

Sample Voluntary Compliance Plan

This Sample Voluntary Compliance Plan (VCP) is meant to provide technical assistance in drafting VCPs outlining the noncompliance findings that your agency makes pursuant to an MOA on-site review and the corrective action required to remedy each violation.

Although this fictional sample provides examples of corrective action that OCR has seen in a number of actual VCPs, it should not be construed as limiting or requiring a certain type of corrective action in an actual VCP. Likewise, the structure and language used is meant to provide technical assistance; it is not mandatory and subrecipients have a great deal of flexibility in drafting VCPs that are appropriate for the individual review. This sample should be read in conjunction with OCR's Sample Letter of Findings.

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Issue Area and Required Corrective Action (Filled out by WDE)	1) Specific Corrective Action to be Completed	2) Responsible Individual(s)	3) Target Completion Date	4) How completion of remedy will be reported and verified to State Agency
Annual Notice: Expand dissemination of the annual notice of nondiscrimination to the general public in English and Spanish. This may be accomplished through a variety of means, such as through direct mailing, publication in a local newspaper, or publication on the district's website prior to the first day of the next school year.	Publish the annual notice of nondiscrimination in <i>The Sample Times</i> and the local Spanish language newspaper prior to the first day of the 2013-2014 school year.	Superintendent.	August 2013.	The subrecipient will provide a copy of the published notice from both newspapers to State Agency.

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to State Agency
Grievance Procedures: Revise the Title IX and Section 504/Title II grievance procedures to include designated and reasonably prompt timeframes for all major stages of the complaint process.	Same.	Superintendent.	April 2013.	The subrecipient will provide a copy of the revised grievance procedures to State Agency.
Counseling and Prospects for Success: Eliminate and prevent any steering of students into or away from particular CTE programs on the basis of disability.	Provide training to the school’s counselors to eliminate and prevent any steering of students with disabilities into particular CTE classes. Post the Section 504 grievance procedures in the counseling center.	Superintendent.	April 2013.	The subrecipient will send State Agency an email confirming that the training(s) has occurred, including the date(s) of the training(s), the agenda(s) for the training(s), and the number of counselors, and any other school personnel who attended. The email will also confirm that the Section 504 grievances procedures are posted in the counseling center.
Counseling and Prospects for Success: Develop and implement a plan to regularly evaluate	Same.	Superintendent.	April 2013.	The subrecipient will send State Agency a copy of the new plan, along with

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<p>counseling activities to ensure that they are not discriminatory, particularly on the bases of disability or sex. If any discrimination is discovered, modify the counseling program to eliminate and prevent the discrimination.</p>				<p>results of the first review and a description of any necessary modifications to the current counseling program.</p>
<p>Access for Students with Disabilities: Pave or otherwise provide a stable, firm, and slip resistant ground surface in the courtyard to create an accessible route consistent with Chapters 3 and 4 of the 2010 ADA Standards.</p> <p>Alternatively, designate an existing accessible space for outdoor dining.</p>	<p>Pave the courtyard.</p>	<p>Facilities Manager.</p>	<p>July 2013.</p>	<p>The subrecipient will email photographs of the paved courtyard to State Agency.</p>
<p>Access for Students with Disabilities: Expand the width</p>	<p>Same.</p>	<p>Facilities</p>	<p>July 2013.</p>	<p>The subrecipient will email a photograph of the doorway,</p>

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the doorway to the cafeteria to at least 32 inches, in accordance with section 404.2.3 of the 2010 ADA Standards.		Manager.		being measured with a tape measure, to State Agency.
Access for Students with Disabilities: Insulate the pipes under the “accessible” sink in the second floor girls’ restroom (room 210) in accordance with section 606.5 of the 2010 ADA Standards.	Same.	Facilities Manager.	March 2013.	The subrecipient will email a photograph of the insulated pipes to State Agency.
Access for Students with Disabilities: In accordance with section 308.2.1 of the 2010 ADA Standards (see also, advisory 606.1), lower the paper towel dispenser in the second floor boys’ restroom (room 211) to a height between 15 and 48 inches above the floor.	Same.	Facilities Manager.	May 2013.	The subrecipient will email a photograph of the paper towel dispenser, with the height being measured with a tape measure, to State Agency.

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<p>Access for Students with Disabilities: Add two accessible parking spaces in the student parking lot, to increase the total to eight, in accordance with section 208.2 of the 2010 ADA Standards. In accordance with section 208.2.4, two of the spaces must be van accessible spaces that comply with section 502 of the 2010 ADA Standards.</p>	<p>Same.</p>	<p>Facilities Manager.</p>	<p>July 2013.</p>	<p>The subrecipient will send a photograph of the accessible parking spaces, including the van accessible spaces, to State Agency.</p>
<p>Access for Students with Disabilities: Adjust the height</p>	<p>Same.</p>	<p>Facilities</p>	<p>May 2013.</p>	<p>The subrecipient will email a photograph of the shower</p>

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the shower threshold in the first-floor science lab to ½ inch or lower.		Manager.		threshold, with the height being measured with a tape measure, to State Agency.
<p>Services for Students with Disabilities: Resolve the past failures to provide services to students with disabilities as required under Section 504. Ensure that the school employs the necessary professionals to provide these services.</p>	<p>Sample High School will meet with the parents of all affected students covered under Section 504 to address the missed services. Sample High School will hire a speech language professional and a substitute physical therapist to provide necessary services. Additionally, Sample High School will develop a procedure for hiring an itinerate or back-up physical therapists who can fill in when the school’s physical therapist is unavailable to work.</p>	Subrecipient’s Section 504 Coordinator.	May 2013.	The subrecipient will provide a letter verifying that meetings occurred with parents of students who did not receive services. The subrecipient will also confirm, via email, that a speech language professional has been hired, and send a copy of the procedures for hiring an itinerate or back-up physical therapist.

Sample VCP

For Technical Assistance Only

Superintendent / College President / Designated Representative
(Circle Applicable Designation)

Authorized Signature: _____

Date: _____