



Methods of Administration (MOA) for Office for Civil Rights (OCR) Compliance Reviews

Program Manager

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Dr. John D. Barge, State School Superintendent
"Making Education Work for All Georgians"

Targeted schools:



Questions regarding the selection of schools/systems, please contact Ray Anukam at ranukam@doe.k12.ga.us .

2014-2015 Systems

1. August 20 - Bremen City Schools
2. August 26 - Union County Schools
3. August 27 - Banks County Schools
4. September 2 - Glascock County Schools
5. September 3 - Richmond County C



The Mission



...of the U.S. Department of Education
Methods of Administration (MOA) is to ensure
equal access to education and to promote
education excellence throughout the nation
through vigorous enforcement of civil rights.



Dr. John D. Barge, State School Superintendent
"Making Education Work for All Georgians"

Goal:

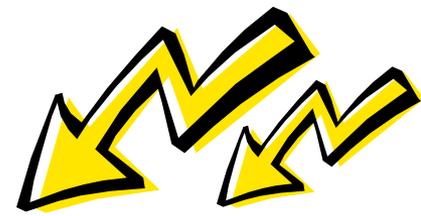


Participants from targeted school will have a better understanding of the Methods of Administration which ensures the equitable distribution of federal vocational education funds and encourages high-quality Career, Technical and Agricultural programs.



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Objectives:



- To review the legislation
- To review the procedure for targeting
- To review the areas of investigation and suggested documentation for evidence
- To review the procedure and processes



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More Accountability = Greater Credibility



- **Perkins Compliance Review**

- Required by Perkins
- Conducted with 1/5 of systems per year
- Serves as mechanism for evaluation both internally and externally
- Provides professional learning for team members

- **MOA Compliance Review**

- Required by Office for Civil Rights
- Conducted in 5 systems per year targeted from the 1/5 systems
- Serves as a mechanism for evaluation both internally and externally
- Provides professional learning for team members



Legislation & Resources:



✓ The Civil Rights Act of 1964, Title VI: "race, color or national origin" <http://www.ed.gov/policy/rights/reg/ocr/edlite-34cfr100.html>

✓ The Rehabilitation Act of 1973, Section 504: "disability/program and activities" <http://www.ed.gov/policy/rights/reg/ocr/edlite-34cfr104.html>

✓ The Education Amendments of 1972, Title IX: "gender" <http://www.ed.gov/policy/rights/reg/ocr/edlite-34cfr106.html> (update)

✓ The Americans with Disabilities Education Act of 1990, Title II "disability/state and local" <http://www.ed.gov/policy/rights/reg/ocr/edlite-28cfr35.html>

✓ *Vocational Education Program Guidelines* <http://www.ed.gov/about/offices/list/ocr/docs/vocre.html>



Special Populations



- Students w/ Disabilities
- Students w/ Limited-English Proficiency
- Displaced homemakers
- Individuals from Economically disadvantaged families
- Individuals preparing for non-traditional (fields) training & employment
- Economically disadvantaged students, including foster children
- Single parents & single pregnant women
- Individuals with other barriers to educational achievement
- Individuals in state institutions



Process:



- ✓ *Superintendent receives MOA letter*
- ✓ *MOA Workshop for "targeted" systems*
- ✓ *Collect evidence and documentation for all required areas*
- ✓ *Organize into notebook*
- ✓ *Submit electronic requested information*
- ✓ *OCR Team Visit*
- ✓ *Interviews: Parents, students, instructors, 504 coordinator, Title IX coordinator, Exceptional Children's coordinator, administration and counselors probing questions to verify compliance.*



5k

Process con't...



- ✓ *Walk through of the facilities including building entrances, CTAE lab areas including greenhouse, common areas like cafeteria, and shower and dressing room facilities to determine accessibility and equality*
- ✓ *Review documents requested as evidence to verify compliance; organized in folders by areas of investigation (combine work study and apprenticeship)*
- ✓ *Brief exit report of any major finding(s)*
- ✓ *Written report (letter of finding(s) -LOF) sent to the Superintendent within 6 weeks after the visit*
- ✓ *System is responsible for a voluntary compliance plan (VCP) within 4 weeks of receiving the letter of finding(s)*



Process con't...

- ✓ *State recipient must submit a biennial report of all review findings and voluntary compliance plans*
- ✓ *System is responsible for a voluntary compliance plan (VCP) within 4 weeks of receiving the letter of finding(s)*
- ✓ *State recipient must submit a biennial report of all review findings and voluntary compliance plans*

Areas of Investigation:



A. Administrative compliance:

- ⇒ Continuous nondiscrimination notification
- ⇒ Person responsible for coordinating Title IX, Section 504
- ⇒ Annual school public notification
- ⇒ Grievance procedure

DOCUMENTS REQUESTED:

- 📍 Copy of public notice
- 📍 4 examples of continuous notice
- 📍 Identify compliance officer(s)
- 📍 Board policies regarding nondiscrimination
- 📍 Copy of *Grievance Policy and Complaint Procedures*



LAMAR COUNTY
FY13 GEORGIA OCR COMPLIANCE REVIEW
Section 1 - Administrative Compliance

Recipients need to have certain basic requirements in place to comply with the OCR Guidelines, Title II, Title VI, Title IX, and section 504. These basic procedures include an annual public school notice, continuous notification, designation of a person(s) to coordinate activities under Title II, Title IX, and Section 504 and a grievance procedure that will allow students, parents and employees at the elementary and secondary level an avenue through which to report and manage alleged discrimination. The district must provide adequate evidence that it takes continuing steps to notify participants, beneficiaries, applicants, elementary and secondary school parents, employees (including those with impaired vision or hearing), and unions or all appropriate professional organizations that it does not discriminate on the basis of race, color, national origin, sex or disability.

1. Continuous Nondiscrimination Notice (Title IX; 34 CFR 106.9, Section 504: 34 CFR 104.7(a))

Required Evidence or Documentation

Answer Yes or No

1. The district has and uses a Nondiscrimination Notice. Yes No

2. The following groups (race, color, national origin, sex or disability) are included in the notice. Yes No

3. Attach a scanned copy of the system nondiscrimination statement as shown in the following documents. Make sure the source and page number are indicated for each scan.

- BOE Manual - see attached copy of system BOE Policy web page;
- System Website - see attached copy of System web page
- School(s) Website(s) - see attached copy of LCHS web page
- Student Handbook - see attached copy of Student Handbook, page 7
- Teacher Handbook - see attached copy of Teacher Handbook, page 6
- Parent Handbook - see attached copy of LCS Code of Conduct & Student/Parent Handbook, pages 24 & 42
- Other system documents- see attached copy of Employee Handbook, page 5; LCS Letterhead; SNP Application; LCHS School Profile; LCHS Course Description Guide, page 2

2. Persons Responsible for Coordinating Title IX and Section 504 (Title IX: 34 CFR 106.8, Section 504:34 CFR 104.7(a))

a) Name and contact information of each employee of the district designated to

NONDISCRIMINATION STATEMENT Appendix E

Summer in the Sticks 1B

The Herald Gazette

BARNESVILLE.COM
Your Source For Breaking News

Tuesday, July 23, 2013 Barnesville, GA 30204 75 cents

Section 1 - 3.b. - Annual Public Notification
Newspaper—July 23, 2013 page 7B

gpe14
Public Notice, Lamar
County Board of Educa-
The Lamar County
system offers the follo
career and technical
tion programs.
regional
national
those with an
proficiency, see
in grades 9-12.
Business Education
Healthcare Science
Construction
JROTC
Education Training
Persons seeking
information concerning the
career and technical educa-
tion offerings and specific
pre-requisite criteria should
contact:
Mrs. Tracy Scaisons, Chi-
eer Technical Administra-
1 Trojan Way, Barnesville,
30204, 770-558-9541, tsc
son@lamar.k12.ga.us
Inquiries regarding discri-
mination policies should
be directed to:
Mr. Clive Hendrix
Deputy Superintendent
100 Victory Lane
Barnesville, GA 30204
770-558-5891
chhendrix@lamar.k12.ga.us
(723)(0)(b)(5)(a)(iii)

THE HERALD GAZETTE 7B

PUBLIC NOTICE
MISC.

THURSDAY, JULY 23, 2013

Copy of Non-Discrimination
Statement in local newspaper prior to
the 1st day of school

CONTINUOUS NONDISCRIMINATION STATEMENTS Appendix F

Section 1 - 1.C - Continuous Nondiscrimination Notice
LCHS Web Page

<http://www.lamar.k12.ga.us/DivisionID=11107&DepartmentID=14544>

Lamar County School District
100 VICTORY LN, BARNESVILLE, GA 30104 PHONE: 706.339.2300

Lamar County High School
101 TRUMAN WAY, BARNESVILLE, GA 30104 PHONE: 706.339.2300

EVERY KID, EVERY CHANCE, EVERY DAY

Translate With Google Translate

Latest News
Webcam: Dick, Richard

Spotlight
ADDRESS TO WHOLE THE LAMAR COUNTY COMMUNITY

Lamar County Schools
100 VICTORY LANE, BARNESVILLE, GA 30104

World Class Teachers for World Class Students

Nondiscrimination Statement

The Lamar County School District does not discriminate on the basis of race, color, national origin, sex, disability, or age in its policies and activities and provides equal access to its facilities and other designated areas. The following personnel have been designated to handle inquiries regarding the nondiscrimination policies:

Superintendent	Dr. John G. Smith, District Superintendent
Assistant Superintendent	Mr. Tommie L. Smith, Assistant Superintendent
Director of Student Services	Mr. Tommie L. Smith, Assistant Superintendent
Director of Instruction	Mr. Tommie L. Smith, Assistant Superintendent
Director of Technology	Mr. Tommie L. Smith, Assistant Superintendent
Director of Transportation	Mr. Tommie L. Smith, Assistant Superintendent
Director of Facilities	Mr. Tommie L. Smith, Assistant Superintendent
Director of Community Relations	Mr. Tommie L. Smith, Assistant Superintendent
Director of Student Services	Mr. Tommie L. Smith, Assistant Superintendent
Director of Learning and Leadership	Mr. Tommie L. Smith, Assistant Superintendent
Director of Technology	Mr. Tommie L. Smith, Assistant Superintendent
Director of Transportation	Mr. Tommie L. Smith, Assistant Superintendent
Director of Facilities	Mr. Tommie L. Smith, Assistant Superintendent
Director of Community Relations	Mr. Tommie L. Smith, Assistant Superintendent

The Lamar County School District offers the following career and technical education programs to all students regardless of race, color, national origin, sex, disability, or age in its policies and activities and provides equal access to its facilities and other designated areas. The following personnel have been designated to handle inquiries regarding the nondiscrimination policies:

Director of Career and Technical Education	Mr. Tommie L. Smith, Assistant Superintendent
Director of Career and Technical Education	Mr. Tommie L. Smith, Assistant Superintendent
Director of Career and Technical Education	Mr. Tommie L. Smith, Assistant Superintendent
Director of Career and Technical Education	Mr. Tommie L. Smith, Assistant Superintendent
Director of Career and Technical Education	Mr. Tommie L. Smith, Assistant Superintendent

Lamar County School System Board of Education an Equal Opportunity Employer

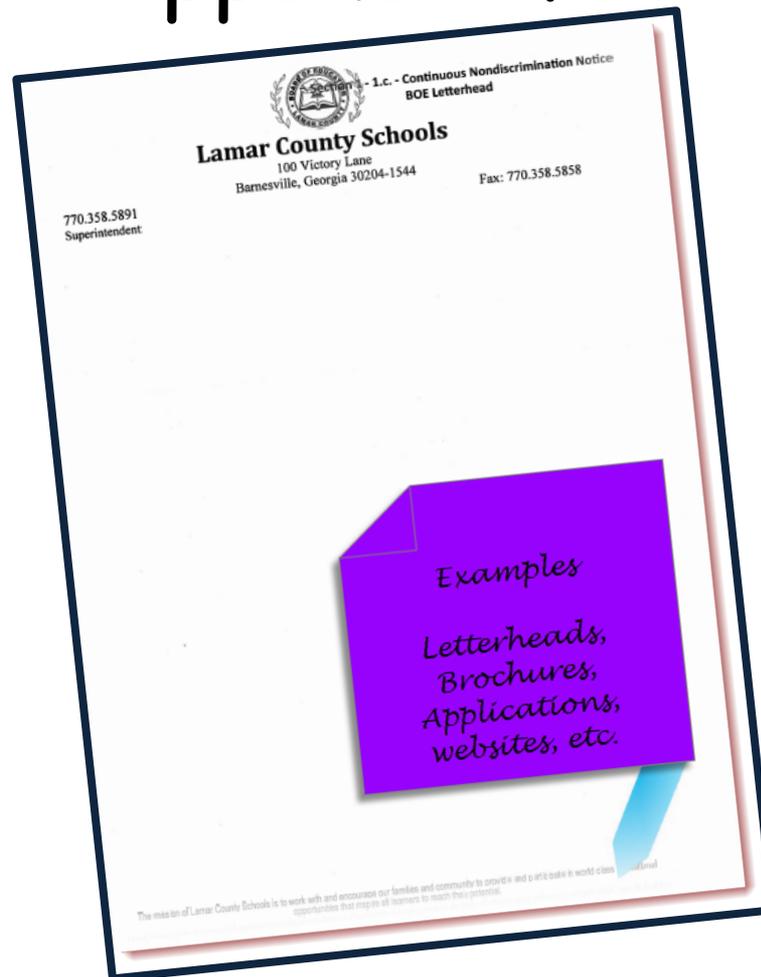
Parental Grievances
Student Grievances
Student Grievance / Administration

Minimum of four EXAMPLES

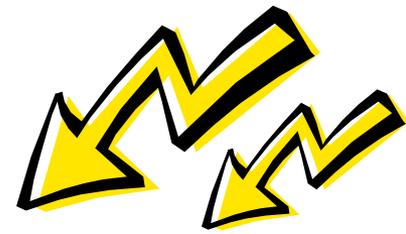
Teacher Resources
Lamar County School District
Nondiscrimination Statement
BOE Policies

School Sites

CONTINUOUS NONDISCRIMINATION STATEMENTS Appendix F



Areas of Investigation:



B. Site location and student eligibility compliance:

- ⇒ Enrollment criteria
- ⇒ Enrollment data by gender, LEP and SWD
- ⇒ Site selection and modifications
- ⇒ Residency requirements

DOCUMENTS REQUESTED:

- 📍 Provide a map of the attendance zone, only for systems with multiple attendance zones
- 📍 Admission requirements
- 📍 Map of facilities with construction dates and CTAE Labs highlighted
- 📍 Demographics Form



LAMAR COUNTY
FY13 GEORGIA OCR COMPLIANCE REVIEW
Section 2 - Site Location and Student Eligibility

Standards established for 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 career and technical education facilities, geographic placement requirements, numerical limits for students from schools of origin, and admission eligibility criteria and technical education facilities, and any other criteria that could result in discrimination or segregation disproportionately excluding students of a particular race, color, national origin, sex or disability.

List the Documentation Being Provided in Color Ink

1. Student Eligibility (Guidelines IV-A)

a) Identify the BOE policy number and the admission eligibility criteria as shown in the following documents.

JBC & JBC(1)

- BOE Policy Manual - see attached copy of BOE Policy JBC & JBC(1)
- Student Handbook - see attached copy of page 20 from student handbook
- Teachers/Staff Handbook - see attached copy of page 74 from teacher handbook
- System and/or School Websites - see attached system and LCHS web page
- Others - see attached LCHS Course Description Guide, page 2

Make sure the source and page number are indicated for each.

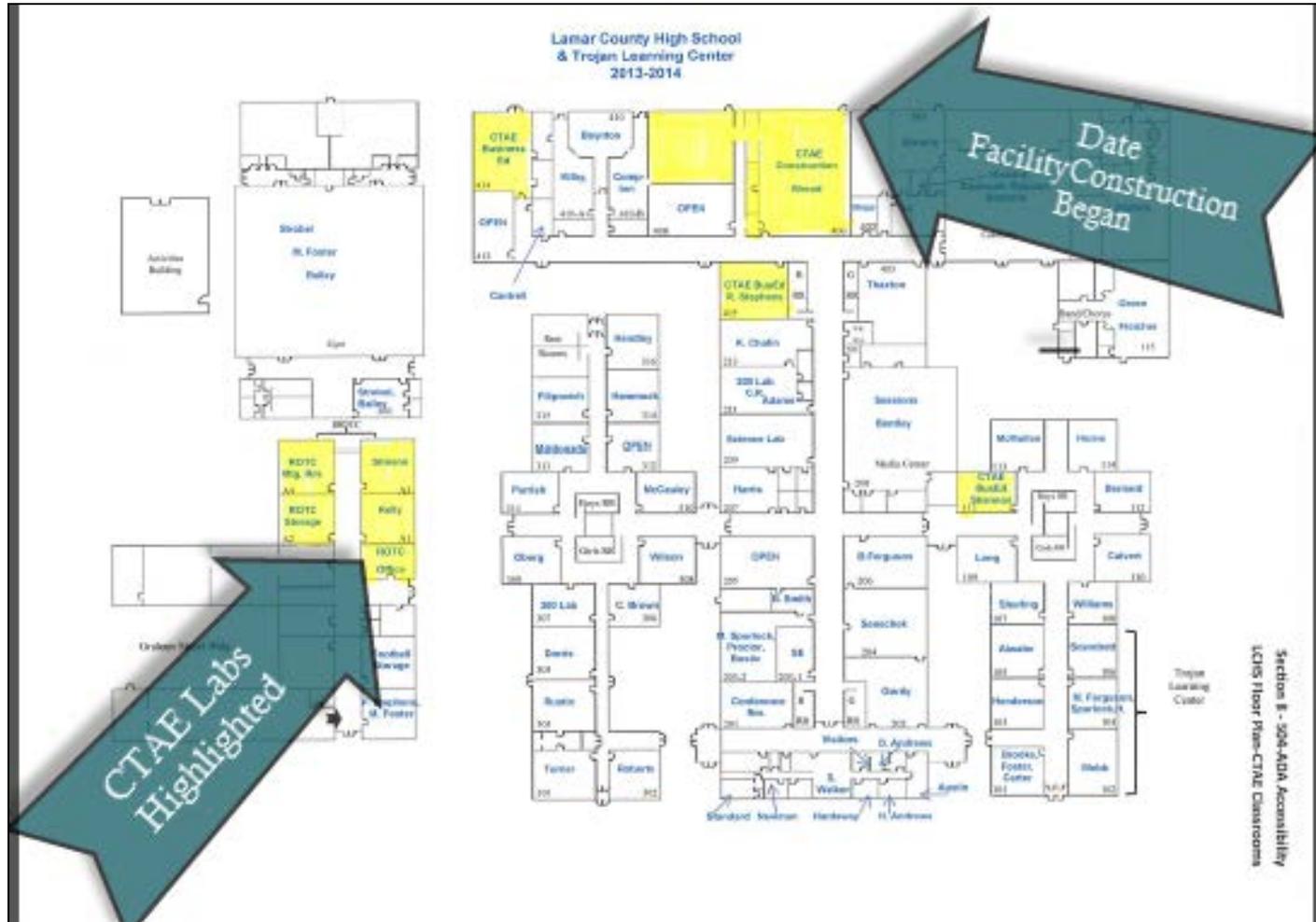
2. Site Selection and Modifications (Guidelines IV-B, Guidelines IV-D)

District policies procedures and outcomes ensure that additions, modifications, or renovations to the physical plan of any school facility do not create, maintain, or increase segregation on the basis of race, color, national origin, sex or disability.

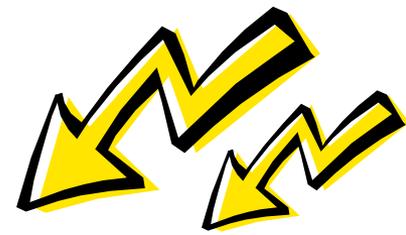
a) Does the district have policies and procedures to ensure that additions, modifications, or renovations to the physical plan of any school facility do not create, maintain, or increase segregation on the basis of race, color, national origin, sex or disability?

Yes X No

FACILITY DIAGRAMS



Areas of Investigation:



C. Recruitment compliance (students and employees):

- ⇒ Recruitment activities
- ⇒ Recruitment materials
- ⇒ Counselor communication
- ⇒ Promotional efforts-school wide and middle school
- ⇒ LEP materials, if appropriate

DOCUMENTS REQUESTED:

- 📍 Provide evidence of recruitment activities and the CTAE area recruiting materials, brochures, flyers, videos, power points and any other materials used in the promotion of CTAE and nontraditional opportunities.
- 📍 Provide data showing the enrollment trends regarding males/females, black/white, disable and LEP
- 📍 Provide evidence of employment recruitment activities.



Section 5 - 1.b. Availability to All Students
Procedures for Financial Assistance

Scholarship information is an ongoing activity in the guidance office. Counselors discuss scholarship and grants with students individually, during grade-level assemblies or presentations, as well as maintaining a file drawer with scholarship and grant information received. Parent Night activities include a GSFC representative delivering HOPE opportunities and eligibility information, and a computer lab staffed with guidance personnel for students/parents to complete FAFSA, college or other applications. There is also information on the Guidance web page.

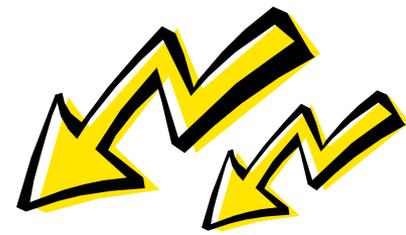
Through the Teachers-As-Advisors (TAA) program, students are made aware of scholarships and grant opportunities, including the various College Credit Now dual enrollment programs. Students are also urged to participate in activities throughout high school that will increase their eligibility and opportunity for receiving scholarships. The school sponsors several projects such as "Pay it Forward", Operation Christmas Child, and groups for the community-sponsored "Great Day of Service".

extra-curricular activity such as Literary and an athletic team. During GA411 lab time during TAA, students can search for grants as they update their graduation plan.



Provide Narrative
Explanations Where
Necessary

Areas of Investigation:



D. Admissions compliance

- ⇒ Counselor communication
- ⇒ Promotional efforts-school wide and middle school
- ⇒ LEP

DOCUMENTS REQUESTED:

- 📍 Provide a copy of the course description booklet if one is available
- 📍 Provide a copy of the master schedule
- 📍 Provide documentation of any language related support services provided LEP including information translated into the native language
- 📍 Provide copies of the process and materials used to identify handicapped/special needs students and LEP students.
- 📍 Identify the supplementary aids and services provided to students with disabilities.
- 📍 Provide a copy of demographic data form



ADMISSION REQUIREMENTS

General Information

▶ Eligibility
All 11th and 12th grade students who are on track for graduation, are a minimum of 16 years of age, and meet the program requirements may enroll in the Work-Based Learning Program.

▶ Requirements for Admission

- ▶ A defined career goal
- ▶ Enrollment in or completion of a course in Career, Technical and Agricultural Education (CTAE) that is related to the student's career goal and job placement.
- ▶ Good attendance and discipline record
- ▶ Recommendations from other teachers
- ▶ Reliable transportation and proof of insurance

Consult your system or school coordinator for additional requirements.

▶ Employer Responsibilities

- ▶ Provide a mentor for the student
- ▶ Adhere to a Training Agreement and follow a defined Training Plan
- ▶ Adhere to State and Federal laws and guidelines for student workers
- ▶ Evaluate student performance

Student Classifications

Students in Work-Based Learning are classified in one of four ways according to the alignment of their career-tech coursework with job placement and future postsecondary/career plans:

- ▶ Youth Apprenticeship (YAP)
- ▶ Internship
- ▶ Cooperative Education (Co-op)
- ▶ Employability Skills Development (ESD)

Student placement is dependent on defined criteria for each placement type including the paid or unpaid status.

For more information on how to become involved in the Work-Based Learning Program in your community, contact:

Donna Andrews, YAP/WBL Coordinator
Lamar County College & Career Academy

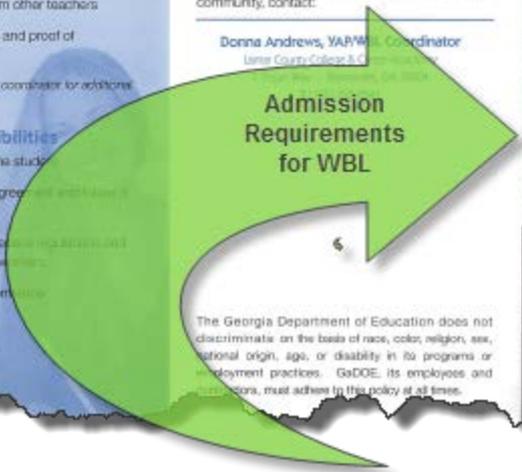
WORK-BASED LEARNING PROGRAM

Career-Related Education for Tomorrow's Workforce



LAMAR COUNTY COLLEGE & CAREER ACADEMY

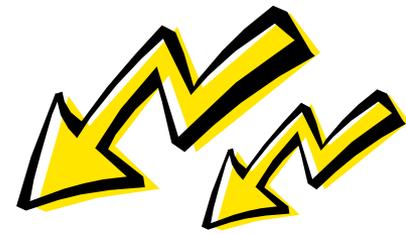




Admission Requirements for WBL

The Georgia Department of Education does not discriminate on the basis of race, color, religion, sex, national origin, age, or disability in its programs or employment practices. GaDOE, its employees and contractors, must adhere to this policy at all times.

Areas of Investigation:



E. Students financial assistance compliance:

⇒ Notification to outside agencies that the system does not discriminate.

⇒ Communication with LEP; hearing impaired; seeing impaired.

⇒ Implement a review process to ensure nondiscrimination

DOCUMENTS REQUESTED:

📍 Provide a list of financial aid award for the prior year indicate male/female, black/white recipients.

📍 Provide copies of financial assistance to students with limited English speaking ability in their native language.

NOTE: Limited English Proficient (LEP) students and parents--A "community" will constitute more than 5% of the total school population.



SCHOLARSHIP & FINANCIAL AID PROCEDURES

Section 5 - 1.b. - Availability to All Students
Procedures for Financial Assistance

Narrative of Scholarship Procedures

Scholarship information is available in the guidance office. Counselors discuss scholarship and grants with students individually, during grade-level assemblies or presentations, Parent Night activities, as well as maintaining a file drawer with scholarship and grant information received.

Through the Teachers-As-Advisors (TAA) program, students are made aware of scholarships and grant opportunities, including the various College Credit Now dual enrollment programs. Students are also urged to participate in activities throughout high school that will increase their eligibility and/or opportunity for receiving scholarships. The school sponsors several community projects such as "Shop with a Trojan", "Operation Christmas Child" and several groups for the community "Great Day of Service" project. Joining a club or extra-curricular activity such as Literary and an athletic team is also encouraged. During GA411 lab time during TAA, students can search for scholarships and grants as they update their graduation plan.

Early in the second semester, guidance will send a letter to community scholarship sponsors requesting their current application and qualifications. The date, time and location of the Honors Program are provided as well as deadline dates for providing the guidance department with the applications and notifying who was awarded. They are invited to send a representative to present their organization's scholarship and are reminded that the school system does not discriminate with the inclusion of the nondiscrimination statement.

Sample
Scholarships

Areas of Investigation:



F. Counseling issues compliance:

- ⇒ Counseling materials and activities
- ⇒ Course and program selection process
- ⇒ Students with disabilities placement and program selection process
- ⇒ Disproportionate enrollments



DOCUMENTS REQUESTED:

- 📍 Provide copies of all career assessments used with students and timeline for their administration.
- 📍 Provide copies of career-related brochures, newsletters, flyers from the counseling department, scholarship notifications, power points etc.
- 📍 Provide labor market information shared with all students.
- 📍 Provide strategies used to eliminate stereotyping and gender-bias attitudes and behaviors related to class selection.

Areas of Investigation:



G. Services for students with disabilities compliance:

- ⇒ Non Discrimination for Students with Disabilities
- ⇒ Provision of Elementary and Secondary 504 Services
- ⇒ Supplementary Aids, Services and Support
- ⇒ Free and Appropriate Education (FAPE) - Career and Technical Education



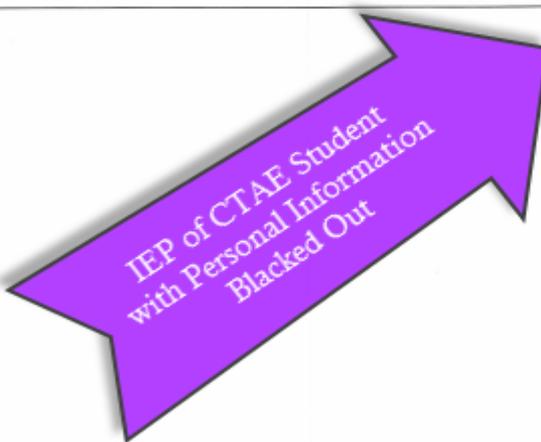
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DOCUMENTS REQUESTED:

- 📍 Provide a list of supplementary aids and services available to disabled persons when needed.
- 📍 Documentation ensuring procedural safeguards through which parents or guardians can obtain an impartial review of the evaluation and placement actions of students with disabilities.
- 📍 Documentation to ensure the system has a procedure in place for the identification and placement of disabled persons in CTAE programs including WBL.
- 📍 Provide demographic data form

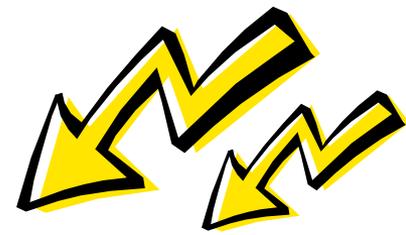
SERVICES TO STUDENTS WITH DISABILITIES

INDIVIDUALIZED EDUCATION PROGRAM (IEP)		LAT	Section 7 - 2.d. Provision of 504 Services
Student Name: [REDACTED]		IEP of CTAE Student	
IEP Dates: from 3/30/2013 to 3/28/2014			
I. INDIVIDUALIZED EDUCATION PROGRAM (IEP)			
IEP Meeting Date: 3/29/2013		Case Manager: Raybould, Vanna	
Purpose of IEP Meeting: Annual review of a current IEP and develop a new IEP, if appropriate			
Discuss parental concerns			
Student Name: [REDACTED]	Date of Birth: [REDACTED]	GTID#: [REDACTED]	
Eligibility Category(s): SPECIFIC LEARNING DISABILITY,			
School: Lamar County Comprehensive High School	Grade: 10	School Year: 2013	
Most Recent Eligibility Dates: 3/29/2013	IEP Implementation Date: 3/30/2013	IEP Ending Date: 3/28/2014	
Parent(s):			
Parent: [REDACTED]			
Address: [REDACTED]		Email: [REDACTED]	
Phone(Home):	Work:	Cell Phone: [REDACTED]	



IEP of CTAE Student
with Personal Information
Blacked Out

Areas of Investigation:



H. 504/ADA accessibility compliance:

- *Existing Facilities/Section 504- construction or alteration initiated before 6/4/77 - "readily accessible";
- *New Construction/Section 504- construction or alteration initiated between 6/4/77 and 1/17/91 - ANSI A117.1-1961 (R1971);
- New Construction/Section 504- construction or alteration initiated between 1/18/91 and 1/26/92- UFAS;
- New Construction/ADA- construction after 1/27/92 (ADAAG or UFAS)

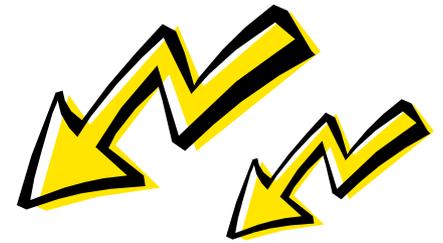
DOCUMENTS REQUESTED:

📍 Provide the checklist for common accessibility issues.

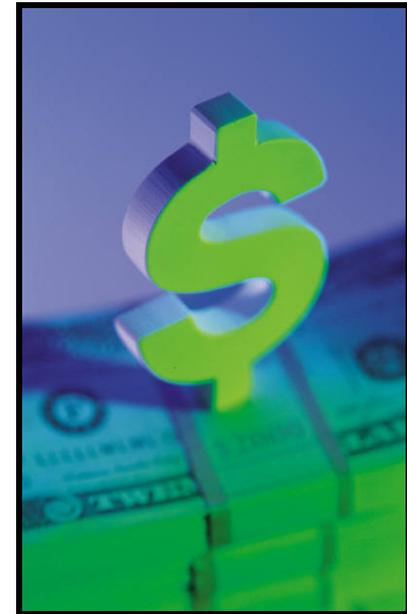
NOTE: Existing: Any construction that began on or before June 3, 1977.

New: Any construction or alteration by, on behalf of, or for the use of the recipient that began after June 3, 1977.

Accessibility issues:

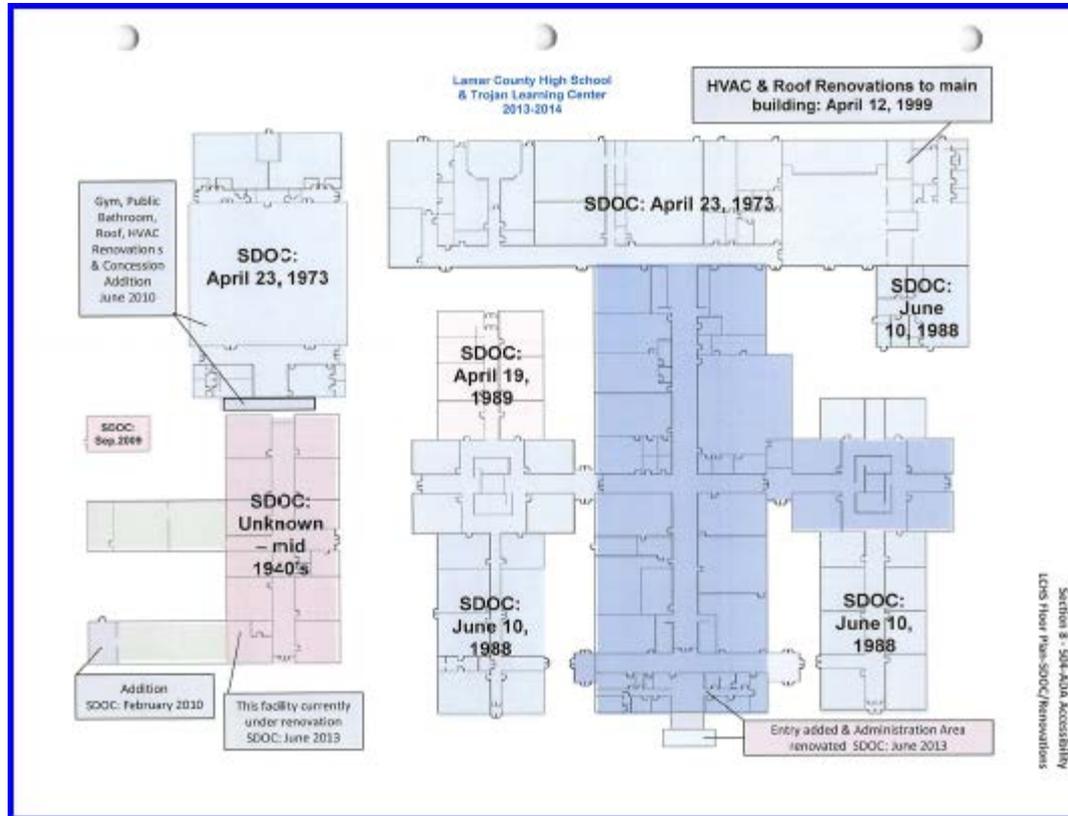


If you are a recipient of Federal funds as a public entity, you may not deny the benefits of your program or service to a qualified person with a disability because your [facilities](#) are inaccessible.

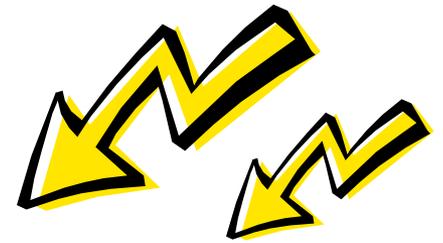


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FACILITY DIAGRAM WITH DATES OF RENOVATIONS



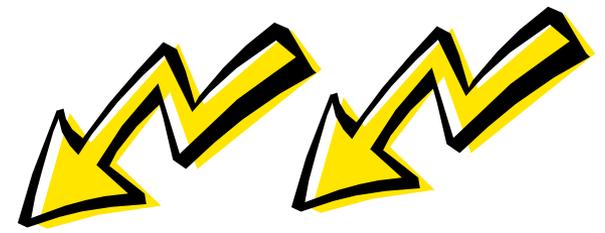
A FACILITY:



- Title II “...all or any portion of buildings, structures, sites, complexes, [equipment](#), rolling stock or other conveyances, roads, walks, passageways, parking lots, or other real or personal property including the site where the building property, structure, or equipment is located.”
- Section 504 “ all or any portion of buildings structures, equipment, roads, walks parking lots, or other real or personal property or interest in such property.”



Checklist



- Building Access/Parking
- Corridors/Restrooms
- Curbs, Ramps, Walks
- Water Fountains
- Signs/Common Areas
- Program Accessibility



Existing Facilities

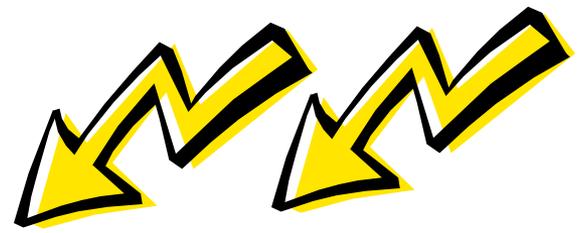


- Each section of a program activity when looked at, in its entirety, must be readily accessible to individuals with disabilities.
- Existing: Any construction that began on or before June 3, 1977.



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Construction Dates?



This is the date construction began.



Title II

The date that the bids were invited



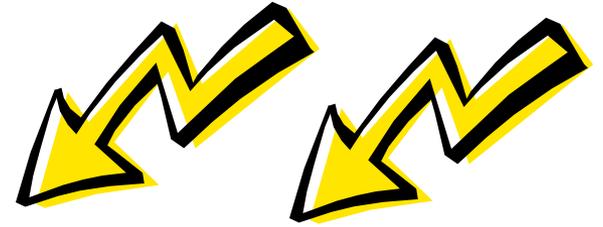
Section 504

The date of groundbreaking



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Guidelines and the Laws

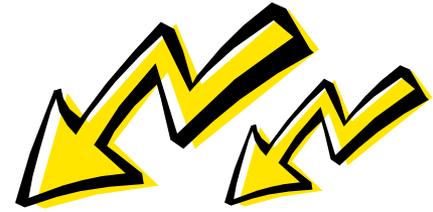
American National Standards Institute, Inc.
(ANSI) A117.1

- Uniform Federal Accessibility Standards (UFAS)
- Americans w/ Disabilities Act – Accessibility Guidelines (ADAAG)



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Dates of Construction



- June 4, 1977 to January 17, 1991 (ANSI)
- January 18, 1991 to January 26, 1992 (UFAS)
- January 27, 1992 to the Present (UFAS or ADAAG)

All construction since June 1977 is new under Section 504. Construction that began after Jan. 26, 1992 is also new under Title II. Between these dates, the standard of new construction under Section 504 always applies.



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The Belief is.....



- An educational institution's compliance with the Office for Civil Right guidelines & the Carl D. Perkins Vocational Education Act is an important aspect of excellence in Career Education.



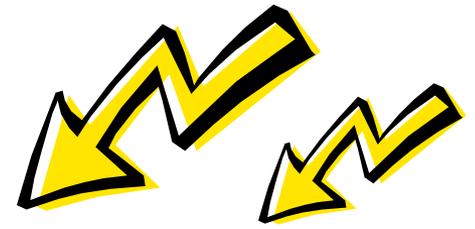
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Methods of Compliance



- Redesign of equipment
- Assignment of classes or other services to accessible locations within a facility
- Assignment of aides to students
- Delivery of services at an alternate accessible site
- Alteration of existing facilities and construction of new facilities
- Any other methods that result in making your programs or activities accessible





Compliance is **Not** Conditional on Demographics

Even if there is **not** a student with a physical disability enrolled, the public entity must be prepared to take steps to make all facilities, programs and/or activities accessible.



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Do all buildings have to be made
physically accessible?



No, not necessarily. While buildings constructed after the Section 504 regulation was issued (that is, those built since 1977) must be fully accessible, older buildings do not have to be made fully accessible. For older buildings, the law requires that the program or activity be made accessible.

“A common way this can be accomplished is to relocate the program to another building that is accessible”.



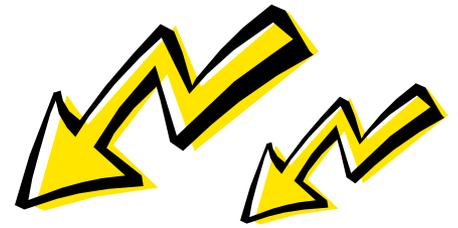
Give Priority..



- To those methods that result in the most integrated setting appropriate.
- Structural changes are not required where other methods are effective.
- Alterations to existing buildings necessary to provide access to the program must meet the accessibility requirements for new construction (ADAAG or UFAS standards)



Comparable Facilities



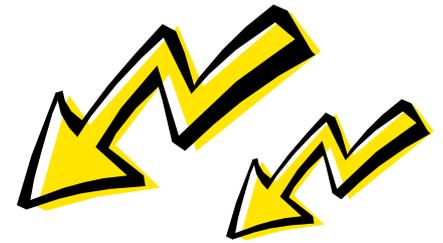
- All facilities, services, programs & activities provided to handicapped persons or LEP students shall be comparable to those of non-handicapped students or English speaking students.
- Facilities for one sex shall be the same for the other sex.

i.e.: school offers showers & lockers to its male physical education student – no showers for females



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Conditions...



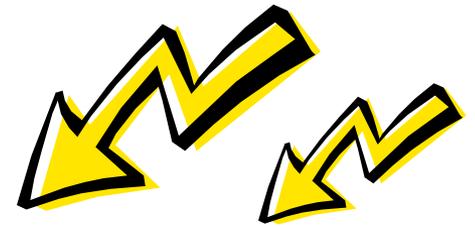
- Any and all **accessible** features and equipment must be maintained.
- Temporary interruptions in service or access are not prohibited, but should not persist beyond a reasonable period of time.



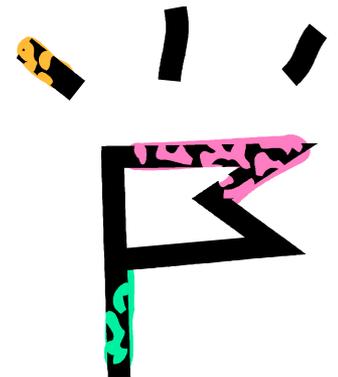
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Flag Issues...



- Emergency power off **switches** are too high
- Classes have a narrow **door** clearance
- **Counters** too high & insufficient clearance space
- Eye wash **sinks** being inaccessible to persons in wheelchairs
- FACS labs, especially food labs, are not chair accessible (**sinks, stoves**)
- Lack of disability signage



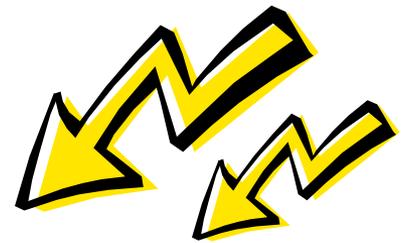
.....In Short



- For existing **facilities**, each part of the program or activity, when viewed in its entirety, must be readily accessible to individuals with disabilities.
- The focus here is on ensuring that persons with disabilities can fully benefit from the program or activity, regardless of the overall accessibility of the facility.
- This means you must make sure that a student with a physical disability is not limited from participating in a part of the program otherwise offered in an **inaccessible facility**.



Standards



- ANSI A117.1-1961 (R1971) Out of Print (Libraries)
- UFAS and ADAAG

<http://www.access-board.gov/gs.htm>

Areas of Investigation:



I. Comparable facilities compliance:

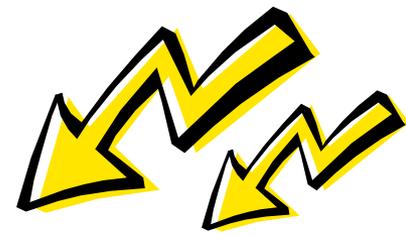
- ⇒ Separate programs or facilities
- ⇒ Changing rooms, showers and other facilities

DOCUMENTS REQUESTED:

NONE-interviews and observations



Areas of Investigation:



J. Work study

K. Apprenticeships

DOCUMENTS REQUESTED:

- ⇒ WBL opportunities available to all students
- ⇒ Notification to partnering employers and prospective employers

- 📌 Copies of WBL and YAP application and training agreements
- 📌 List of students participating in WBL program disaggregate by male/female, black/white/Hispanic, LEP, and disability; enrollment data



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WORK STUDY DOCUMENTATION

Section 10 - 2.d. Partnering Employers and Prospective Employers
Work-Based Learning Application

Work-Based Learning Program
Lamar County College & Career Academy
#1 Trojan Way
Barnesville, GA 30224
770-358.8641

Educational Training Agreement

Student's Name: _____

Parent/Guardian Name: _____

WBL Coordinator's Name: Mrs. Donna Andrews

Employing Company Name: Lamar Co. DICS

Supervisor's Name: Christy Holliman

Employer Address: 122 Westgate Plaza Barnesville Ga.

Employer Telephone Number: 770-358-5176

Employer E-Mail Address: Cholliman@chr.state.ga.us

NON-DISCRIMINATION POLICY: It is the policy of the Lamar County School Board as a participant in the Work-Based Learning Program to offer the opportunity to students to participate in programs and activities without regard to age, race, color, creed, national origin (Title VI of the 1972 Educational Amendments), handicap (Section 504 of the Rehabilitation Act of 1973 and PL 94-142) or sex (Title II of the Educational Amendments of 1976 and PL 94-482) and provides access to Boy Scouts and other designated youth groups.

Enrollment Data for WBL
Lamar County College & Career Academy

2012-2013

Sex: 15 Females/18 Males

Race: 5 Black/27 White/1 Latino

Disabled: none

LEP: none

2011-2012

Sex: 21 Females/12 Males

Race: 18 Black/13 White/2 Latino

Disabled: none

LEP: none

Areas of Investigation:



L. Employment compliance:

- ⇒ Notification of nondiscrimination to faculty and staff
- ⇒ Salary and other benefits are nondiscriminatory
- ⇒ Recruitment procedures are nondiscriminatory
- ⇒ Employment open to all persons

DOCUMENTS REQUESTED:

- 📍 Provide copies of job postings for recent certified and classified staff position
- 📍 Provide dated copies of position recruitment advertisements, other than job postings, placed in newspapers, periodicals etc. if available.
- 📍 Provide copies of all employment application forms.
- 📍 Provide a list of organizations/agencies where job announcements appear.
- 📍 Provide copies of district/system staff recruiting materials.
- 📍 Provide a copy of the staff handbook.
- 📍 Provide copy of web site announcements for employment

EMPLOYMENT APPLICATIONS

Section 11 - 1.d. Notification to Faculty & Staff
Classified Application

For Office Use Only:
Date Received: _____
Received By: _____
CC: _____ Date: _____
CC: _____ Date: _____
CC: _____ Date: _____

CLASSIFIED STAFF APPLICATION

Lamar County Schools
100 Victory Lane
Barnesville, GA 30204-1544
770-358-5891 • FAX 770-358-5897
E-mail: personnel@lamar.k12.ga.us
www.lamar.k12.ga.us

Office Use Only
Update: _____
Update: _____
Update: _____
Update: _____

The Lamar County Board of Education does not discriminate against any applicant for employment in the Lamar County School System on the basis of age, sex, race/color, religion/creed, gender, national/ethnic origin, handicap/disability, or citizenship status.

INSTRUCTIONS: Complete (please type or print) all sections accurately. Use Black Ink.

PERSONAL DATA

Name: _____
Social Security Number: _____
Mailing Address: _____
City, State, Zip: _____
Phone Number(s) Home: _____ Current Salary: _____
Current Job: _____

POSITIONS DESIRED, in order of preference (clerical, custodian, school nutrition, transportation, substitute teacher)

1. _____ 2. _____
3. _____ 4. _____

Date available to begin employment: _____

List any special skills or training that you have relating to the position(s) for which you are applying:

Have you ever worked for this system before? _____ Yes _____ No
If Yes: What Position? _____ When? _____

BUS DRIVERS ONLY: Do you have a Commercial Driver's License (CDL)? Must submit a MVR prior to offer of employment.
_____ YES CDL#: _____ NO (Required if employed)

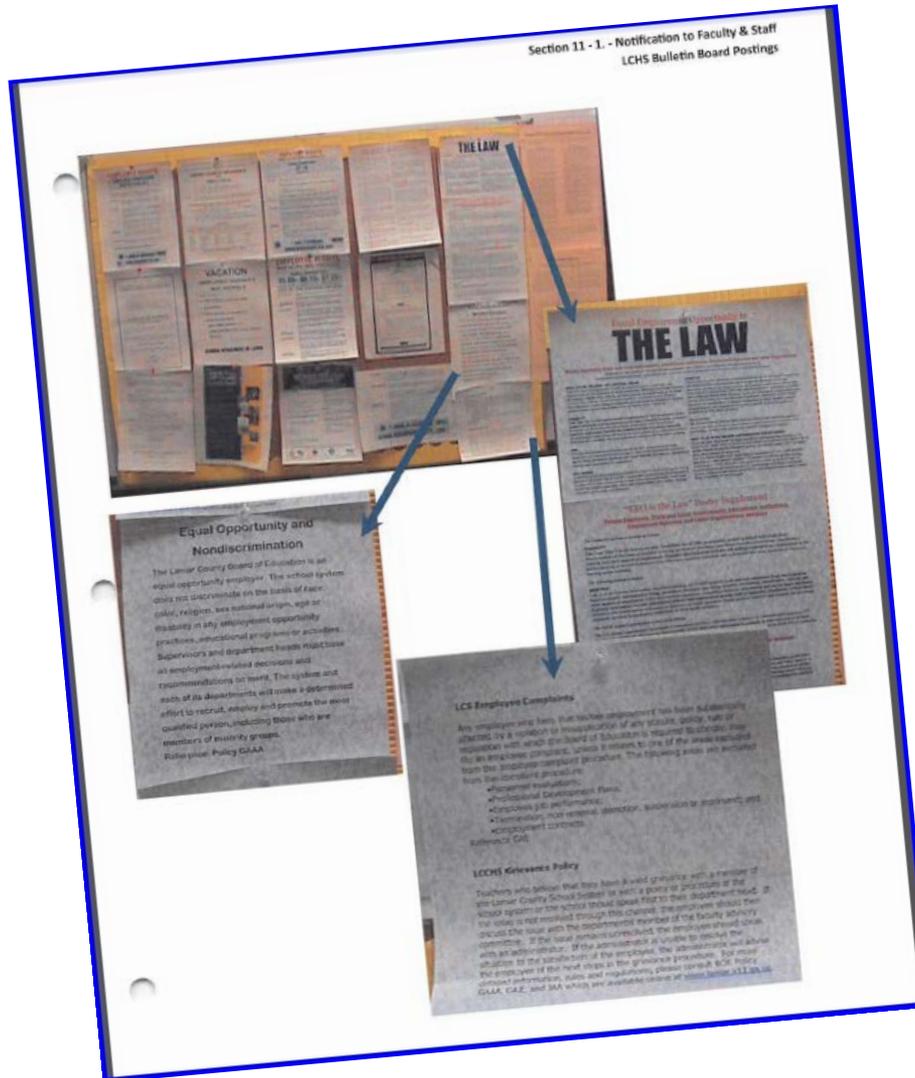


Non Discrimination Statement

©1997 documentApplicationsclassified application

RDV: September 10, 2007

BULLETIN BOARD OR JOB POSTINGS



GETTING READY FOR THE VISIT

Who are the system's contact persons for OCR Compliance Review?

1. System Superintendent (initial contact for system)
2. CTAE Director or Coordinator
3. School System OCR Committee Chair (if other than above)
4. Special Ed Director, Maintenance/Facilities Director, Director of Counseling and Human Resource Director

GETTING READY FOR THE VISIT (Con't)

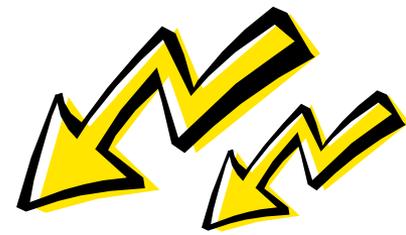
What should a system do to be ready for the review?

1. Inform the school system staff
2. Convene an OCR system team
3. Notify GaDOE of system contact
4. Team identifies documents for on-site review team
5. Develop agenda
6. Complete electronic facilities accessibility
7. Complete electronic self-assessment
8. Identify interview participants
9. Schedule OCR meeting room
10. Make arrangements for lunch
11. Schedule room for brief exit report
12. Secure necessary floor plans
13. 14 days prior to review send enrollment data to GaDOE

Prepare Documentation Notebook

The following items should be compiled in a notebook format with photocopies of the original documents or evidence. If nothing exists, please make that notation on a sheet of paper and insert in the appropriate place. The notebook sections should be labeled with dividers between sections in order as in this outline. These compiled documents will need to be retained by the compliance review team at the end of the site visit. Do not include full notebooks/handbooks/etc. unless requested to do so. A copy of the front page of the notebook/handbook/etc. and the specific section being addressed is usually sufficient. The review team chairperson will coordinate this.

Interviews:



Who?

There are six subgroups to be interviewed:

- Students
- Parents
- Instructors
- Counselors/504 Coordinator & Special Pop's Director
- Administration
- (Schedule five 30 minute sessions with a 5-minute break between each. In this order.)

Typical Questions:

Are you aware of any harassment in the school?

Are male and female facilities equal?

How do students select classes?

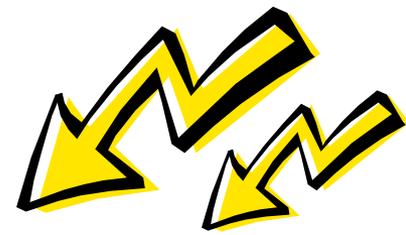
How did you find out about the position you now have?

What career planning have you experienced with your students?

Are you aware of the grievance procedure? Where can you find the process?

Are you aware of any discriminatory issues or situations in system?

Interviews:



Who to include?

Students

- 8-10 students
- CTAE and
- Non CTAE students
- WBL
- Minority, and/or disabled
- Male/Female

Should be representative of your school population.

Typical Questions:

Do you have a career plan?

Are you aware of any harassment in the school?

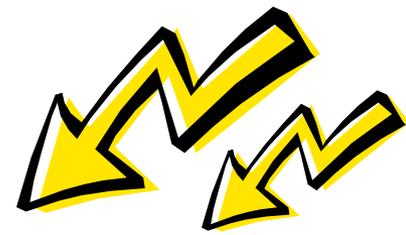
Are male and female facilities equal?

How do students select classes?

What career planning have you experienced ?

Are you aware of any discriminatory issues or situations in system?

Interviews:



Who to include?

Parents

- 8-10 parents
- Minority
- male/female

Should be representative of your school population. Do not choose all parents who are also employees.

Typical Questions:

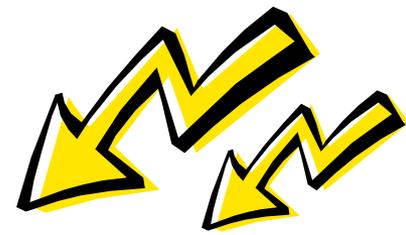
Are you aware of any harassment in the school?

Are male and female facilities equal?

How do students select classes?

What career planning have you experienced with your child?

Interviews:



Who to include?

Instructors

- 8-10 teachers
- CTAE
- Non CTAE teachers
- WBL Coordinator
- Minority and/or Disabled
- Male/Female

Should be representative of your school population.

Typical Questions:

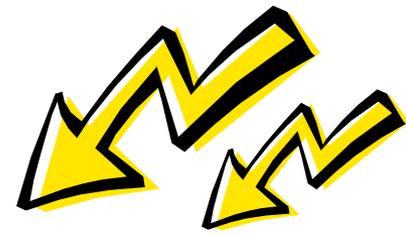
Are you aware of any harassment in the school?

Are male and female facilities equal?

How do students select classes?

How did you find out about the position you now have?

Interviews:



Who to include?

School Counselors

- 2-4 School Counselors
- Graduation Coach
- Male/Female
- Minority

Typical Questions:

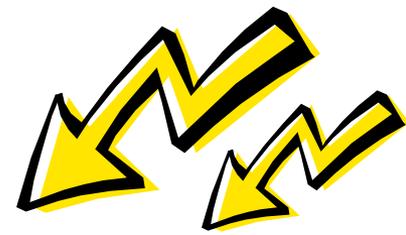
Are you aware of any harassment in the school?

Are male and female facilities equal?

How do students select classes?

What career planning have you experienced with your students?

Interviews:



Who to include?

Administrators

- Administrators(building level)
- Administrators(district level)
- HR Director
- Special Pop's Director
- Title IX and 504 Coordinator
- Male/Female
- Minority

Typical Questions:

Are you aware of any harassment in the school?

Are male and female facilities equal?

How do students select classes?

How did you find out about the position you now have?

Student Demographics Data Submitted with Documentation Prior to Visit



**FY2014 Office of Civil Rights (OCR) On-Site Review
Student and Instructor Demographics Form**

System Name: _____

High School Name: _____

Review Date: _____

CTAE Administrator Name: _____

Student Demographics		
Demographic Description	Total Number	Overall Percentage
American Indian		
Asian or Pacific Island		
Black, not Hispanic		
Hispanic		
White, not Hispanic		
Other		

Instructor Demographics		
Demographic Description	Total Number	Overall Percentage
American Indian		
Asian or Pacific Island		
Black, not Hispanic		
Hispanic		
White, not Hispanic		
Other		

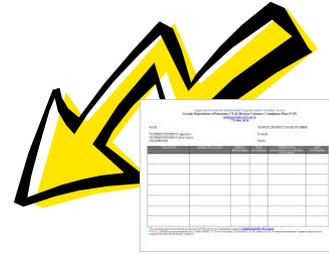
Special Demographics		
Demographic Description	Total Number	Overall Percentage
Students with Disabilities		
ESOL		

Georgia Department of Education
John D. Barge, State School Superintendent
March 1, 2015



Dr. John D. Barge, State School Superintendent
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What Happens After the Visit:



- OCR Team will provide a brief exit report
- Superintendent will receive (letter of finding(s))-LOF written report within 6 weeks after the visit
- System must submit (VCP) Voluntary Compliance Plan within 4 weeks of receiving the letter of finding(s)
- State must submit a biennial report of all review findings and voluntary compliance plans



Suggested Format for Educational Program and/or Facilities Access
Georgia Department of Education, CTAE Division Voluntary Compliance Plan (VCP)
ranukam@doe.k12.ga.us
 770-500-2029

DATE

SCHOOL DISTRICT NAME/NUMBER

*SUPERINTENDENT (signature)

E-MAIL

*SUPERINTENDENT (print name)

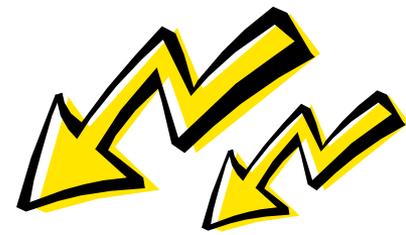
TELEPHONE#

FAX#

VIOLATIONS	CORRECTIVE ACTION	PERSON RESPONSIBLE	DATE TO INITIATE	VERIFICATION <small>(pictures, meeting minutes, publications, invoices, materials)</small>	DATE COMPLETED

***NOTE:** A electronic PDF copy must be emailed with the Superintendent's signature (plan will not be accepted without the Superintendent's signature) to Lplan@doe.k12.ga.us.

Resources:



- <http://www.access-board.gov/adaag/html/adaag.htm> ADDAG
- <http://www.access-board.gov/> United States Access Board
- <http://www.ed.gov/about/offices/list/ocr/topics.html?src=rt> Alpha OCR topics
- <http://www.ed.gov/about/offices/list/ocr/ell/analysis.html> LEP
- <http://www.ed.gov/about/offices/list/ocr/ellresources.html> ELL/LEP
- <http://www.ed.gov/about/offices/list/ocr/docs/hq43ef.html> Counseling
- <http://www.ed.gov/about/offices/list/ocr/docs/hq9806.html> Deaf
- <http://www.ed.gov/policy/rights/guid/ocr/disability.html> Disability
- http://www.ed.gov/about/offices/list/ocr/publications.html#Title_IX Sexual Harassment
- <http://www.ed.gov/about/offices/list/ocr/docs/nondisc.html> Notice of Nondiscrimination



Resources...



- <http://www.ed.gov/policy/rights/guid/ocr/racenational.html> Race and National Origin
- <http://www.ed.gov/about/offices/list/ocr/docs/placpub.html> Disability (Student Placement)
- <http://www.ed.gov/about/offices/list/ocr/504faq.html> Procedural Safeguards
- <http://www.ed.gov/about/offices/list/ocr/docs/tviassgn.html> Enrollment in programs/courses
- <http://www.ed.gov/policy/rights/guid/ocr/sex.html> sex discrimination
- <http://www.ed.gov/print/about/offices/list/ocr/docs/hq53e8.html> employment
- <http://www.ed.gov/about/offices/list/ocr/docs/tviassgn.html> Student Assignment in Elementary and Secondary School & Title VI



Common Acronyms...

- OCR-Office for Civil Rights
- OVAE-Office of Vocational and Adult Education
- MOA-Methods of Administration
- ED-US Department of Education
- ADA-Americans with Disabilities Act
- CTAE-Career, Technical and Agricultural Education or CTE-Career and Technical Education
- LEP-Limited-English Proficient or ELL-English Language Learner
- LOF-Letter Of Finding
- VCP-Voluntary Compliance Plan
- FAPE-Free and Appropriate Public Education
- ANSI-American National Standards Institute, Inc. (June 4, 1977 to January 17, 1991)
- UFAS-Uniform Federal Accessibility Standards (January 18, 1991 to January 26, 1992)
- ADAAG-ADA Accessibility Guideline (January 27, 1992 to the Present)
- WBL-Work-Based Learning (work-study or Youth Apprenticeship (YAP))



Review of Appendices



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Questions &

Comments



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Revised: February 2013