



# What “Right” Looks Like

## Office of Civil Rights Compliance Workshop

### October 7, 2019

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★ LEADING HIGHER EDUCATION ★

ATTAINMENT

ALIGNMENT

EXCELLENCE

# Overview

- Why are you here?
- What is next?
- What if your (postsecondary) institution is not selected?
- What if your institution is selected?
- What you can do at your institution?
- Where can you get assistance?

# Why are we here?

If your institution receives federal financial assistance, your institution gets monitored

- Compliance with Federal Civil Rights laws
- Administrative accessibility of Career Technical Education (CTE)
- Physical accessibility of CTE areas
- DOE website:  
<http://www2.ed.gov/about/offices/list/ocr/aboutocr.html>

# The Process

- Desk Audit
- Notification Letter
- Collection of Indicators of Compliance
- Study of Indicators
- On-Site Visit
- Preliminary/Final Letter of Findings
- Voluntary Compliance Plan
- Alterations
- Closed Findings/File Letter

# Purpose

- The process is not punitive
- The goal is to reduce or eliminate administrative and physical barriers to CTE programs, including staff and students
- If proper alterations are made prior to the on-site visit, findings may be reduced
- Your institution can update practices and facilities without being selected for a visit

# Voluntary Updates

- Your institution can update practices and physical accessibility without being selected for a visit

## Why?

- It is the right thing to do for students and staff
- It is the law

# The Desk Audit

Reported KHEDS (postsecondary) data:

- Gender enrollment in CTE
- Minority enrollment in CTE
- Special Population enrollment in CTE
  - Disability
  - Limited English Proficiency (LEP)
  - Economically Disadvantaged

Year of the last on-site review

# What Next?

- Use the On-Site Coordinator's Manual
  - You have the hard copy (postsecondary)
  - Also available here:  
[https://www.kansasregents.org/resources/PDF/Perkins Grants/KBOR OCR Manual On-Site Review Aug 2019.pdf](https://www.kansasregents.org/resources/PDF/Perkins%20Grants/KBOR%20OCR%20Manual%20On-Site%20Review%20Aug%202019.pdf)
  - Review your own institutional procedures
  - Check indicators of compliance
  - Fix any areas of concern
- Receive your notification
  - Selected for an on-site review
  - Not selected for on-site review



# What if your institution is not selected?

- Continue voluntary self-evaluation of your facilities and procedures
- Request technical assistance from your Methods of Administration (MOA) Coordinator as needed:
  - Secondary Institutions: Wendy Coates, KSDE
  - Postsecondary: Tobias Wood, KBOR
- Contact Ray Petty if a preventative facilities review is wanted

# What if your institution is selected?

- Assemble a team
  - At least one Administrator
  - Title IX and/or Section 504 Coordinator
  - Facilities Supervisor
- Review the On-Site Coordinator's Manual
- Review ADA Standards and handbooks
- Assemble and organize indicators of compliance
- Make proper corrections where possible
- Communicate with your MOA Coordinator

# Indicators of Compliance

- If you check “Yes” for an indicator, make a copy and/or save to a folder
- Keep the indicators organized like the Manual
- If you check “No” for an indicator, assess the need
- Make proper corrections as needed
- If appropriate corrections are made prior to the on-site visit, findings may be minimized

# Administrative Reviews

## Components include:

- Equity Requirements
- Recruitment Requirements
- Admission Requirements
- Counseling and Pre-Professional Program Requirements
- Services to Students with Disabilities

# Administrative Reviews, Cont.

- Work Study, Cooperative Education and Job Placement
- Apprenticeship Training Program
- Employment
- Site Location and Student Eligibility
- Student Financial Assistance

# Check these now with your phone or computer:

- Continuous Nondiscrimination Notice
  - Should be one click away from your web page
  - Recruitment materials . . .
- Person(s) responsible for coordinating Title IX and Section 504
  - Including contact information
- Annual Public Nondiscrimination Notification
  - Published to public prior to school beginning
- Grievance Procedure

# Example of Postsecondary Annual Notice of Non-Discrimination

Public Notice  
A-Z Community College  
Notice of Non-Discrimination

A-Z Community College does not discriminate on the basis of race, color, sex, national origin, or disability in employment, programs, or activities. A-Z Community College offers Career and Technical Education (CTE) programs in: Agriculture, Business and Office Technology, Health Sciences, Automotive Repair and Refurbishing, Carpentry, and Welding. A-Z Community College applies an open access policy, with program admission based upon the completion of applicable course/testing prerequisites. Lack of English skills will not be a barrier to admission and participation in CTE programs.

For inquiries regarding A-Z Community College's nondiscrimination policies or compliance with Title II, Title IV, Title VI, Title IX and/or Section 504, contact: First Last, (and/or) Title, A-Z Community College, 123 Main Street, City, KS 12345, (999) 123-4567, [first.last@athruz.ks.edu](mailto:first.last@athruz.ks.edu)

(optional) For further information concerning the education offerings and specific pre-requisite criteria, contact: Another Person, (and/or) Title, A-Z Community College, 456 Next Street, City, KS 12345, (999) 123-9876, [another.person@athruz.ks.edu](mailto:another.person@athruz.ks.edu)

To obtain this information in a language other than English, call (999) 123-4567.

# Web Accessibility

Is your website accessible for those with vision and/or hearing disabilities?

For help, visit:

[https://www.accessibilityonline.org/archives/session\\_detail.aspx?id=37](https://www.accessibilityonline.org/archives/session_detail.aspx?id=37)

- Closed Captioning of videos
- Other accessibility features



# Facilities Review

- Can the public, staff, and students access CTE programs?
- Get a measuring tape and a digital level
- Prepare to learn about restrooms, accessible routes, and reach ranges
- Ray Petty is a great resource!
- Use the accessibility “tool-kit” handouts
- Refer to the appropriate ADA Law for help

# Who helps your students? Do they know?

- Consider posting contact information for reporting discrimination or sexual misconduct on
  - Bulletin boards
  - Syllabi

On-Campus rapes at KU doubled in 2018:

<http://www2.ljworld.com/news/public-safety/2018/oct/01/on-campus-rapes-doubled-last-year-at-ku-clery-report-says/>

Stop Sexual Assault in Schools:

<http://stopsexualassaultinschools.org>

RAINN (Rape, Abuse, & Incest National Network) built this free online resource:  
<http://preventionnavigator.rainn.org/>

National Women's Law Center interview:  
<https://nwlc.org/blog/why-we-need-title-ix-to-let-her-learn-a-parents-perspective/>

Additional Resources:  
<https://nwlc.org/resources/additional-resources-from-stop-sexual-assault-in-schools/>

Let Her Learn series:  
<https://nwlc.org/resources/let-her-learn-toolkit-sexual-harassment/>

# OCR Complaint Process

PDF of Discrimination Complaint Form:

<https://www2.ed.gov/about/offices/list/ocr/complaintform.pdf>

- Fillable PDF
- Contains the OCR Complaint Processing Procedures
- Optional: Add the link to the statements with Title IX and Section 504 contact information
- Optional: Keep hard copies available

# U.S. Department of Education Office for Civil Rights

Lyndon Baines Johnson DOE Bldg  
400 Maryland Avenue, SW  
Washington, DC 20202-1100

Telephone: 800-421-3481

FAX: 202-453-6012

TDD: 800-877-8339

Email: [OCR@ed.gov](mailto:OCR@ed.gov)

# Kansas City Office Office for Civil Rights U.S. Department of Education

One Petticoat Lane  
1010 Walnut Street, 3rd floor, Suite 320  
Kansas City, MO 64106

Telephone: 816-268-0550

FAX: 816-268-0599;

TDD: 800-877-8339

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# QUESTIONS?

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