

Wyoming Department of Education

METHODS OF ADMINISTRATION ONSITE CIVIL RIGHTS COMPLIANCE CHECKLIST



The Office of Superintendent of Public Instruction, Career and Technical Education (CTE) Department, actively supports the mission of the U.S. Department of Education Office for Civil Rights: “To ensure equal access to a high quality education for all students through the vigorous enforcement of civil rights”.

Federal requirements of the Methods of Administration (MOA) Civil Rights Onsite Compliance Visit.

U.S. Department of Education regulations implementing:

- Title VI of the Civil Rights Act of 1964 (Title VI), 34 CFR Part 100
- Title IX of the Education Amendments of 1972 (Title IX), 34 CFR Part 106
- Section 504 of the Rehabilitation Act of 1973 (Section 504), 34 CFR Part 104
- Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, and National Origin, Sex and Handicap (Guidelines), 34 CFR Part 100 Appendix B

U.S. Department of Justice regulations implementing:

- Title II of the Americans with Disabilities Act of 1990 (Title II), 28 CFR Part 35

For information about MOA Civil Rights Onsite Reviews, please contact:

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MOA ONSITE CIVIL RIGHTS COMPLIANCE CHECKLIST

SECTION 1 ADMINISTRATIVE																																			
Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status																														
			Yes	No																															
Administrative Issues																																			
<p>Recipients need to have certain basic requirements in place to comply with the OCR Guidelines, Title VI, Title IX, Section 504 and Title II. These basic procedures include an annual public notice, continuous notification, designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II and a grievance procedure that will allow students an avenue for dealing with alleged discrimination. To verify this, it will be necessary to review many documents and to interview administrators, Title IX and Section 504 coordinators, faculty and students.</p> <p>Suggested Persons to Interview: PR person, some administrators, students, and parents (particularly LEP students and students with sensory impairments).</p>																																			
1.1 Continuous Nondiscrimination Notice																																			
<p>A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability. <u>Title IX: 34 CFR 106.9</u> <u>Section 504: 34 CFR 104.8</u></p>	<p>A variety of recipient publications notifies applicants, students, employees and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<p>Is nondiscrimination notice found in the following publications:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="padding: 2px;"><u>Brochures on programs, activities</u></td><td style="width: 5%;"></td><td style="width: 5%;"></td></tr> <tr><td style="padding: 2px;"><u>Student application</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Job application</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Catalog</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Student handbook</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Job announcements</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Posters advertising various programs</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Recruitment materials</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>School newspaper</u></td><td></td><td></td></tr> <tr><td style="padding: 2px;"><u>Website</u></td><td></td><td></td></tr> </table>	<u>Brochures on programs, activities</u>			<u>Student application</u>			<u>Job application</u>			<u>Catalog</u>			<u>Student handbook</u>			<u>Job announcements</u>			<u>Posters advertising various programs</u>			<u>Recruitment materials</u>			<u>School newspaper</u>			<u>Website</u>			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined		
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Comments																																			

SECTION 1 ADMINISTRATIVE

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation		Status	
		Yes	No		
1.2 Persons Responsible For Coordinating Title IX and Section 504					
<p>Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX.</p> <p>The recipient must notify students and employees of the name, office address, and phone number of the designated employee(s). <u>Title IX: 34 CFR 106.8</u> <u>Section 504: 34 CFR 104.7(a)</u></p>	<p>Recipient has assigned a person(s) to coordinate Section 504, Title II, and Title IX activities. This (these) person(s) must be aware of their duties and responsibilities and have the training necessary to carry out their responsibilities.</p> <p>Recipient lists coordinators of Section 504, Title II, and Title IX with their name/title, address, and phone number in the notice of nondiscrimination.</p>	Catalogs			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined
		Handbooks			
		Job descriptions			
		Website			
		Interviews with Section 504, Title II, and Title IX coordinators			
		Interview students, particularly nontraditional and disabled			
		Interview some faculty and administrators			
Comments					

SECTION 1 ADMINISTRATIVE

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
1.3 Annual Public Notification					
<p>Prior to the beginning of each school year, recipients must advise students, employees and general public that all vocational opportunities will be offered regardless of race, color, national origin, sex or disability.</p> <p>The notice must include a brief summary of program offerings and admission criteria and the name, office address, and phone number of persons designated to coordinate compliance under Title IX and Section 504. <u>Title IX: 34 CFR 106.8(b)</u> <u>Section 504: 34 CFR 104.7(a)</u> <u>Title II: 28 CFR 35.107(a)</u> <u>Guidelines IV-O</u></p>	<p>Recipient issues annual public notice of nondiscrimination.</p> <p>The notice also is disseminated in the language of any national origin minority community in the service area.</p> <p>Annual notice lists coordinators of Section 504/ADA and Title IX with their name/title, address, and phone number.</p>	Is the notice in:			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined
		Local newspapers?			
		Institution newspapers?			
		Other publications?			
		On the website?			
		Does notice have brief description of program offerings and admission criteria?			
		Do publications with notice reach students, employees, and applicants? Describe how distributed. Ask administrators how this process is handled.			
		Is notice available to the visually impaired? Describe method used. Ask administrators what is done.			
		Does community have national origin minority students with limited English language skills? (Check census data and/or ask administrators, faculty, and students) If yes, is notice available in the language of that national origin minority community?			
How does notice get disseminated to national origin minority community? Ask faculty and administrators about the process.					
Comments					

SECTION 1 ADMINISTRATIVE

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
1.4 Grievance Procedure					
A recipient shall adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability. <u>Section 504: 34 CFR 104.7(b)</u> <u>Title IX: 34 CFR 106.8(b)</u> <u>Title II: 28 CFR 35.107(b)</u>	Recipient notifies students and employees that there is a grievance procedure for persons who feel they have been discriminated against based on sex or disability. The procedure is readily available to students and employees and it is prompt and	Student handbooks			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined
		Employee handbooks			
		Catalogs			
		Data on complaints			
		Interviews with faculty, students, and administrators			
		Interviews with Section 504/ADA and Title IX coordinators			
Comments					

SECTION 2 RECRUITMENT

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation	Yes	No	Status

Recruitment Issues

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should represent persons of different races, national origins, sexes and disabilities.

2.1 Recruitment Activities

Recipients must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability. Title IX: 34 CFR 106.23 (a)(b) Guidelines V-C	All potential students have access to information. Efforts are made to reach underrepresented groups.	Recruitment plans			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		List of recruitment activities and sites			
		Description of recruitment activities			
		Available in other languages/formats			
	Comments				

2.2 Recruitment Materials

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disability. Guidelines V-C	Descriptions of career opportunities are bias-free and free from stereotyping	Recruitment brochures and marketing materials			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Course catalog			
		Available in other languages/formats			
	Comments				

SECTION 2 RECRUITMENT

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
2.3 Recruiting Teams					
To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities. <u>Guidelines V-C</u>	Where possible, persons of differing races, genders, and disability are used for recruiting purposes. (However, a failure to do so should not be construed as noncompliance.)	Staff demographics by program			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Recruitment team demographics by program			
Interviews					
Comments					
2.4 Counseling LEP/Sensory Impairments					
Recipients must ensure that counselors can effectively communicate with students with limited English proficiency and with students with sensory impairments. <u>Guidelines V-D</u>	The content of materials available to other students and their parents is available to students and parents who speak languages other than English. Formats other than the printed word are available for students with disabilities.	Written plan for the provision of services for ESL individuals			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Written plan for provision of services for hearing impaired individuals			
		Samples of materials in other languages/formats			
Comments					

SECTION 2 RECRUITMENT

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
2.5 Promotional Efforts					
Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration. <u>Guidelines V-E</u>	Materials and/or media presentations show persons of varying races, male and female, persons with disabilities, and different national origins.	Promotional materials, including brochures, flyers, newspaper advertising, catalogs			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Comments			
2.6 Service Area LEP					
If a recipient's service area contains a community with persons of limited English proficiency, information must be available to that community in its language. <u>Guidelines V-E</u>	Process is in place to identify and communicate with language minority communities. Efforts are made to communicate in a commonly understood language.	Verification of limited English proficient community			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Samples of materials in other languages			
Comments					

SECTION 3 ADMISSIONS

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	

Admission Issues

Admission policies, procedures and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin or sex or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental or disability status should be avoided.

3.1 Discriminatory Criteria

<p>A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation. <u>Guidelines IV-K</u></p>	<p>Demographics of career-technical enrollment are similar to demographics of eligible pool or recipient provides a legitimate nondiscriminatory rationale.</p> <p>Demographics of specific vocational programs are similar to demographics of entire career-technical enrollment or recipient provides a legitimate nondiscriminatory rationale.</p> <p>Admissions procedure, policy, and/or practice for career and technical education program enrollment avoid criteria that disproportionately exclude persons of a particular race, color, national origin, sex, or disability status.</p> <p>Admissions criteria that disproportionately exclude have been validated as essential to participation.</p>	Admissions policy for career and technical education programs. Description of the admissions process			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Procedures and criteria for selective admissions for career and technical programs (where there are more applicants than can be accommodated)			
		Demographics of rejected applicants by selection criteria			
		Demographics of selected applicants by selection criteria			

Comments

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SECTION 3 ADMISSIONS

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation	Yes	No	Status
3.2 Preadmission Inquiries					
Recipients must avoid preadmission inquiries about marital, parental, or disability status. <u>Title IX: 34 CFR 106.21(c)</u> <u>Section 504: 34 CFR 104.42 (b)(4)</u> <u>Title II: 28 CFR 35</u>	Application forms and materials do not request information about marital, parental, or disability status.	Admissions application form and materials			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Available in other languages/formats			
Comments					
3.3 Disabled & Employment Limitation					
A recipient must not deny access to vocational and academic programs or courses to students with a disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons. <u>Section 504: 34 CFR 104.10</u> <u>Section 504: 34 CFR 104.43(c)</u> <u>Guidelines IV-N</u>	The agency does not discourage students with disabilities from participating in programs due to potential workplace discrimination.	Documentation of counseling			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Counseling materials			
		Enrollment data			
		Number of students with disabilities by program			
		Placement/follow-up data			
		Interviews			
Comments					

SECTION 3 ADMISSIONS

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
3.4 LEP & Benefit Limitation					
<p>A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.</p>	<p>Recipient has a procedure in place to identify and assess applicants with limited English proficiency.</p>	<p>Procedure for LEP identification and placement</p>			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		<p>Summary of steps taken to increase LEP participation in programs where they traditionally have been underrepresented</p>			
	<p>LEP enrollment in vocational education is proportional to LEP enrollment in the service area</p>	<p>Specific program enrollment demographics by LEP status</p>			
	<p>LEP enrollment in specific vocational programs is proportional to LEP enrollment in vocational education overall.</p>				
Comments					

SECTION 4 STUDENT FINANCIAL ASSISTANCE

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	

Financial Assistance Issues

Agencies are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the sub-recipient's nondiscrimination policy.

Agencies may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, national origin, or disability.

While this is primarily a postsecondary issue, ***secondary schools helping to prepare students for postsecondary experiences can help disadvantaged students by being aware of this requirement because financial aid is often the stumbling block for those historically underrepresented in postsecondary education.***

Interviews with the following persons may clarify compliance with this standard: Financial Aid Director, Financial Aid Counselors, Guidance Counselors, Department Chairs, Principals, Superintendent, Assistant Superintendent, Title IX Coordinator, 504/ADA Coordinators.

4.1 Financial Assistance Availability

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.37</u> <u>Section 504: 34 CFR 104.46(a)</u> <u>Guidelines VI-B</u>	Institutional data on financial aid demonstrates that there is equitable distribution of financial aid regardless of sex, race, color, national origin, or disability. If an apparent disparity exists, the institution offers a legitimate, nondiscriminatory reason.	Financial aid data by sex, race, color, national origin, or disability (summary level)			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with students			
		Interviews with financial aid staff			
		Interviews with counselors			
		Interviews with business managers			
Comments					

SECTION 4 STUDENT FINANCIAL ASSISTANCE

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation	Yes	No	Status
4.2 Sex-Restricted Awards					
Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex. <u>Title IX: 34 CFR 106.37 Guidelines VI-B</u>	Documentation is available as to the number and amount of aid given as a result of will, trust, bequest, or other legal instrument. Overall, the institution's financial assistance does not discriminate on the basis of sex.	Review of all financial assistance given as a result of trust, bequest, or other legal instrument			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Review of all sex-restricted financial aid given			
		Review total list of financial aid to ensure the overall effect does not discriminate			
Comments					
4.3 Equitable Financial Aid Information					
Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis. <u>Guidelines VI-B</u>	Materials written provide information equitably. All written materials contain the nondiscrimination statement. Institutional awards provided as a result of the group being historically underrepresented or as a result of a bequest, trust, or other legal instrument is acknowledged as such in the written materials.	Review materials written for students and families concerning the financial assistance available			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with students			
		Interviews with financial aid staff			
		Interviews with business managers			
Comments					

SECTION 4 STUDENT FINANCIAL ASSISTANCE

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
4.4 LEP Financial Aid Information					
National origin minority persons with limited English language skills receive information about financial assistance in their own language. <u>Guidelines VI-B</u>	Community demographics indicate that national origin minority persons with limited English language skills are a part of the population served by the agency. Communications about financial assistance is available in the home language of these members of the community.	Review written communications			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Review demographics of the area served by the agency (summary level)			
		Interviews with students			
		Interview bilingual interpreters			
Comments					

SECTION 5 COUNSELING AND PREVOCATIONAL PROGRAMS

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status								
			Yes	No									
Counseling Issues													
<p>Issues relating to counseling and prevocational programs may include steering of students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.</p> <p>Interviews with counselors, teachers, or courses /programs with disproportionate enrollment and students in “nontraditional” courses /programs may clarify compliance along with reviewing course catalogs, enrollment data and trends.</p> <p>List programs or classes with disproportionate enrollment:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Program</th> <th style="width: 50%;">Underrepresented Group</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>						Program	Underrepresented Group						
Program	Underrepresented Group												

5.1 Counseling Materials & Activities

Recipients must ensure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability. <u>Title IX: 34 CFR 106.21 (a)(b)</u> <u>Title IX: 34 CFR 106.36 (a)</u> <u>Title IX: 34 CFR 106.34</u> <u>Section 504: 34 CFR 104.4 (a), and 104.34 (a) and (c)</u> <u>Section 504: 34 CFR 104.47 (b)</u> <u>Title II: 28 CFR 35.130</u> <u>Guidelines V-A</u>	The written guidance plan, policy, and procedures ensure nondiscrimination. The written assessment plan ensures nondiscrimination.	Guidance plan, policy, and procedure			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Assessment plan with a list of tests administered			
		Written procedures for evaluation and placement of disabled students			
		Promotional and recruitment materials			
		Enrollment demographics (summary level)			
		Recruitment, admission policies			
		LEP policy			
		Calendar of counseling and pre-vocational activities			
Comments					

SECTION 5 COUNSELING AND PREVOCATIONAL PROGRAMS

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
5.2 Directing or Profiling					
<p>Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability.</p> <p><u>Title IX: 34 CFR 106.34</u></p> <p><u>Section 504: 34 CFR 104.47(b)</u></p> <p><u>Guidelines V-B</u></p>	<p>Vocational program enrollments by sex, race, national origin, and disability are proportionate to enrollment of these groups in the general student population.</p> <p>Where enrollments are not proportionate, the institution can furnish a legitimate, nondiscriminatory rationale.</p>	Admission criteria			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Enrollment forms			
		Enrollment demographics by class/program			
Comments					
<p>5.3 Directing Toward Restrictive Career</p>					
<p>Recipients may not counsel disabled students toward more restrictive career objectives than nondisabled students with similar abilities and interests.</p> <p><u>Section 504: 34 CFR 104.37(b)</u></p> <p><u>Guidelines V-B</u></p>	<p>Students with disabilities have equal access to all programs and classes based on abilities and interests.</p>	Examples of pre-enrollment counseling			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Enrollment data (summary level)			
Comments					

SECTION 5 COUNSELING AND PREVOCATIONAL PROGRAMS

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
5.4 Disproportionate Enrollment					
If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities. Title IX: 34 CFR 106.36 Guidelines V-B	Recipient has process in place to identify disproportionate enrollment. When disproportionate enrollment occurs, recipient assesses counseling materials and activities and makes appropriate revisions or can articulate a legitimate, nondiscriminatory rationale.	Examples of pre-enrollment counseling			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Enrollment data (summary level)			
		Examples of revised counseling materials or activities in response to disproportionate enrollments			
Comments					

SECTION 6 SERVICES FOR STUDENTS WITH DISABILITIES

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	

Services For Students with Disabilities Issues

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and ADA Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function and the able-bodied should not put them in a position where they might be “uncomfortable.” However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services. The Section 504 requirements for services for elementary and secondary disabled students are different from the requirements for services for postsecondary students with disabilities.

Interviews with the following persons may clarify compliance with this standard: Superintendent, Assistant Superintendent, CTE Director, Principals, Guidance Counselors, English Language Learners Director, Human Resources Director, Business Manager, Title IX Director 504 Coordinators, Coordinator for Disabled Student Services, Facilities Director, and Department Chairs. In addition to interviews, a visual inspection of facilities should be conducted.

6.1 SWD Access to Programs

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of disability. <u>Section 504: 34 CFR 104.4(a)</u> <u>Title II: 28 CFR 35.130(a)</u> <u>Guidelines IV-N</u>	The agency implements policies and procedures ensuring access for students with disabilities to programs, services, and activities.	Board policy			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Student handbooks			
		Membership lists in clubs and activities			
		Procedures for selection into clubs, activities, programs			
		Criteria for admission into courses, programs, services, and activities			

Comments

SECTION 6 SERVICES FOR STUDENTS WITH DISABILITIES

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
6.2 Equipment Barriers					
Disabled students must not be excluded from vocational, career, or academic programs, courses, services or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available. <u>Guidelines IV-N</u>	The agency provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities.	Example(s) of equipment adapted			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Description of policy for providing aids and services			
		Description of aids and services available/provided/denied			
		List of materials/resources available for seeing or hearing impaired			
		Enrollment data by program			
		Number of disabled students denied admission			
		Student handbook/catalog			
		Policies governing use of guide dogs, tape recorders, note takers			
		Interviews			
Comments					

SECTION 6 SERVICES FOR STUDENTS WITH DISABILITIES

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
6.3 Evaluation Accommodations & Modifications					
Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes or achievement levels or other relevant factors are measured and not the disability. <u>Section 504: 34 CFR 104.44(c)</u> <u>Title II: 28 CFR 35.130(b)(8)</u> <u>Guidelines IV-N</u>	The agency accommodates needs of students with disabilities during testing.	Lists of modifications to tests or test administration			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Location of testing; facility accessible, auditory/lighting adequate			
		Procedures for determining need			
		Interviews			
	Comments				

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	

504/ADA Accessibility Issues

Recipient may not exclude students with disabilities from enjoying the benefits of its program or service because its facilities are inaccessible to or unusable by persons with disabilities.

Interviews with the following persons may clarify compliance with this standard: Superintendent, Assistant Superintendent, CTE Director, Principals, Guidance Counselors, English Language Learners Director, Human Resources Director, Business Manager, Title IX Director 504 Coordinators, Coordinator for Disabled Student Services, Facilities Director, and Department Chairs. In addition to interviews, a visual inspection of facilities should be conducted. Blueprints. Construction contracts. Work orders.

Applicable accessibility standards are determined by the date the facility was constructed or last renovated by the institution.

- Existing facilities/Section 504 (34 CFR, 104.22) - construction or alteration initiated before 6/4/77 - "Readily Accessible"
- New construction/Section 504 (34 CFR 104.23) - construction or alteration initiated between 6/4/77 and 1/17/91 – ANSI A117.1-1961 (R1971)
- New construction/Section 504 (34 CFR 104.23 - construction or alteration initiated on or after 1/18/91 - UFAS
- New construction/ ADA (28 CFR 35.151) - construction or alteration initiated on or after 1/27/92 - ADAAG or UFAS

List each facility reviewed with the date of construction or last renovation and the vocational programs offered therein.

- Building
- Date
- Programs

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
7.1 Existing facility under 504 – Built or altered beginning June 3, 1977, or earlier					
A recipient shall operate its program or activity so that when each part is viewed in its entirety, it is readily accessible to disabled persons. A recipient is not required to make each of its existing facilities or every part of a facility accessible to and usable by persons with disabilities. <u>Section 504: 34 CFR 104.22</u>	<ul style="list-style-type: none"> • redesign of equipment • reassignment of classes or other services to accessible buildings • assignment of aides to beneficiaries (but no carrying) • home visits • alteration of existing facilities and construction of new facilities in conformance with the requirements for new construction or • any other methods that result in making its program or activity accessible to persons with disabilities 	<ul style="list-style-type: none"> • Observations and measurements 			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		<ul style="list-style-type: none"> • Blueprints and plans (1) • Renovation schedules • Maintenance records (summary) • Work orders or contracts indicating construction start dates (summary of significant alterations, etc.) 			
Comments					

Note: Blueprints are not required. However, please provide simple building plans showing locations of rooms, doors, etc. with original construction dates and significant alteration and remodel dates for each building on or off campus.

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
7.2 New construction under 504 – Built or altered between June 4, 1977, and January 17, 1991, inclusive					
Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the "American National Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, the Physically Disabled," published by the American National Standards Institute, Inc. (ANSI A117.1-1961 (R1971) Later versions of ANSI A117.1 do not apply. <u>Section 504: 34 CFR 104.23</u> (prior to January 18, 1991 amendment)	4.1 Grading	• Observations and measurements			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	4.2 Walks	• Blueprints and plans			
	4.3 Parking lots	• Renovation schedules			
	5.1 Ramps and gradients	• Maintenance records			
	5.2 Entrances	• Work orders or contracts indicating construction start dates			
	5.3 Doors and doorways				
	5.4 Stairs				
	5.5 Floors				
	5.6 Toilet rooms				
	5.7 Water fountains				
	5.8 Public phones				
	5.9 Elevators				
	5.10 Controls				
5.11 Identification					
5.12 Warning signals					
5.13 Hazards					
Comments					

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
7.3 New construction under 504 – Built or altered between January 18, 1991, and January 26, 1992, inclusive New construction under ADA Title II and 504 – Built after January 26, 1992; exercising the option to follow UFAS					
Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the Uniform Federal Accessibility Standards (UFAS) (Appendix A to 41 CFR subpart 101-19.6). Departures from particular technical and scoping requirements permitted where substantially equivalent or greater access to and usability of the building is provided. <u>Section 504: 34 CFR 104.23</u> <u>Title II: 28 CFR 35.151</u>	4.1 Minimum requirements	• Observations and measurements			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	4.2 Space allowance and reach ranges	• Blueprints and plans			
	4.3 Accessible route	• Renovation schedules			
	4.4 Protruding objects	• Maintenance records			
	4.5 Ground and floor surfaces	• Work orders or contracts indicating construction start dates			
	4.6 Parking and passenger loading zones				
	4.7 Curb ramps				
	4.8 Ramps				
	4.9 Stairs				
	4.10 Elevators				
	4.11 Platform lifts				
	4.12 Windows				
	4.13 Doors				
	4.14 Entrances				
	4.15 Drinking fountains and water coolers				
	4.16 Water closets				
	4.17 Toilet stalls				
	4.18 Urinals				
	4.19 Lavatories and mirrors				
	4.20 Bathtubs				
	4.21 Shower stalls				
	4.22 Toilet rooms				
	4.23 Bathrooms, bathing facilities, and shower rooms				
	4.24 Sinks				
	4.25 Storage				
	4.26 Handrails, grab bars, tub and shower seats				
	4.27 Controls and operating mechanisms				
	4.28 Alarms				
	4.29 Tactile warnings				
	4.30 Signage				

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
	4.31 Phones 4.32 Seating, tables, and work surfaces 4.33 Assembly areas 4.34 Dwelling units Other requirements				
Comments					

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
7.4 New construction under ADA Title II and 504 – Built after January 26, 1992; exercising the option to follow ADAAG					
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) (Appendix A to 34 CFR Part 36). Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided.</p> <p><u>Section 504: 34 CFR 104.23</u> <u>Title II: 28 CFR 35.151</u></p>	4.1 Minimum requirements	• Observations and measurements			
	4.2 Space allowance and reach ranges	• Blueprints and plans			
	4.3 Accessible route	• Renovation schedules			
	4.4 Protruding objects	• Maintenance records			
	4.5 Ground and floor surfaces	• Work orders or contracts indicating construction start dates			
	4.6 Parking and passenger loading zones				
	4.7 Curb ramps				
	4.8 Ramps				
	4.9 Stairs				
	4.10 Elevators				
	4.11 Platform lifts (wheelchair lifts)				
	4.12 Windows				
	4.13 Doors				
	4.14 Entrances				
	4.15 Drinking fountains and water coolers				
	4.16 Water closets				
	4.17 Toilet stalls				
	4.18 Urinals				
	4.19 Lavatories and mirrors				
	4.20 Bathtubs				
	4.21 Shower stalls				
	4.22 Toilet rooms				
	4.23 Bathrooms, bathing facilities, and shower rooms				
	4.24 Sinks				
	4.25 Storage				
	4.26 Handrails, grab bars, tub and shower seats				
	4.27 Controls and operating mechanisms				
	4.28 Alarms				
	4.29 Detectable warnings				
	4.30 Signage				
	4.31 Phones				

SECTION 7 ACCESSIBILITY

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
	4.32 Fixed or built-in seating or tables 4.33 Assembly areas 4.34 Automatic teller machines 4.35 Dressing and fitting rooms Other requirements				
Comments					

SECTION 8 COMPARABLE FACILITIES

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	

Comparable Facilities Issues

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female or students with disabilities should be located in similar proximity to the associated classrooms, shops or laboratories.

8.1 Separate Comparable Facilities

If separate programs or facilities exist for students with disabilities, they are comparable to those for students without disabilities. <u>Section 504: 34 CFR 104.34(c) Guidelines VI-A</u>	Facilities are comparable.	Review of facilities			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	Programs are comparable.	Comparison of programs and services offered to both students with disabilities and students without disabilities			
	Services are comparable.				
	Comments				

SECTION 8 COMPARABLE FACILITIES

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
8.2 Changing Rooms & Showers					
<p>Changing rooms, showers, and other facilities for students of one sex are comparable to those provided to students of the other sex.</p> <p>Changing rooms, showers, and other facilities for students with disabilities are comparable to those provided to students without disabilities.</p> <p><u>Title IX: 34 CFR 106.33</u> <u>Section 504: 34 CFR 104.4(b)(ii)</u> <u>Guidelines VI-D</u></p>	<p>Locker rooms have approximately the same space and amenities for both males and females.</p> <p>If there is disparity, the institution provides a legitimate, nondiscriminatory rationale.</p> <p>Changing rooms, shower, bathrooms, and other facilities near the vocational areas are comparable for both men and women.</p> <p>Persons with disabilities have convenient access to changing facilities and shower facilities.</p>	Visual examination of the facilities			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with students			
		Interviews with staff			
Comments					

SECTION 9 WORK STUDY COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICESHIP TRAINING PROGRAM

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
Work Study Cooperative Education, Job Placement, and Apprentice Training Program Issues					
<p>An agency, school or district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment, workplace learning sites or apprenticeship training programs. In the same way that an employer may not discriminate and the educational agency may not work with any that do discriminate, it also has the responsibility to ensure that entities sponsoring apprenticeship programs such as unions do not discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin, or disability of the student. It is also illegal to cooperate with an employer or apprenticeship program that requests students on the basis of sex, race, color, national origin or disability status. It is recommended that agencies, schools, districts and apprenticeship programs have written agreements whereby the cooperating worksite and apprenticeship program indicates that they will not discriminate and that they understand the school or district will not work with any business or apprenticeship program that does. It is necessary to review these written agreements, the assignments of students presently in such programs and the placement process to see whether any such patterns exist.</p>					
9.1 Work Study & Job Placement					
<p>Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.31(d)</u> <u>Section 504: 34 CFR 104.4(b)</u> <u>Guidelines VII-A</u></p>	<p>Students in the work-study, cooperative education and job placement programs are representative of the demographics of the school or program.</p> <p>If there is disparity, the institution provides a legitimate, nondiscriminatory rationale.</p>	Review of enrollment data in the work-study, cooperative education, and job placement programs			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with students			
		Interviews with staff			
Comments					

SECTION 9 WORK STUDY COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICESHIP TRAINING PROGRAM

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
9.2 Employer Agreements					
A recipient that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and pay. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.38</u> <u>Section 504: 34 CFR 104.46(b)</u> <u>Guidelines VII-A</u>	Workplace agreements contain an assurance of non-discrimination that is signed by both the employer and the agency. The recipient does not honor any employer's requests for students who are free of disabilities or for students of a particular race,	Review of workplace assignments, hours of work, and job assignments			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Interviews with students			
		Interviews with staff			
Comments					

SECTION 9 WORK STUDY COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICESHIP TRAINING PROGRAM

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	
9.3 Apprenticeship Agreements					
Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. <u>Title VI: 34 CFR 100.3(c)</u> <u>Title IX: 34 CFR 106.31(d)</u> <u>Section 504: 34 CFR 104.11(a)(4)</u> <u>Guidelines VII-A</u>	Verification that staff understands this requirement.	Policy or written procedure			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	Verification that the staff has not honored any request.	Interview with students			
		Interview with staff			
	Verification that the staff has not honored any request.	Interview with sponsors of apprenticeship programs			
Comments					
A written agreement between the institution and the labor union or other sponsor includes an assurance of nondiscrimination on the basis of race, color, national origin, sex, or disability. <u>Guidelines VII-A</u>	Written agreement between apprenticeship program and the agency contains the nondiscrimination statement that is signed by both parties.	Review of the written agreement			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
	Comments				

SECTION 10 EMPLOYMENT

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	

Employment Issues

Recipients are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

Suggested Persons to Interview: Personnel Director/Human Resources Director/Human Director, Recruiters or Personnel Staffing Specialists, Affirmative Action Officer, Top Managers, Members of Recruitment and Selection Teams or Committees, Recent Hires, Union Officers or Negotiators, staff who are members of protected groups.

10.1 Employment Practices

<p>Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or disability. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion, or other discrimination against students.</p> <p>Recipients may not make pre-employment inquiries concerning disability, marital, or parental status. <u>Title VI: 34 CFR 100.3(c)</u> <u>Title IX: 34 CFR 106.51, 106.57, and 106.60</u> <u>Section 504: 34 CFR 104.13 and 104.14</u> Guidelines VIII-A</p>	<p>Recipient's employment practices are conducted without regard to race, color, national origin, sex, or disability of applicants or employees.</p> <p>Application forms and materials are free from prohibited questions concerning disability or marital or parental status.</p>	Employment practices documents including:			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		hiring policies and procedures			
		advancement policies and procedures			
		employee handbooks			
		application materials and forms			
		screening committee policies and procedures			
		rating systems			
		job announcements			
recruitment policies					
		Interviews with HR Director and staff			
Comments					

SECTION 10 EMPLOYMENT

Equity Requirement/ <u>Legal Cites</u>	Indicators of Compliance	Documentation			Status
			Yes	No	
10.2 Employment Recruitment Notification					
	Agency notifies its sources of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.	Application form for employment			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Vacancy announcements and advertisements			
		Recruitment letters or contacts			
		Personnel web site and other related recruitment documents			
		Published nondiscrimination statement in newspapers, student handbooks, other materials			
Comments					

SECTION 10 EMPLOYMENT

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	

10.3 Salary Scales & Assignments

<p>The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability. <u>Title IX: 34 CFR 106.54</u> <u>Section 504: 34 CFR 104.11 and 12</u> <u>Guidelines VIII-D</u></p>	<p>Faculty salary scales and policy are based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.</p>	<p>Faculty salary schedules and related policies</p>			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		<p>Faculty assignment patterns are nondiscriminatory on the basis of race, color, national origin, sex, or disability.</p>	<p>Faculty assignment information by race/ethnic group, sex, and disabled staff</p>		
		<p>Non-faculty salary administration is based upon the conditions of employment without regard to race, color, national origin, sex, or disability.</p>	<p>A non-faculty classification/compensation system is in place that evaluates jobs and places them in appropriate salary ranges according to working conditions and levels of employment responsibility</p>		

Comments

SECTION 10 EMPLOYMENT

Equity Requirement/ Legal Cites	Indicators of Compliance	Documentation			Status
			Yes	No	

10.4 Equal Opportunities & Reasonable Accommodations

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitations of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship. <u>Section 504: 34 CFR 104.12 Guidelines VIII-E</u>	Recipient's employment policies do not unlawfully discriminate against people with disabilities. Persons with disabilities are employed in teaching and administrative positions and are not treated differently in promotion and tenure decisions.	Number of disabled staff			<input type="checkbox"/> Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/> N/A
		Copies/description of policies, procedures, and criteria considered for hiring, promotion, retention, and tenure including professional and non-professional applications			
		Interviews with staff			

Comments