

Ohio Department of Education  
Office of Career-Technical Education  
**Methods of Administration Plan**  
Beginning Academic Year 2020-2021

## Section 1: Introductory Information

The State Board of Education has the primary responsibility for the development, administration and management of the Methods of Administration program. The Ohio Department of Education is the State of Ohio's official educational agency. The development and implementation of the Methods of Administration plan, as required under Guidelines (44 Federal Register 17162, March 21, 1979) issued by the Office of Civil Rights and the Feb. 6, 2020, Memorandum of Procedures issued jointly by the Office of Civil Rights and the Office of Career, Technical and Adult Education, will be implemented through the Ohio Department of Education's Office of Career-Technical Education.

Several groups and organizations participated as stakeholders in developing the state plan for the Methods of Administration program in Ohio. The following stakeholders had the opportunity to review and offer their comments or suggestions on the state of Ohio's plan prior to the submission to the Office of Civil Rights:

- Ohio Department of Education: Office of Legal Counsel; Families of Veterans Program; English Learners Ohio Program
- Ohio Department of Higher Education
- Coalition on Homeless and Housing in Ohio
- Ohio Department of Job and Family Services, Bureau of Civil Rights
- Tri-Star Compact School District
- Lima City School District
- Columbus City School District
- Tolles Joint Vocational School District
- Warren County Joint Vocational School District
- Mahoning County Educational Service Center
- Youngstown City School District
- Clark State Community College

### STAFF RESOURCES

Staff Member and Title	FTE
Michelle Ward, Methods of Administration Coordinator	.50
Rebecca Crance, Equity Program Administrator, Office of Career-Technical Education	.20
Jonathan Beard, Assistant Director, Office of Career-Technical Education	.05
<b>Total FTE</b>	<b>.75</b>

## Section 2: Plan for Performing Oversight Responsibilities

Ohio's selection of subrecipients for review is based on guidance provided by the Office of Career, Technical and Adult Education and the Office of Civil Rights. It is designed to assure broader coverage of the identified pool of subrecipients by using enrollment data, Perkins performance data and other civil rights information to identify those most at risk for noncompliance.

Career-Technical Planning Districts, secondary community schools (charter schools), traditional school districts, community colleges, adult training centers and state-operated programs all provide career-technical education and receive federal financial assistance in Ohio. Ohio will focus its reviews on secondary schools (including Career-Technical Planning Districts, traditional districts and charter schools), adult training centers, community colleges and state-operated programs. Because the size of some Career-Technical Planning Districts and traditional districts varies between one and more than 30 different building locations, Ohio will identify each secondary building location that houses career-technical education and receives federal funding as a separate subrecipient. Community colleges, adult training centers and state-operated programs will be identified as individual subrecipients for the purposes of selection for review. The subrecipient selection will follow a three-year rotation, with each subrecipient assigned a year for risk analysis and potential desk and on-site reviews.

The design of Ohio's review selection process is not tied directly to any other monitoring or accreditation cycle. If it is discovered that civil rights on-site monitoring will coincide with another on-site monitoring process, the local administration may request special dispensation, and the Methods of Administration coordinator will consider adjusting the visitation dates to accommodate the local calendar to the extent possible. The period of adjustment, however, will be limited to the school year in which the subrecipient is eligible and may not be moved to the next school year.

### PURPOSE OF THE REVIEW PROCESS

The purpose of reviewing institutions that offer career-technical education is to ensure all students, regardless of race, color, national origin, sex or disability, have equal access and opportunities to succeed in career-technical programs.

Ohio will use a three-level approach for oversight, including desk reviews, on-site reviews and technical assistance. In the first level, data analysis of race, sex and disability will be used to select a percentage of subrecipients for further analysis and oversight through desk reviews. The second level utilizes risk assessment to select recipients for on-site reviews, which will broaden the scope of the review process by adding an accessibility tour and comprehensive interviews. The on-site reviews also serve as checks on the accuracy and completeness of the information gleaned through desk reviews and data analyses. The final level is technical assistance, which will be offered in a variety of approaches to **all** subrecipients at every step in the process, regardless of whether they are receiving desk reviews, on-site reviews or no reviews at all.

### SUBRECIPIENT UNIVERSE

The subrecipient universe will be divided into three distinct categories that represent the different delivery systems — secondary (by individual building location), community colleges/adult training centers and state-operated programs — for career-technical education in Ohio. As of June 1, 2020, the pool of subrecipients offering career-technical programs and receiving federal financial assistance is approximately 691 secondary building locations, 76 community colleges/adult training centers and 30 state-operated programs, for a total of 797 subrecipients.

## SELECTION CRITERIA AND PROCESS

Data from Ohio's Education Management Information System and the Higher Education Information System will be obtained from the most recent year available to conduct the analysis for the selection process. The data will be used to select building locations, community colleges and adult training centers from the current year's pool of subrecipients based on the percent difference when comparing career-technical education enrollment of minorities, gender and students with disabilities to that of an institution's overall enrollment for similar populations. Since data are not available to make comparisons about enrollment inequities for state-operated programs, selection for review will be by lottery.

In accordance with directives from the Office of Civil Rights, subrecipients that receive federal financial aid, of any type, and offer career-technical education programs must be evaluated by means of a review on a regular basis. Ohio's plan for selecting subrecipients that shall receive a review meets the expectations as outlined by the Office of Civil Rights in each year of the three-year rotation of the selection plan. Using the data as calculated on June 1, 2020, the number of targeted technical assistance desk reviews will be approximately 23-26, and the number of comprehensive on-site reviews will be two to three, depending upon the year of the plan. This number of reviews represents a significant increase in the number of institutions receiving oversight and targeted technical assistance in Ohio, which has averaged four on-site-only reviews annually in the last 20 years.

Any school district, community college, adult training center or state-operated program that has received a review within the last six calendar years will be excluded from eligibility for a review.

## SECONDARY SCHOOL BUILDING LOCATIONS

The review selection plan for secondary institutions will be on a three-year rotation, with approximately 691 locations in the subrecipient pool each year. Using race, gender and disability data extracted from the Education Management Information System, 10% of building locations will be selected for review, which is approximately 23 each year. These 23 locations will be required to complete survey-style desk reviews. The desk reviews will drive improvements in all 23 locations, with the Methods of Administration coordinator and Ohio's career-technical education department providing technical assistance to assist districts in developing plans for improvement. In addition to the desk reviews, 10%, or approximately two of those selected for desk reviews, will receive full on-site reviews from the Methods of Administration coordinator and civil rights review team.

## COMMUNITY COLLEGES AND ADULT TRAINING CENTERS

There are 23 community colleges and 53 adult training centers in Ohio as of June 1, 2020, that meet the definition of a subrecipient. These postsecondary institutions provide career-technical education programs and receive federal funding from the United States Department of Education, making them eligible for civil rights monitoring. Some of Ohio's community colleges and adult training centers are comprised of multiple campuses or have expanded programming at satellite locations. If a selected community college or adult training center operates at multiple locations, all locations that offer career-technical programming will be reviewed.

The targeting plan for community colleges and adult training centers will be included in year two of the three-year rotation. The selection process will identify 10%, approximately seven subrecipients, based upon race, gender and disability data reported in the Higher Education Information system. The 10% of community colleges and adult training center subrecipients identified will be asked to complete survey-style desk reviews. This desk reviews will drive improvement in all selected subrecipients, with the Methods of Administration coordinator, Ohio Department of Higher Education and Ohio Department of Education's career-technical education department providing targeted technical assistance to support subrecipients in developing plans for improvement. In addition to the desk reviews, 10% of those selected for desk reviews, or a minimum of one, will receive a full on-site review from the Methods of Administration coordinator and civil rights review team.

## STATE-OPERATED PROGRAMS

Inmates in Ohio are served by one of two school districts assigned to the adult and juvenile correctional systems. For incarcerated adults, career-technical programs are operated by the Ohio Central School System, a component of the Ohio Department of Rehabilitation and Corrections. As of June 1, 2020, career-technical education is provided at 28 different institutions throughout the state. Youths are served by the Buckeye United School System as part of the Ohio Department of Youth Services, with career-technical programs located at three institutions. Both the adult and juvenile facilities will be combined with the Ohio State School for the Blind and Ohio School for the Deaf to create the state-operated programs subrecipient pool.

The targeting plan for state-operated programs will be included in year three of the three-year rotation. There is no data that will support a targeted identification process, so a lottery will define 10%, or approximately three subrecipients, that will be asked to complete survey-style desk reviews. The desk reviews will drive improvements in all identified subrecipients, and the Methods of Administration coordinator and Ohio's career-technical education department will provide targeted technical assistance.

## RATIONALE FOR STATE FOCUS

Ohio will be reviewing all eligible subrecipients that have career-technical education programming and receive federal funding, with the following two limitations:

First, monitoring below the secondary level will not be conducted as most middle or elementary schools have very limited programming and adding these institutions to the pool would result in a dilution of focus on locations that have larger numbers of career-technical education students. By not including middle school locations, the likelihood that locations with more extensive career-technical education offerings and students will be selected is increased.

Second, a full, on-site monitoring review will not be conducted for state-operated programs, as this activity has not proven to be effective in regard to accessibility or interviewing. Desk reviews and technical assistance will be provided for state-operated programs, and on-site reviews will be conducted upon request.

The rotation will be defined as follows:

### Year One (2020-2021)

In year one, the pool for potential desk and on-site reviews will include approximately one-third of the secondary school district building locations.

### Year Two (2021-2022)

In year two, the pool for potential desk and on-site reviews will include approximately one-third of the secondary school district building locations. Community colleges and adult training centers will be evaluated in a separate pool for potential desk and on-site reviews.

### Year Three (2022-2023)

In year three, the pool for potential desk and on-site reviews will include approximately one-third of the secondary school district building locations. State-operated programs will be evaluated in a separate pool for selection to receive a desk review in this year.

***Subsequent years will repeat the schedule until such time as this plan is revised.***

**RANKING PROCEDURES FOR DESK REVIEW**

Data collected from Ohio's Educational Management Information System and the Higher Education Information System will be used to determine the selected secondary building locations, community colleges and adult training centers where there may be the most potential for civil rights violations. This will be determined by a system that ranks the differential in enrollment between the students in career-technical programs and the subrecipient's overall enrollment. The data will determine the percentage difference between the two sets of data, and the resulting difference will be assigned a numerical rank.

**GENDER**

The percentage of females served by students at a building location will be compared to the percentage of females enrolled in career-technical programs in the district or districts associated with the building. The percentage of females enrolled in a community college or adult training center will be compared to the percentage of females enrolled in career-technical programs. A point value will be applied to the percent difference range.

Range of % Difference	Points
0 – 5	1
6 - 10	2
11 - 20	3
21 - 30	4
31 - 40	5
41 - 50	6
51 - 60	7
61 and above	8

**MINORITY**

The percentage of minority students served at a building location will be compared to the number of minority students enrolled in career-technical programs in the district or districts associated with the building. The percentage of minority students enrolled in a community college or adult training center will be compared to the percentage of minority students enrolled in career-technical programs. A point value will be applied to the percent difference range.

Range of % Difference	Points
0 - 5	1
6 - 10	2
11 - 20	3
21 - 30	4
31 - 40	5
41 - 50	6
51 - 60	7
61 and above	8

**STUDENTS WITH DISABILITIES**

The percentage of students with disabilities served at a building location will be compared to the number of students with disabilities enrolled in career-technical programs in the district or districts associated with the building. The percentage of students with disabilities enrolled in a community college or adult training center will be compared to the percentage of students with disabilities enrolled in career-technical programs. A point value will be applied to the percent difference range.

Range of % Difference	Points
0 - 5	1
6 - 10	2
11 - 20	3
21 - 30	4
31 - 40	5
41 - 50	6
51 - 60	7
61 - 70	8
71 and above	9

**RANKING PROCEDURES FOR A FULL ON-SITE REVIEW**

Ohio will select at least 10% of those selected for desk reviews to receive additional comprehensive on-site reviews. For each of the categories — secondary building locations, community colleges and adult training centers — a risk assessment ranking that expands to include Perkins data and other sources of information will be employed. A point value will be applied as follows:

Criteria	Point
Initial ranking for desk review is 1-3 points	1
Initial ranking for desk review is 4 points or higher	2
One subgroup ≥ .5% (homeless, military, English learners)	3
More than one subgroup ≥ .5% (homeless, military, English Learners)	5
Did not meet at least 90% of any single Perkins performance target	2
Did not meet at least 90% of two or more Perkins performance targets	4
Survey received late or incomplete	5
Survey not received or more than 10 calendar days late	Consequential Selection

**BREAKING A TIE**

Should the ranking result in a tie, the date of the last review will be examined using the longest duration since the last visit as the determining factor. If a tie still exists, the subrecipient with the largest number of career-technical education participants will be chosen.

**EXTENUATING CIRCUMSTANCES**

If a selected subrecipient has experienced a catastrophic event such as an environmental disaster that caused significant damage to the facility or the facility currently is undergoing major construction, the next subrecipient on the ranked list will be selected. Such action will be communicated to the Office of Civil Rights and noted in the biennial report.



## ANNUAL REVIEW PROCESS

A detailed annual review process will be posted on the Ohio Department of Education website and published in a Local Coordinator Manual. The following basic outline illustrates key components of the process:

1. The Methods of Administration coordinator will request data reports and conduct analysis needed for selection of the subrecipients that will be receiving desk reviews (race, gender and disability).
2. Subrecipients selected for desk review will be notified and provided with desk review questions and document requests. The subrecipient will have a deadline for submission of 30 calendar days from notification to answer the questions and provide any requested evidence.
3. The Methods of Administration coordinator will conduct a desk review using the response from the subrecipient, ascertaining where there are findings or additional information is required.
4. Subrecipients receiving desk reviews then are assigned point scores based on analyses of information on race, gender and disability, Perkins data, and additional data on subgroups as outlined in the ranking procedures.
5. Subrecipients that are selected for comprehensive on-site reviews are notified of the date of the review and offered additional technical assistance.
6. Subrecipients not selected for on-site reviews are provided with letters of findings within 60 calendar days of the desk review deadline for submission date.
7. On-site reviews are conducted.
8. Subrecipients who received on-site reviews receive letters of finding within 30 days of the last day of their conducted on-site reviews.
9. All subrecipients reviewed (desk or on-site) complete voluntary compliance plans if there are findings. The subrecipient will have 30 calendar days from the date of the letter of findings to submit a voluntary compliance plan.
10. The Methods of Administration coordinator reviews and approves the voluntary compliance plans within 30 calendar days of sending the letter of findings. If not approvable, the plan will be returned to the subrecipient, which then has 15 days to make the necessary revisions and resubmit.
11. Evidence of completion of the negotiated corrections is submitted to the Methods of Administration coordinator on or before the negotiated date in the voluntary compliance plan.
12. The Methods of Administration coordinator checks the submitted evidence and validates that all negotiated corrections are executed. The review process is complete.

## DESK REVIEW SURVEY SAMPLE QUESTIONS

Questions or requests for information for the desk audit survey may change from year to year as the state determines its focus for review. For the purpose of illustration, the following are examples of the type of questions or document requests that may be tendered in a desk survey:

1. Subrecipients must comply with the requirement to provide both annual and continuous notice. Please send a copy of both your annual and continuous notices, including photo evidence of the location where they are posted.
2. Section 504 and Title IX coordinator(s) must receive adequate initial and ongoing training in the completion of their duties. Please send purchase orders, meeting agendas or other evidence of all completed training for the last three years for your Title IX and 504 coordinator(s).
3. Please send copies of the district's sexual harassment and discrimination policies, along with evidence of where they are posted or available for students and the public to view them. Include a copy of the board minutes showing when the policies were board approved.
4. Provide a breakdown of staff demographics, including all staff, the position each person holds, race, gender and disability.

5. Please provide a copy of your admissions process, along with a brief description of where it may be found by prospective students and the public. Include a description of all criteria for program selection and a description of the process used when programs are oversubscribed. Please include information on whether the district uses, either officially or unofficially, any selection criteria such as prerequisites, essays, interviews, grades, attendance or other criteria for admission into career-technical education programs.
6. Provide a sample copy of the following documents:
  - Marketing materials;
  - Work agreement for placement;
  - Program application.
7. Briefly describe any special services or accommodations provided in the past or available for the following:
  - English language learners;
  - Students who have disabilities (for example, deaf, blind, mobility);
  - Students who are homeless;
  - Students who are members of a significant subgroup population in your service area (for example, Hispanic, Somalian, Korean);
  - Students who are part of military families;
  - Students who are in foster care.

***If selected for an on-site review, additional information may be requested by the Methods of Administration coordinator.***

### **Section 3: Technical Assistance**

Technical assistance for subrecipients will be provided by a team that includes the Methods of Administration coordinator, Equity program consultant and other staff within the Office of Career-Technical Education or Ohio Department of Education. Ohio values the support and technical assistance provided by the Office of Career, Technical and Adult Education and Office of Civil Rights and will include resources they have provided as a part of the comprehensive technical assistance plan strategy.

Specific activities related to technical assistance may be modified from year to year as changing needs or focus are identified and addressed. For the purpose of illustration, the following examples of technical assistance were provided or will be provided in the 2019-2020 and 2020-2021 school years:

#### **Technical assistance provided by the Methods of Administration coordinator:**

1. Civil rights process and on-site review orientations
2. Website resources page
3. A comprehensive guidelines manual for local coordinators
4. Published written processes
5. Voluntary Americans with Disabilities Act or policy reviews upon request
6. Topical speaking engagements
7. Video tutorials
8. In-person or virtual consultations upon request
9. Methods of Administration coordinator-conducted seminars and training



**Technical assistance provided for the MOA coordinator or subrecipient by the Office of Civil Rights:**

1. Office of Civil Rights reading room materials and resources
2. Office of Civil Rights website
3. National training conference for Methods of Administration coordinators
4. Assistance with technical questions
5. Feedback on state reports
6. Seminars and training (collaboration between the Methods of Administration coordinator and Office of Civil Rights)

**Technical assistance provided by the Equity program consultant (Perkins):**

1. The Equity Ambassador Program — Participating Career-Technical Planning Districts will designate ambassadors who will act as local equity support and subject matter experts for career-technical education. These individuals will be certified through completion of the Equity Ambassador online course in the Learning Management System. The equity ambassadors will be invited to participate in professional development for Culturally Responsive Practices.
2. An Equity Newsletter.
3. Equity Labs — Hands-on training will be delivered throughout the state in a workshop format and will provide a deeper dive into equitable education practices in the career-technical education environment. There will be a focus on equitable access to career-technical education and Culturally Responsive Practices as an effective instructional strategy in improving equity in the classroom.
4. Equity for Each: Advanced Approaches for Improving Equity in Career-technical Education Grant — This grant will assist applicants and the Ohio Department of Education in identifying and promoting promising best practices for equity in career-technical education delivery. The grant will prioritize applications that include collaboration between secondary and postsecondary partners, with strategies that focus on the promotion or expansion of programs of study aligned with state-identified high-skill, high-wage or in-demand jobs. Additionally, the grant will support local recipients in the ongoing development and alignment of local data collection systems to improve data-driven decision-making and strategic planning regarding special populations and subgroups.

**Technical assistance provided by Perkins program consultants and Methods of Administration coordinator:**

1. Program consultants will receive training courses from the Methods of Administration coordinator on spotting civil rights issues while conducting site visits as part of their regularly scheduled duties. When issues are identified, they will provide basic support to the subrecipient or refer the subrecipient to the Methods of Administration coordinator for further technical assistance.

## Sanctions Policy

All applicants for grants, loans and contracts; property; discounts; other federal financial assistance from the United States Department of Education; or funds made available through the United States Department of Education are required to submit an assurance of compliance with laws and regulations related to Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; and the Boy Scouts of America Equal Access Act of 2001. By signing the assurance, the applicant acknowledges that compliance with the assurance constitutes a condition of continued receipt of federal financial assistance from or funds made available through the United States Department of Education. In the event of a failure to comply, the funds may be terminated, and the applicant may be denied the right to receive further assistance or funds.

A subrecipient of federal financial assistance is subject to the requirements of this assurance. Violation findings and required corrective actions in the Ohio Department of Education's letter of findings for subrecipients relating to violations of Title VI, Title IX and Section 504 that continue uncorrected per the letter of findings and/or the submitted voluntary compliance plan may result in a district being deemed out of compliance with these laws and, therefore, out of compliance with its assurance. Based on this failure to comply, any federal financial assistance it receives from the United States Department of Education could be terminated.

Subrecipients that are out of compliance with civil rights law but are in good standing with the timely completion of activities in the civil rights process as defined in the Local Coordinator's Manual are not subject to sanctions. The following state actions shall be taken if a subrecipient is out of compliance with the civil rights process, including failure to submit required documentation per the guidelines in the Local Coordinator's Manual or failure to submit evidence per the agreed-upon actions in the voluntary compliance plan:

1. **Hold on Perkins funding** - Documentation or evidence is missing or more than **30 days** late. Perkins funds will be placed on hold for disbursement until the subrecipient is in compliance with the guidelines in the Local Coordinator's Manual.
2. **Hold on career-technical education program approvals and renewals** - Documentation or evidence is missing or more than **60 days** late. New programming approval and renewals of existing programming shall not occur until the subrecipient is in compliance with the guidelines in the Local Coordinator's Manual (secondary subrecipients and state-operated programs only).
3. **Referral to the Office of Civil Rights, United States Department of Education** - Documentation or evidence is missing or more than **90 days** late. The hold on Perkins funding (1) and career-technical education new program approvals and renewals (2) will remain in effect until the subrecipient is in compliance. In addition, the Office of Civil Rights will be notified regarding the subrecipient's noncompliance with the civil rights process.

An extension of deadlines or other requirements may be granted in extenuating circumstances. Examples of extenuating circumstances include an environmental disaster, epidemic, fire or other circumstances **outside of the control of the subrecipient**. The Methods of Administration coordinator will be the decision-maker with regard to any extensions.