

Civil Rights Review: 2024 Local Coordinator's Manual



Ohio Department of Education and
Workforce

Office of Career-Technical Education

May 2024



**Department of
Education &
Workforce**

Table of Contents

- TABLE OF CONTENTS 1**
- METHODS OF ADMINISTRATION OVERVIEW 2**
- CIVIL RIGHTS LEGISLATION 3**
- LOCAL COORDINATOR ASSIGNMENT 4**
- CIVIL RIGHTS REVIEW PROCESS 4**
- VIRTUAL ORIENTATION 4**
- DESK REVIEW 4**
 - Local Coordinator Responsibilities for Desk Review 5*
- ON-SITE COMPREHENSIVE REVIEW 7**
 - Local Coordinator’s Responsibilities for On-Site Review 7*
- LETTER OF FINDINGS 11**
- VOLUNTARY COMPLIANCE PLAN 12**
- EVIDENCE OF COMPLETION 13**
- APPENDICES 14**
 - Local Coordinator Checklist 14*
 - Facilities Building Information 15*
 - Facility Review 17*
 - Parking Information 18*

Methods of Administration Overview

The Ohio Department of Education and Workforce, Office of Career-Technical Education, is the agency and office responsible for the administration of career-technical education. The Department is required to adopt a compliance program to prevent, identify and remedy discrimination on the basis of race, color, national origin, sex, disability or age by subrecipients. A “subrecipient” in this context is a local educational agency, postsecondary institution, or state operated educational program that provides career-technical education programming and receives federal financial assistance through the Department. The State Board of Education has the primary responsibility for the development, administration and management of the civil rights review process, also known as the Methods of Administration program.

The purpose of the Methods of Administration program is to ensure that all students, regardless of race, color, national origin, sex, or disability, have equal access to high-quality career-technical education programs. Activities of the civil rights review are required by Section II(b) of the [*Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Disability*](#), Federal Register, Vol. 44, No. 56, page 17165, issued Wednesday, March 21, 1979.

Compliance with Federal Law

The Ohio Department of Education and Workforce complies with all federal laws and regulations prohibiting discrimination and with all requirements and regulations of the United States Department of Education. It is the policy of the Ohio Department of Education that no person on the basis of race, color, religion, national origin or ancestry, age, gender/sex, height, weight, marital status, or disability shall be subjected to discrimination in any program, service, or activity for which it is responsible or for which it receives financial assistance from the United States Department of Education.

METHODS OF ADMINISTRATION COORDINATOR

Becky Crance, Rebecca.Crance@education.ohio.gov

Ohio Department of Education and Workforce
Office of Career-Technical Education
25 South Front Street
Columbus, Ohio 43215

Civil Rights Legislation

Title VI of the Civil Rights Act of 1964

“No person in the United States shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving Federal financial assistance.” (34 CFR, §103.3)

Title IX of the Education Amendments of 1972

“No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” (34 CFR, §106)

Section 504 of the Rehabilitation Act of 1973

“No otherwise-qualified individual with a disability in the United States, shall, solely by reason of his or her disability, as defined in section 706(8) of this title, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance...” (29 U.S.C. §794(b))

Title II of the Americans with Disabilities Act of 1990 (ADA)

“No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.” (§35.130)

The Age Discrimination Act of 1976

“No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.” (42 U.S.C. § 6102 (1975))

The 1979 Guidelines for Vocational Education

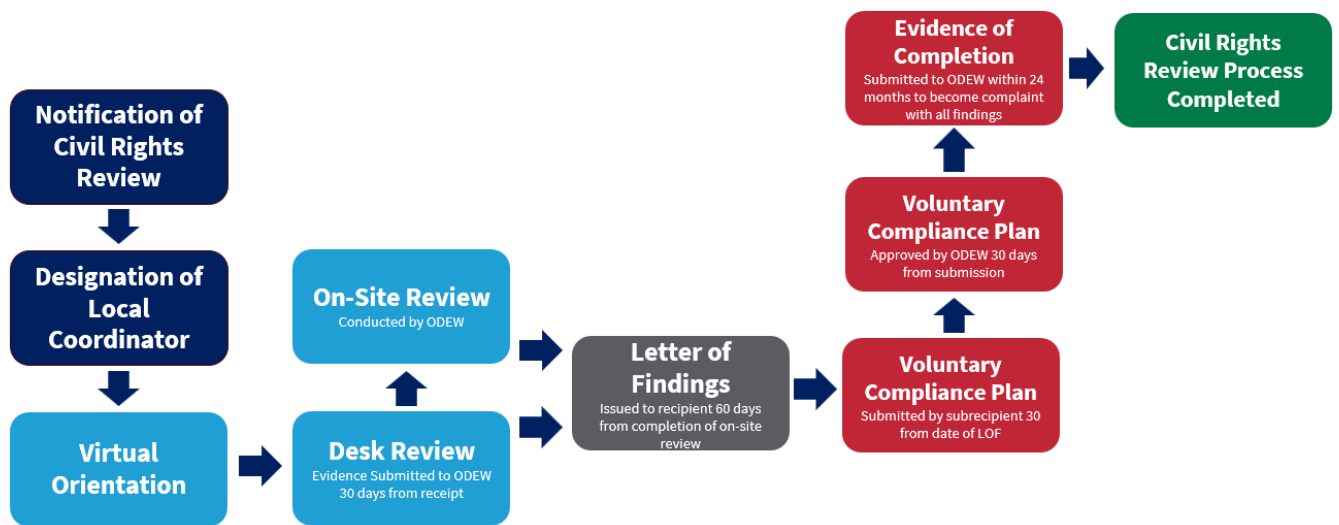
The 1979 Guidelines explain how civil rights laws and Department regulations apply to vocational education programs. They were issued as a result of injunctive orders entered by the United States District Court for the District of Columbia in *Adams v. Califano*. They were also issued because the Department found evidence of continuing unlawful discrimination in vocational education programs.

Local Coordinator Assignment

The local coordinator for each subrecipient is responsible for preparations for all parts of the civil rights review process.

The process from notification to closure of the on-site review can be lengthy. If an alternate person is assigned as the Local Coordinator, please notify the MOA Coordinator immediately. This will ensure continuity throughout the process and allow for a timely conclusion of the review.

Civil Rights Review Process



Virtual Orientation

A virtual orientation will be scheduled for each Local Coordinator of selected subrecipients. The orientation will discuss the civil rights review overview, process and allow Local Coordinator's time to ask questions. After the orientation has been completed, the Local Coordinator will receive the desk review survey.

Desk Review

The Local Coordinator will complete a desk review survey and return it with requested evidence electronically to the MOA Coordinator within 30 days.

Hard copies of documents, handbooks and other materials will not be accepted by mail.

Labels	Document or Link to Live Document
	Example(s) of annual public notification of CTE opportunities written in a language or media other than English, if applicable.
Exhibit D: Accommodations for Persons with Disabilities	<u>Aural Deliveries</u> <ul style="list-style-type: none"> • Examples include: • List of available qualified interpreters • List of qualified note takers • Availability of transcription services • Written materials • Telephone handset amplifiers (public telephones) • Assistive listening devices • Assistive listening systems • Telephone(s) compatible with hearing aids • Closed-caption decoders • Open-and closed-captioning • Telecommunications devices for deaf persons (TDYs), relay system • Videotext displays • Other effective methods of making aurally delivered materials available
Exhibit E: Promotional Activities (English Language Learners [ELL])	<p>Examples of CTE/agency promotional literature designed for national origin minority persons and distributed in their native language:</p> <ul style="list-style-type: none"> • Electronically scanned Brochures • Electronically scanned Pamphlets • Photographs of Bulletins • Memoranda <p>Examples or descriptions of special materials used to recruit students who are English language learners:</p> <ul style="list-style-type: none"> • Photographs of Posters • Photographs of Displays • Photographs of Bulletin boards <p>List of language-related support services provided for ELL students.</p>
Exhibit F: Recipient Responsibilities	<p>Description of the CTE pre-enrollment counseling given students. List activities.</p> <p>Description of steps taken to provide students of all races, both genders/sexes and with disabilities with information concerning CTE programs and career options.</p> <p>Examples of materials used for career counseling and program selection, including catalogs, career or job descriptions, etc.</p> <p>Description of CTE program application process including criteria for selection of students.</p> <p>Policies regarding CTE program enrollment and admission criteria.</p> <p>Examples of materials used for recruitment/enrollment efforts:</p> <ul style="list-style-type: none"> • Electronically scanned Brochures • Photographs of Posters • Electronically scanned Pamphlets

Labels	Document or Link to Live Document
	<ul style="list-style-type: none"> • memoranda • Photographs of displays or bulletin boards <p>Description of promotional efforts such as career days, parents’ night, assemblies, demonstrations, visitations by groups of prospective students, etc.</p>
Exhibit G: Cooperative Education, Job Placement, Apprenticeship Training Responsibilities and Other Worksite Based Documents	<p>Number of students in cooperative CTE and job placement programs by race/ethnic group, gender/sex and disability.</p> <p>For application and participation in each program, provide copies or descriptions of all:</p> <ul style="list-style-type: none"> • policies • criteria for admission • written procedures • application forms • Work-based learning agreements <p>Examples of written agreements with labor unions or other sponsors of apprenticeship training programs.</p>
Exhibit H: (Postsecondary ONLY)	<p>Institutional data on the distribution of student financial aid indicating awards by gender, race, color, national origin and disability.</p> <p>Information/materials related to the availability and application process for financial aid</p> <p>Blank application form(s) for financial assistance</p> <p>If applicable, sample application, informational materials, etc. published in a language other than English</p>
Exhibit I: (Postsecondary ONLY)	<p>Student housing resident demographic data, including residents by race, national origin, disability and sex</p> <p>Student housing handbook or rules/policies</p>
Exhibit J:	<p>District or institution employment policies, application forms and postings. Faculty and staff demographic information.</p>

On-Site Comprehensive Review

Local Coordinator’s Responsibilities for On-Site Review

STAFF NOTIFICATION

The Local Coordinator is required to notify all staff at the building, college, agency or institution that an on-site civil rights review will be conducted. If possible, the local coordinator should arrange in advance for the civil rights team to receive the appropriate security clearance and identification badges.

PLANNING

The local coordinator will plan the agenda for the on-site review with the size of the entity in mind. On-site reviews will be conducted in one or two days unless otherwise decided. Multiple locations or complexity of the size and location of the organization may require a longer period to complete the review. The Methods of Administration coordinator will provide guidance in determining the length of the visit.

AGENDA

The Local Coordinator will make all arrangements for the on-site review including collaborating with the Methods of Administration coordinator to develop an agenda tailored to the entity being reviewed. The Local Coordinator will consider the complexity of the review, the number of buildings to be assessed and other factors. This section provides the Local Coordinator with additional information to begin development of an agenda for the on-site review. When developing the agenda, consider the amount of time necessary to travel to various locations. The following components must also be included:

- Location name, address, phone number and review date(s)
- Time, location and rooms for entrance, exit, staff and student interviews
- Facility accessibility review

If multiple building facilities are reviewed, the Methods of Administration coordinator will help coordinate the schedule over two or more days as needed. Participation of local personnel with knowledge of the various facilities will expedite this part of the review process.

ENTRANCE INTERVIEW

The Department will conduct on-site reviews during normal working hours. They will begin at the agency administrative office or other designated location with an entrance interview that includes the superintendent, president or designee along with other invitees. This meeting should not exceed one hour. The superintendent, president or designee and the Local Coordinator is expected to attend the meeting. The purpose of this meeting is to provide an overview of the process.

1. Extend invitations to the superintendent, president, directors and other staff members that may be interested in or can provide information pertinent to the review.
2. Determine the time and location of the entrance interview and add it to the prepared agenda.
3. Arrange presentation of a brief overview of the local entity by appropriate personnel to explain:
 - a. General philosophy of the district, school, college or institution
 - b. Size and demographics of the population served
 - c. Support from the community
 - d. Type of career-technical education programs, related services offered and locations

e. Strong points and problem areas

MOA COORDINATOR RESPONSIBILITIES FOR ENTRANCE INTERVIEW

1. Introduce all state team members by name and title
2. Explain the reason for the review and how the district was selected
3. Explain the overall process for the review and follow-up procedures
4. Respond to any questions about the civil rights process

INDIVIDUAL AND GROUP INTERVIEWS

A critical component of the on-site review is to gather input from those most directly impacted by the policies and CTE delivery. For this reason, the review team will interview staff and students in a quiet and neutral location. The location is ideally the same location as the dedicated room space.

The local coordinator should explain to personnel, students and staff that the purpose of the interview is to gather data and not as a part of an investigation. During the administrator’s group interview, which may be combined with the entrance interview, the review team should speak with:

- Superintendent, president or designee
- Career-technical education director or dean
- Title IX coordinator
- 504 coordinators
- Special education director
- Facilities director
- Building principal

Group interviews will be conducted with each of the following separate groups:

- Counselors, recruiters and marketing
- Academic and career-technical teachers
- Diverse group of students
- 504 and Title IX coordinators, if separate individuals

Please note that postsecondary institutions, correctional facilities and some state operated programs may have different titles for these individuals. The functions performed by those in the position should be similar. For example, superintendent/college president/warden or director/occupational dean/prison school principal.

The Methods of Administration coordinator has authority under law and retains the right to interview any person as a part of the review. Each group interview session should last approximately 45 minutes, with 15 minutes for note taking before the next group arrives.

FACILITY ACCESSIBILITY REVIEW

All buildings and centers where career-technical education classes are held and where CTE students assemble, should be available for observation and review. See [Facilities](#) and [Parking](#) accessibility review documents. These documents must be submitted to the Methods of Administration coordinator at least one week in advance of the on-site review. Failure to submit accurate documentation will extend the review time needed.

Two hours should be allowed per building assessed. Depending on the size and number of buildings and campuses under review, additional time may be required.

The following items will be reviewed:

- Career-technical education classrooms/labs
- Academic classrooms (sample)
- Career resource centers
- Guidance and counseling centers (offices)
- Offices
- Special resource centers – student services
- Special facilities and equipment for disabled, bilingual or other special needs groups
- Library, cafeteria, auditorium, commons, parking, garage or other public areas

Subrecipients may not exclude students or community members with disabilities from accessing career-technical education or academic programs, activities or services due to inaccessible facilities.

- [Section 504:34 CFR § 104.21](#)
- [Title II: 28 CFR § 35.150\(a\)](#)
- [Title II: 28 CFR § 35.151\(a\)\(b\) Guidelines IV-N](#)

Interviews with the local administrators may clarify compliance with this standard. In addition to interviews, a visual inspection of facilities will be conducted. Blueprints, construction contracts or work orders may be requested in advance of the on-site visit to reduce the time spent on-site. The date the facility was constructed or last renovated determines the applicable accessibility standards:

- [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 – 1991 ADA Standards or UFAS](#)
- [New construction or alteration initiated on or before 9/15/10 to 3/15/12-1991 ADA or UFAS or 2010 ADA Standards \(28 CFR 35.151\)](#)
- [New construction or alteration initiated on or after 3/15/2012-2010 ADA Standards](#)

The table in the appendices indicate, by the applicable standard, items that will be surveyed. Parking lots are considered separate facilities and may have been renovated after the date of their original construction. If this is the case, the date of the renovation will determine the standard applied.

EXIT INTERVIEW

Prior to the exit interview, the review team will need to meet for one hour to compile notes and prepare for the interview. Depending on the number of questions, the exit interview should take approximately 30-60 minutes.

The exit interview will be the final activity of the on-site review. The purpose of this meeting is to provide:

- Preliminary impressions of on-site findings
- Timelines for the written report and corrective action plan
- Procedures for contesting decisions
- An opportunity to evaluate the on-site review process

Local administration will select those who attend this meeting. It is recommended that those who attended the entrance interview be present for the exit interview. If other staff are interested in the general findings, they may also attend. Because remedy for non-compliant items will be required, it is highly recommended that persons empowered to facilitate anticipated change be present.

DEPARTMENT REVIEW TEAM MEETING ROOM

The local coordinator should schedule a private room for the review team to meet.

Letter of Findings

Within 60 days of the exit interview the Methods of Administration coordinator will prepare and electronically send a letter of findings, which is a written report of the desk and on-site review, to the superintendent, dean, president and Local Coordinator. The letter will also include instructions regarding the submission of a voluntary compliance plan.

The letter of findings (LOF) is an official document that is submitted to the United States Department of Education, Office of Civil Rights for review of findings noted during the on-site visit.

LOF Overview

Pertinent information that provides a general description of the district, college or state operated program regarding size, location, number of campuses or buildings, programs offered and student demographics.

SECTIONS

1. Administration
2. Recruitment/Admission/Counseling
3. Comparable Facilities
4. Physical Accessibility and Site Selection
5. Services to Students with Disabilities
6. Work Study, Coop, Job Placement
7. Employment

Each section will be addressed with the following information:

1. Citations of the applicable civil rights laws
2. Description of the review process
3. Findings
4. Required action(s)

Voluntary Compliance Plan

The Local Coordinator will have 30 days from receipt of the Letter of Finding to compile a Voluntary Compliance Plan (VCP) on the provided template. The plan must end in the compliance of all findings within 24 months of the date of the on-site review. The VCP must be signed by all responsible parties.

Approval of the VCP

The Methods of Administration coordinator has 30 days to approve the VCP. If the VCP does not result in an approved compliance for any finding, the Methods of Administration coordinator may negotiate the plan to result in an approved compliance.

Follow-Up to Approved Voluntary Compliance Plan

After approval of the voluntary compliance plan, the MOA Coordinator will schedule monthly technical assistance meetings with the Local Coordinator until evidence of completion is submitted and validated by the MOA Coordinator. Upon validation of the submitted evidence of compliance, the review process is complete.

Evidence of Completion

The Local Coordinator will compile the evidence of compliance for all findings in one PDF document and submit the document electronically to the Methods of Administration coordinator by the selected due date. The Methods of Administration coordinator will approve the evidence and the civil rights review process will be completed.

Appendices

Local Coordinator Checklist

Local Coordinator Checklist			
Tasks to be Completed (Identify person responsible for each task listed below.)	Responsible Name:	Due date:	Completed:
Appropriate documents and/or links have been electronically sent to the MOA coordinator for the desk review 30 days from the virtual orientation. Each electronic folder is labeled with the correct title.			
Develop an agenda at least three weeks prior to the first day of the on-site review based on input from the Methods of Administration coordinator.			
Pre-visit information form has been completed, including exact date construction or additions started. Send to the Methods of Administration coordinator prior to review.			
Parking lot maps and charts (Google Maps), with a count of spots by type at each distinct location have been submitted to the Methods of Administration coordinator prior to the review.			
Dates for all construction of building and parking renovations have been collected and forwarded to the Department. See Facilities and Parking accessibility review templates.			
Facility review has been scheduled per the agenda. <ul style="list-style-type: none"> • Facility manager, or designee, is confirmed available to accompany reviewer. • The 504 and Title IX coordinators are confirmed available for interview. • Other appropriate staff and a diverse selection of students have been identified and notified of entrance and exit interviews. • All staff, teachers, and administrators have been notified of the date and time of the visit and what to expect. • Security personnel, if any, have been notified of the date and time of the visit. 			
All students and staff have been informed that they may be asked to complete a confidential survey or participate in an interview.			

A quiet room with adequate table space has been identified for the ODEW Team.			
---	--	--	--

Facilities Building Information

Built or altered between June 4, 1977, and January 17, 1991	Built or altered between January 18, 1991, and January 26, 1992	Built or altered after 1/27/92 and 9/15/10 exercising the option to follow UFAS or 1991 ADA	Built or altered after March 15, 2012 (*2010 ADA standards can be used from 9/15/10 to 3/15/12)
Verification of ANSI Standards being met as follows: <ul style="list-style-type: none"> 4.1 Grading 4.2 Walks 4.3 Parking lots 5.1 Ramps and gradients 5.2 Entrances 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 	Verification of UFAS standards being met as follows: <ul style="list-style-type: none"> 4.1 Minimum requirements 4.2 Space allowance and reach ranges 4.3 Accessible route 4.4 Protruding objects 4.5 Ground and floor surfaces 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 	Verification of UFAS/ADA standards being followed as follows: <ul style="list-style-type: none"> 4.1 Minimum requirements 4.2 Space allowance and reach ranges 4.3 Accessible route 4.4 Protruding objects 4.5 Ground and floor surfaces 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 	Verification of 2010 ADA standards being followed as follows: <ul style="list-style-type: none"> 600 Space allowance and reach ranges 402 Accessible routes 307 Protruding objects 302 Ground and floor surfaces 502 Parking and passenger loading zones 406 Curb ramps 405/505 Ramps 500 Stairs 407 Elevators 410 Platform lifts (wheelchair lifts) 229 Windows 404 Doors 400/200 Entrances 602 Drinking fountains and water coolers 600 Water closets 604 Toilet stalls 605 Urinals 606/306 Lavatories and mirrors 607 Bathtubs 608 Shower stalls 213 Toilet rooms 604/606 Bathrooms, bathing facilities and shower rooms 606 Sinks

	<p>4.23 Bathrooms, bathing facilities, and shower rooms</p> <p>4.24 Sinks</p> <p>4.25 Storage</p> <p>4.26 Handrails, grab bars, tub and shower seats</p> <p>4.27 Controls and operating mechanisms</p> <p>4.28 Alarms</p> <p>4.29 Tactile warnings</p> <p>4.30 Signage</p>	<p>4.23 Bathrooms, bathing facilities and shower rooms</p> <p>4.24 Sinks</p> <p>4.25 Storage</p> <p>4.26 Handrails, grab bars, tub and shower seats</p> <p>4.27 Controls and operating mechanisms</p> <p>4.28 Alarms</p> <p>4.29 Detectable warnings</p> <p>4.30 Signage</p> <p>4.31 Phones</p> <p>4.32 Fixed or built-in seating or tables</p> <p>4.33 Assembly areas</p> <p>4.34 Automatic teller machines</p> <p>4.35 Dressing and fitting rooms</p> <p>Other requirements</p>	<p>811 Storage</p> <p>607/609 Handrails, grab bars, tub and shower seats</p> <p>407/704 Controls and operating mechanisms</p> <p>702 Alarms</p> <p>705 Detectable warnings</p> <p>703 Signage</p> <p>704 Phones</p> <p>221/802 Fixed or built-in seating or tables</p> <p>221/802 Assembly areas</p> <p>707 Automatic teller machines</p> <p>206/221/402/802 Dress and fitting rooms</p> <p>Other requirements</p>
--	--	---	--

