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

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Targeted schools:

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

2015-2016 Systems
1. August 25 - Atlanta City Schools
2. August 26 - DeKalb County
3. September 1 - Dublin City Schools
4. September 2 - Talbot County
5. September 9 - Quitman County
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.
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.
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
More Accountability = Greater Credibility

• Perkins Monitoring & Risk Assessment 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 20% of the systems
  • Serves as a mechanism for evaluation both internally and externally
  • Provides professional learning for team members
Legislation & Resources:


✓ 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
✓ Interviews: Parents, students, instructors, 504 coordinator, Title IX coordinator, Exceptional Children’s coordinator, administration and counselors. Team will be asked probing questions to verify compliance.
✓ 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.
Process con't...

- 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)
- 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
LAMARR COUNTY
PVS1 GEORGIA OER COMPLIANCE REVIEW
Section 1 – Administrative Compliance

Recipients need to have written policies in place to comply with the OER Guidelines.
Title 6, 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
VI, Title IX, and Section 504, and a procedure to file a complaint that will allow students, parents
and employees of the elementary and secondary levels an avenue through which to report and
manage alleged discrimination. The district must provide adequate evidence that it takes
appropriate steps to notify participants, beneficiaries, applicants, students and secondary
school parents, employers, including those with impaired vision or hearing, and others on all
aspects of the procedures that does not discriminate on the basis of race, color, national
origin, sex or disability.

1. Continuation of non-discrimination Notice (Title VI, Title IX, 34 CFR 100.3, Section 504, 34
   CFR 300.530).
   Yes _X_ No ___
   The district must continue the School’s Non-Discrimination Notice. Yes _X_ No ___
   The non-discrimination statements are included in the district’s handbook.
   Yes _X_ No ___
   Attach a scanned copy of the School’s non-discrimination statement as shown in the
   following documents. Make sure the source and page number are attached for each scan.
   - RCE Manual - see attached copy of System SOE Policy web page;
   - Student Services 504 Accommodations web page
   - System Website - see attached copy of System web page
   - School(ies) Website(s) - see attached copy of LCS web page
   - Student Handbook - see attached copy of Student Handbook, pages 7
   - Teacher Handbook - see attached copy of Teacher Handbook, page 5
   - Parent Handbook - see attached copy of LCS Code of Conduct & Student/Parent Handbook, pages 24 & 42
   - Other school documents - see attached copy of Employee Handbook, pages 3, LCS Letterhead, SNP Application, LCS School Profile, LCS Course Description Guide, page 2

2. Person Responsible for coordinating Title IX and Section 504 (Title IX, 34 CFR
   30C.A. Section 504, 34 CFR 104.7, 104.40)
   a) Name and contact information of each employee of the district designated to

Answer Yes or No

Required Evidence or Documentation
NONDISCRIMINATION STATEMENT
Appendix E

Copy of Non-Discrimination Statement in local newspaper prior to the first day of school.
CONTINUOUS NONDISCRIMINATION STATEMENTS
Appendix F
CONTINUOUS NONDISCRIMINATION STATEMENTS

Appendix F

Examples

Letterheads, Brochures, Applications, websites, etc.

Revised February 9, 2015
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

Revised February 9, 2015
FACILITY DIAGRAMS

Revised February 9, 2015
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, disabled and LEP.

- Provide evidence of employment recruitment activities.
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 can be rewarding during GA411 lab time during TAA, students can search grants as they update their graduation plan.
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 18 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
- Complete your system or school coordinator for additional requirements.

Employee Responsibilities
- Provide a mentor for the student
- Advise to a Training Agreement and defined Training Plan
- Advise to State and Federal regulations and guidelines for student and program
- 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, WAP/WS Coordinator
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 abide by 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.

http://www.ed.gov/about/offices/list/ocr/docs/lau1970.html

Revised February 9, 2015
Scholarship & Financial Aid Procedures

Narrative of Scholarship Procedures

Scholarship and grant 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.
Areas of Investigation:

F. Counseling issues compliance:

デザイン Counseling materials and activities
デザイン Course and program selection process
デザイン Students with disabilities placement and program selection process
デザイン Disproportionate enrollments

DOCUMENTS REQUESTED:

デザイン Provide copies of all career assessments used with students and timeline for their administration.

デザイン Provide copies of career-related brochures, newsletters, flyers from the counseling department, scholarship notifications, power points etc.

デザイン Provide labor market information shared with all students.

デザイン 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

DOCUMENTS REQUESTED:

- Provide a list of supplementary aids and services available to disable 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)

<table>
<thead>
<tr>
<th>Student Name:</th>
<th>IEP Dates: from 3/30/2013 to 3/28/2014</th>
</tr>
</thead>
</table>

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

<table>
<thead>
<tr>
<th>Student Name:</th>
<th>Date of Birth:</th>
<th>GTID#:</th>
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<table>
<thead>
<tr>
<th>Eligibility Category(s):</th>
<th>School: Lamar County Comprehensive High School</th>
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<tbody>
<tr>
<td>SPECIFIC LEARNING DISABILITY</td>
<td>Grade: 10 School Year: 2013</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Most Recent Eligibility Dates:</th>
<th>IEP Implementation Date:</th>
<th>IEP Ending Date:</th>
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</thead>
</table>

Parent(s):

<table>
<thead>
<tr>
<th>Parent:</th>
<th>Address:</th>
<th>Email:</th>
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<thead>
<tr>
<th>Phone (Home):</th>
<th>Work:</th>
<th>Cell Phone:</th>
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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.
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.
Construction Dates?

This is the date construction began.

- **Title II**
  The date that the bids were invited

- **Section 504**
  The date of groundbreaking
Guidelines and the Laws

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

• Uniform Federal Accessibility Standards (UFAS)
• Americans w/ Disabilities Act – Accessibility Guidelines (ADAAG)
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.
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.
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.
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
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.
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 entirely, 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

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

DOCUMENTS REQUESTED:

- 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

Revised February 9, 2015
WORK STUDY DOCUMENTATION

Educational Training Agreement

Student's Name: _____________________________
Parent/Guardian Name: _____________________________
WBL Coordinator's Name: Mrs. Donna Andrews
Employing Company/Institution: _____________________________
Supervisor's Name: ___________________________________________
Employer Address: ___________________________________________
Employer Telephone Number: _____________________________
Employer E-mail Address: _____________________________

Work-Based Learning Program
Crisp County College & Career Academy
9 Indian Way
Barnesville, GA 30204
770-358-0547

NON-DISCRIMINATORY POLICY: It is the policy of the Crisp County School Board to provide an equal educational opportunity to all students to participate in the Work-Based Learning Program and all activities without regard to race, color, creed, national origin, sex, handicap, age, or disability. The school system is committed to the principles of Title II and Title IV of the Rehabilitation Act of 1973 and Section 504 of the Rehabilitation Act of 1973. Any individual who believes he or she has been discriminated against by the Crisp County School System may file a complaint with the Assistant Superintendent of Exceptional Student Services at Crisp County School System.

Richard Woods,
Georgia’s School Superintendent
“Educating Georgia’s Future”
gadoe.org

Enrollment Data for WBL
Crisp County College & Career Academy

<table>
<thead>
<tr>
<th>Year</th>
<th>Females</th>
<th>Males</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-2012</td>
<td>23</td>
<td>12</td>
</tr>
<tr>
<td>2012-2013</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

Race: 18 Black/33 White/1 Latino
LEP: none
Disabled: none

Enrollment Data for WBL
Lamar County College & Career Academy

<table>
<thead>
<tr>
<th>Year</th>
<th>Females</th>
<th>Males</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013-2014</td>
<td>15</td>
<td>18</td>
</tr>
<tr>
<td>2014-2015</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

Race: 5 Black/27 White/1 Latino
LEP: none
Disabled: none

Revised February 9, 2015

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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

Revised February 9, 2015
EMPLOYMENT APPLICATIONS

EMPLOYMENT APPLICATION

CLASSIFIED STAFF APPLICATION

Lamar County Schools
188 Victory Lane
Lamar, GA 30241
770-339-2651 or FAX 770-339-2697
E-mail: Personnel@LamarK12ga.org

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

PERSONAL DATA

Name: ___________________________ Address: ___________________________
Social Security Number: ____________ Date of Birth: ____________

Mailing Address: __________________ City, State, Zip: __________________
Current City, State, Zip: __________________
Phone Number: Home: ____________ Current Email: __________________
Cell: __________________

Positions Desired: In order of preference (Assistant, Custodian, school nurse, principal, teacher, etc.)

1. _____________________________ 2. _____________________________
3. _____________________________ 4. _____________________________

Date available to begin employment: __________________

NOTE: Some positions require proof of educational level such as Substitute Teacher, minimum of B.S.

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? _____________________________

If Yes: Do you have a Criminal History Information (CHI) form filed by a GCSB prior to offer of employment, YES _____ NO _____

If No: Do you live within 20 miles of any Lamar County School System campus? YES _____ NO _____

Section 1a - L.L. Notification to hereby A Staff Classified Application

Officer's Last Name: ____________________________
Position: ____________________________ Title: ____________________________
Signature: ____________________________
Date: ____________________________

Non-Discrimination Statement

Revised February 9, 2015
BULLETIN BOARD OR JOB POSTINGS

Revised February 9, 2015
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 five subgroups to be interviewed:

• Students
• Counselors
• Administrators
• Instructors
• Parents

(Schedule five 30 minute sessions with a 5-minute break between each.)

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

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?

Should be representative of your school population.
Interviews:

Who to include?

Parents
- 6-8 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
- Title IX and 504 Coordinator

**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
- 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?
### FY2016 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

<table>
<thead>
<tr>
<th>Demographic Description</th>
<th>Total Number</th>
<th>Overall Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian or Pacific Island</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Black, not Hispanic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, not Hispanic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Instructor Demographics

<table>
<thead>
<tr>
<th>Demographic Description</th>
<th>Total Number</th>
<th>Overall Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian</td>
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<td></td>
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</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Special Demographics

<table>
<thead>
<tr>
<th>Demographic Description</th>
<th>Total Number</th>
<th>Overall Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students with Disabilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>English Learners (EL)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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)

**Contact:**
- rannkam@doe.k12.ga.us
- 770-500-2039

<table>
<thead>
<tr>
<th>DATE</th>
<th>SCHOOL DISTRICT NAME/NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Columns:****

- **VIOLATIONS**
- **CORRECTIVE ACTION**
- **PERSON RESPONSIBLE**
- **DATE TO INITIATE**
- **VERIFICATION (pictures, meeting minutes, publications, invoices, materials)**
- **DATE COMPLETED**

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

**Revised February 9, 2015**
Resources:

- [http://www.ed.gov/about/offices/list/ocr/topics.html?src=rt](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](http://www.ed.gov/about/offices/list/ocr/ell/analysis.html) LEP
- [http://www.ed.gov/about/offices/list/ocr/ellresources.html](http://www.ed.gov/about/offices/list/ocr/ellresources.html) ELL/LEP
- [http://www.ed.gov/about/offices/list/ocr/docs/hq43ef.html](http://www.ed.gov/about/offices/list/ocr/docs/hq43ef.html) Counseling
- [http://www.ed.gov/about/offices/list/ocr/docs/hq9806.html](http://www.ed.gov/about/offices/list/ocr/docs/hq9806.html) Deaf
- [http://www.ed.gov/about/offices/list/ocr/publications.html#Title_IX](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](http://www.ed.gov/about/offices/list/ocr/docs/nondisc.html) Notice of Nondiscrimination
Resources...

- [http://www.ed.gov/about/offices/list/ocr/docs/placpub.html](http://www.ed.gov/about/offices/list/ocr/docs/placpub.html) Disability (Student Placement)
- [http://www.ed.gov/about/offices/list/ocr/504faq.html](http://www.ed.gov/about/offices/list/ocr/504faq.html) Procedural Safeguards
- [http://www.ed.gov/about/offices/list/ocr/docs/tviassgn.html](http://www.ed.gov/about/offices/list/ocr/docs/tviassgn.html) Enrollment in programs/courses
- [http://www.ed.gov/print/about/offices/list/ocr/docs/hq53e8.html](http://www.ed.gov/print/about/offices/list/ocr/docs/hq53e8.html) employment
- [http://www.ed.gov/about/offices/list/ocr/docs/tviassgn.html](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
Questions & Comments