. Communication with Students with Visual, Auditory, and Speech Impairments			Yes	No	No Evidence of NonCompliance
<p>Subrecipient (campus) must ensure that students in a program who have visual, auditory, or speech impairments have the opportunity to receive and present communication in a manner that is appropriate and effective. In addition, the district ensures that counseling services are provided to such students.</p> <p>Legal Authority: OCR Guidelines V-A and D; 28 CFR §35.160.</p>	<p>Evidence that the campus has provided the appropriate auxiliary aids and services, including interpreters/translators where necessary, to afford an individual with a disability an equal opportunity to participate in and benefit from counseling, educational services, programs, and/or activities offered by the school</p>	Documentation of auxiliary aids and services provided by the district			
		Special education eligibility folders	x		
		Documentation of auxiliary aids or services provided by the district			
		List of equipment available for communication			
		List of qualified interpreters	x		
		Sampling of student ARD folders - in CTE program	x		

6. Financial Assistance					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
A. Financial Assistance			Yes	No	Not Applicable
Subrecipient (campus) may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education (CTE) students on the basis of race, color, national origin, sex, or disability, except to overcome the effects of past discrimination. Legal Authority: Guidelines VI - B.	Evidence that materials and information used to notify students of opportunities for financial assistance do not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis  Evidence that if a district's service area contains a community of national origin containing persons with limited English language skills, such information is disseminated to that community in its language	Scholarship offerings - CTE			
		Financial assistance catalogues			
		CTE related prizes			
		Compensation schedule for work-based program			



7. Work-Based Learning, Cooperative Programs, and Job Placement					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
A. Career Preparation Education, Work- Based Learning, Apprenticeship, Internships, Mentorships and Job Placement			Yes	No	Not Applicable
<p>The subrecipient (campus) makes opportunities available to students in work study (work-based learning), career preparation education, and job placement programs without regard to race, color, national origin, sex, or disability, and does not enter into any arrangement with an agency, union, business, or other sponsor that discriminates against the LEA's students 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, or pay. Legal Authority: OCR Guidelines VII; 34 CFR §100.3, §104.4, §106.31.</p> <p>A subrecipient (campus) 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 or pay. Legal Authority: Title VI: 34 CFR 100.3(b) Title IX: 34 CFR 106.38 Section 504: 34 CFR 104.46(b) Guidelines VII-A</p>	<p>Evidence that opportunities are available to students without regard to race, color, national origin, sex, or disability for any of the various types of programs</p>	Campus policies and procedures for work-based learning, career and technical education, internships, mentorships and job placement programs			
	<p>Evidence that the statement of nondiscrimination is contained in written procedures, application forms, contracts, training plans, agreements, and other documentation available to the students</p>	List of number of students in work-based learning, career and technical education, internships, mentorships, and job placement by race, color, national origin, sex, or disability			
	<p>Evidence that the students currently enrolled in the programs represent the overall makeup of the district based on race, color, national origin, sex, or disability</p>	Written agreements or forms used to assign students to work-based learning, career and technical education, internships, mentorships, and job placement programs [training plans/contracts]			
	<p>Evidence that the written agreements contain assurances that the agency, union, business, or other sponsor does not unlawfully 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, or pay</p>	Written agreements used with agencies, unions, businesses, or other training sponsors [training plans/contracts]			
		Documents used for the referral or assignment of students contain an assurance of nondiscrimination			
		Program descriptors			

8. Employment					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
A. Recruitment, Employment, and Promotional Practices			Yes	No	No Evidence of NonCompliance
<p>Subrecipient (campus) 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. Legal Authority: OCR Guidelines VIII-A.</p> <p>The subrecipient (campus) recruitment, employment, and promotional practices and procedures are free from discrimination against CTE employees or applicants on the basis of race, color, national origin, sex, disability, or age. Legal Authority: OCR Guidelines VIII-A and B; 34 CFR §110.25.</p> <p>Subrecipient (campus) must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question. Legal Authority: OCR Guidelines VIII-E.</p>	Evidence that the campus applications for employment do not contain prohibited preemployment lines of inquiry	Hardcopy - Application			
	Evidence that the campus policies and procedures for promotions, transfers, and contract extensions are nondiscriminatory	Online - Application	x		
	Evidence that the campus applications for employment contain appropriate notice of equal opportunity and the campus's nondiscrimination policy, including district contact information	Employment/promotion policy			
	Evidence that status reports or descriptions of employee recruitment activities include sources and contacts	CTE staff list by sex/race/disability	x		
	Evidence that qualified persons of the particular race, color, national origin, or sex; or qualified handicapped persons, are not in fact, available in the relevant labor market	CTE staff list by student population			
	Evidence that the recipient (campus) makes reasonable accommodation for the physical or mental limitations of handicapped applicants and/or employees	Documentation of recruitment activities - CTE			
		List of applicants by ethnicity, gender, and age that were not selected for employment	x		
		Staff interviews - CTE			
			x		

8. Employment					
Equity Requirement/ Legal Cites	Indicators Reviewed	Possible Documentation	Documentation Observed		Status
B. Salary Policies			Yes	No	No Evidence of NonCompliance
Subrecipient (campus) must establish and maintain faculty salary scales and policy based upon the conditions and responsibilities of employment, without regard to race, color, national origin, sex or handicap. Legal Authority: OCR Guidelines VIII-D; 34 CFR §100.3, §104.11, §106.54, §110.25.	Evidence that the salary scales and policies are based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex, disability, or age  Evidence that faculty assignment patterns and job descriptions are not discriminatory on the basis of race, color, national origin, sex, disability, or age	Faculty salary schedules - CTE	x		
		Copy of job descriptions - CTE	x		
		Stipend salary schedule - CTE	x		
		Calendar with contracted days - CTE	x		
		Teacher/staff interviews - CTE	x		