

FY14 OCR MONITORING ON-SITE VISIT REVIEW SHEET (POST-SECONDARY)

AREA OF REVIEW	INDICATORS OF COMPLIANCE	DOCUMENTATION	YES	NO	COMMENTS
<p>1. ADMINISTRATIVE Civil Rights Assurance The college has a statement of assurance (signed by the Superintendent and/or Board chair) for Title VI, Title IX and Section 504. <u>Title VI of the Civil Rights Acts of 1964 [CFR 100.4(a) thru (d)]</u> <u>Title IX of the Education Amendments of 1972 [34 CFR 106.4]</u> <u>Section 504 of the Rehabilitation Act of 1973 [34 CFR 104.5]</u></p> <p>Annual Public Notification Prior to the beginning of each school year, the college must advise students, parents, employees and the general public that all career preparation programs 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 Title IX and Section 504 compliance activity.</p>	<p>A signed copy of assurance for Title VI of the Civil Rights Acts of 1964 [CFR 100.4(a) thru (d)], Title IX of the Education Amendments of 1972 [34 CFR 106.4] and Section 504 of the Rehabilitation Act of 1973 [34 CFR 104.5] is one file in the institution</p> <p>The college issues annual public notice of non-discrimination.</p> <p>The annual notice lists Title IX and Section 504 Coordinators with their name, title, address, and telephone number.</p> <p>Annual notice is disseminated in the language of any national origin community with limited English language skills in the service area and state that the recipient will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in career education programs</p>	<ul style="list-style-type: none"> • Signed Title VI, Title IX, Section 504 or combined assurance • School board minutes authorizing assurances • Copy of application for federal Carl D. Perkins funds (signatures signify compliance). • A notice in newspaper, newsletter or other publication • A copy of notice describing program offerings and admission criteria. • A description of how the notice reaches students, employees and applicants. • A description of the method used to make this notice available to the visually impaired. • If there are national origin minority students with limited English skills in the community, 	<p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p>	<p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p> <p align="center"><input type="checkbox"/></p>	

<p>Continuous Nondiscrimination Notice. The college must take continuing steps to notify participants, beneficiaries, applicants, elementary and secondary school parents, employees (including those with impaired vision or hearing), and unions of 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>Title II, Title IX and Section 504 Coordinators Each college shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, <u>Title IX 34 CFR 106.8</u> <u>Section 504 [34 CFR 104.7(a)]</u> <u>Title II [28 CFR 107(a)]</u></p>	<p>A variety of college publications notify applicants, students, employees and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p> <p>The college 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>The college lists coordinators of Section 504, Title II, and title IX with their name/title, address, and phone</p>	<p>a description of the method used to make this notice available to students and community members.</p> <ul style="list-style-type: none"> • Program and activities brochures • Student application • Job application • Staff handbook • Parent/Student handbook(s) • Job postings/application • Posters advertising various programs • Recruitment materials • Website • School newspaper/calendar <p>Copies of information identifying the Section 504, Title II, and Title IX Coordinators and their contact information</p> <ul style="list-style-type: none"> • Staff & Student handbooks • Job postings • Website 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
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<p>The college must not deny access to career preparation programs 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 non-disabled persons. <u>Section 504 (34 CFR 104.10) Guidelines IV-N</u></p> <p>Limited English Skills The college may not restrict admission to career preparation programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. <u>Guidelines IV-L</u></p> <p>Impaired Sensory, Vocal or Speaking Skills Postsecondary admission tests are selected and reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the test purports to measure). <u>Section 504 (34 CFR</u></p>	<p>The college does not discourage students with disabilities from participating in programs due to potential workplace discrimination.</p> <p>The college has a procedure in place to identify and assess applicants with limited English proficiency. --LEP enrollment in career preparation education is proportional to LEP enrollment in the service area. --LEP enrollment in specific career preparation programs is proportional to the LEP enrollment in career preparation overall.</p> <p>Admission tests and their manner of administration are validated for use with persons with impaired sensory, vocal or speaking skills.</p>	<ul style="list-style-type: none"> • Number of students with disabilities by program • Placement/follow-up data • Procedure for LEP identification and placement • Summary of steps taken to increase LEP participation in programs where they traditionally have been underrepresented • Specific program enrollment demographics by LEP status • Lists of admissions tests used • Description of test administration methods for persons with sensory, vocal or 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
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<p><u>104.42(b)(3)</u> <u>Guidelines IV-N</u></p> <p>Preadmission Inquiries re: Disabilities to Increase Participation Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified. <u>Section 504.34 CFR 104.42(b)(4) & (c)</u></p>	<p>The college does not request information about disability prior to admission</p>	<p>speaking impairments</p> <ul style="list-style-type: none"> • Student handbook • College catalog • Application forms • Guidance/counseling forms and procedures • Recruitment materials • Admissions packets 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<p>3. RECRUITMENT Non-exclusive Recruitment Colleges must conduct their recruitment activities so as not to exclude or limit opportunities <u>Title IX ([34 CFR 106.23(a)(b)]</u> <u>Guidelines V-C</u></p> <p>Recruitment Materials Recruitment materials' description of career preparation program opportunities should not be limited on the basis of race, color, national origin, sex, or disability. <u>Guidelines V-C</u></p>	<p>All potential students have access to information. Efforts are made to reach underrepresented groups.</p> <p>Descriptions of career opportunities are bias-free and free from stereotyping.</p>	<ul style="list-style-type: none"> • Recruitment plans • List of recruitment activities and sites • Description of recruitment activities • Recruitment brochures and marketing materials – English and non-English versions • Course Catalog 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

<p>5. SERVICES FOR STUDENTS WITH DISABILITIES No Exclusion Based on Disability 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></p> <p>Students with disabilities must not be excluded from career preparation programs 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></p>	<p>The college implements policies and procedures ensuring access for students with disabilities to programs, services, and activities.</p> <p>The college provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities.</p>	<ul style="list-style-type: none"> • Board policy <input type="checkbox"/> • Student Handbooks <input type="checkbox"/> • Membership lists in clubs & activities <input type="checkbox"/> • Procedures for selection into clubs, activities, programs <input type="checkbox"/> • Criteria for admission into courses, programs, services and activities <input type="checkbox"/> • Public notification that all services, activities, and facilities are accessible for individuals with disabilities <input type="checkbox"/> • Examples of equipment adapted <input type="checkbox"/> • Description of policy for providing aids and services <input type="checkbox"/> • Description of aids and services available/provided/denied <input type="checkbox"/> • List of materials/resources available for students with sensory impairments <input type="checkbox"/> • Enrollment data by program <input type="checkbox"/> 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
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<p>constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities.</p> <p>Conformance with the 1991 ADA Standards for Accessible Design (Appendix A to 28 CFR Part 36). Departures from particular technical and scoping requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. Subrecipients may also exercise the option to follow UFAS).</p> <p><u>Title II [28 CFR 35.151 (a) (b) (c)(1)</u></p> <p>New construction under ADA Title II – Built on or after September 15, 2010, and before March 15, 2012; exercising the option to follow the 2010 ADA Standards)</p> <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 2010 ADA Standards. Departures from particular technical and scoping</p>	<p>2010 ADA Standards for Accessible Design</p>	<ul style="list-style-type: none"> • Observations and measurement • Blueprints and plans • Renovation schedules • Maintenance records • Work orders or contracts indicating construction start dates 	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	
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<p>requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. (Subrecipients may also exercise the option to follow UFAS or the 1991 ADA Standards. The elevator exemption contained at 1991 ADA Standards 4.1.3(5) and 4.1.6(1)9k) shall not apply.) <u>Title II [28 CFR 35.151 (c)(2)</u></p> <p>New construction under ADA Title II – Built on or after March 15, 2012; follow 2010 ADA Standards 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 2010 ADA Standards. <u>Title II [28 CFR 35.151 (c)(3)</u></p>	<p>2010 ADA Standards for Accessible Design</p>	<ul style="list-style-type: none"> • Observations and measurement • Blueprints and plans • Renovation schedules • Maintenance records • Work orders or contracts indicating construction start dates 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
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<p>7. <u>COMPARABLE FACILITIES</u></p> <p>Changing Rooms/Showers Comparable 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. <u>Title IX (34 CFR 106.33) Section 504[34 CFR 104.4(b)(ii) 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 a disparity, the institution provides a legitimate, nondiscriminatory rationale.</p> <p>Changing rooms, shower, bathrooms, and other facilities near the professional technical areas are comparable for both men and women.</p> <p>Persons with disabilities have convenient access to changing facilities and shower facilities.</p>	<ul style="list-style-type: none"> • Visual examination of the facilities 	<input type="checkbox"/>	<input type="checkbox"/>	
<p>8. <u>CAREER RELATED LEARNING EXPERIENCES</u></p> <p>Opportunities Available to All Opportunities in work study, cooperative education, and job placement programs are</p>	<p>Students in work study, cooperative education, and job placement programs are representative of the demographics of the school or program.</p>	<ul style="list-style-type: none"> • Review of enrollment data in work study, cooperative education, and job placement programs. 	<input type="checkbox"/>	<input type="checkbox"/>	

<p>Nonrestrictive Career Objectives for Students with Disabilities Colleges may not counsel disabled students toward more restrictive career objectives than non-disabled students with similar abilities and interests. <u>Section 504 [34 CFR 104.37(b)]</u> <u>Guidelines V-B</u></p> <p>Counseling of Students with Limited English Proficiency or Hearing Impairments Colleges must ensure that counselors can effectively communicate with students with limited English proficiency and with students with sensory impairments. <u>Guidelines V-O</u></p> <p>Disproportional Enrollment If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Colleges must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.</p>	<p>Students with disabilities have equal access to all programs and classes based on abilities and interests.</p> <p>The content of materials available to other students and their parents is available to students and parents who speak languages other than English.</p> <p>Formats other than the printed word are available for students with disabilities.</p> <p>The college has a process in place to identify disproportionate enrollment. When disproportionate enrollment occurs, the college assesses counseling materials and activities and makes appropriate revisions or can articulate a legitimate, nondiscriminatory rationale.</p>	<ul style="list-style-type: none"> • Examples of pre-enrollment counseling • Enrollment data • Written plan for the provision of services for LEP individuals • Written plan for the provision of services for individuals with hearing impairments • Samples of materials in other languages/formats. • Description of any efforts made to correct disproportionate enrollment by gender, minority or disabled status. • Examples of pre-enrollment counseling • Enrollment data 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
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OVERALL COMMENTS:

[Empty box for overall comments]

Date of Review: _____

Name of reviewer: _____

RHODE ISLAND DEPARTMENT OF EDUCATION

Civil Rights Compliance Review Guide

2014

Statement of Confidentiality and Conflict of Interest

Date: _____

I certify that I do not have a conflict of interest in reviewing the evidence for this school as part of the OCR compliance review and that I have fully disclosed any and all connections to the school being reviewed. I agree that all information reviewed through both the documents provided by the school and interviews conducted at the school will be held in strict confidence and will not be shared with anyone outside of the review team.

Print Name

Signature