



# Planning for a Civil Rights Review Methods of Administration (MOA)



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# Purpose

The purpose of this document is to provide guidance for a civil rights review conducted by staff at the Nevada Department of Education Office of Career Readiness, Adult Learning, and Education Options (CRALEO) related to the Methods of Administration (MOA). The MOA program ensures students have equal access to Career and Technical Education (CTE) programs and activities regardless of race, color, national origin, sex, or disability. Information necessary to prepare for an effective and efficient MOA review will be outlined in four sections:

- Process overview
- Agenda
- Sharing documentation
- Areas for review

Civil rights compliance reviews are intended to help recipients identify areas of improvement to comply with current civil rights regulations and guidelines. The intention is to reduce the risk of a civil rights complaint being filed against the entity. We're available to provide technical assistance and collaborate on solutions for any corrective actions.

## Process overview

### Why is the CRALEO team conducting a review?

The U.S. Department of Education's Office for Civil Rights requires the CRALEO to conduct reviews of civil rights compliance in Nevada annually at entities with Career and Technical Education (CTE) programs. The CRALEO MOA team will review data and documents and may interview staff to determine if the entity complies with current civil rights regulations and guidelines. For your convenience, the following is a list of the civil rights regulations and guidelines with relevant links:

- [Guidelines: Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap](#)
  - [34 CFR Part 100 Appendix B](#)
- [Title VI of the Civil Rights Act of 1964](#)
  - [34 CFR 100](#)
- [Title IX of the Education Amendments of 1972](#)
  - [34 CFR Part 106](#)
- [Section 504 of the Rehabilitation Act of 1972](#)
  - [34 CFR Part 104](#)
- [Title II of the Americans with Disabilities Act of 1990](#)
  - [28 CFR Part 35 as applies to Public Entities](#)
  - [eCFR: 28 CFR Part 35—Nondiscrimination on the Basis of Disability in State and Local Government Services](#)

## How are programs selected?

Secondary and post-secondary (odd year in the fall) entities are selected based on a compliance risk assessment that combines Perkins V and MOA factors.

## What is the process of a civil rights compliance review?

This initial review consists of document reviews and may include interviews with staff. Additionally, sites may be selected for a physical accessibility review. The review process is described in more detail below and within this document.

1. Entities are notified by CRALEO of the audit via letter from NDE Superintendent.
2. CRALEO meets with entities to explain the process and subsequent steps.
3. Entity provides information requested documentation by the required agreed upon deadline.
4. CRALEO reviews compliance and drafts Letter of Finding (LOF).
5. CRALEO may select entities for an onsite visit (see page 6). CRALEO updates the chosen entities' LOF to reflect the additional requirements.
6. Entity completes a Voluntary Compliance Plan (VCP) from the LOF to help ensure corrections are made.
7. MOA coordinator provides technical assistance on how entity can meet requirements.
8. Entity submits VCP according to requirement in LOF.
9. Once VCP is accepted, entity and MOA coordinator work together until corrections are made.
10. Entity receives completion letter from CRALEO closing out the process.

### Desk Review

The entity will [upload documents](#) as identified in the [Areas of Review](#) section of this document.

The CRALEO review team may need to speak with individuals from various program areas. As a first step, it may be helpful to identify and assign staff responsible for each section ([Areas of Review](#) section) of the review process.

CRALEO will communicate the date the documents need to be uploaded. Upon completion of the review, the review team will provide the entity with a letter of finding (LOF).

The entity must prepare a voluntary compliance plan (VCP) to describe the activities the entity will implement to become compliant. The VCP is due to the CRALEO MOA coordinator within 45 business days of receipt of the LOF. The CRALEO review team will the VCP, and either approve it as is, or work with you to ensure that the appropriate corrective action is taken to bring the entity into compliance.

### Onsite Review Agenda (if notified)

The CRALEO review team may need to speak with individuals from various program areas. As a first step, it may be helpful to identify and assign staff responsible for each section ([Areas of Review](#) section shown below) of the review process and agenda.

## How does the designated staff member assist with the civil rights compliance review?

### Before the review

Pre-visit preparation includes three key components: gathering the necessary documentation and data, scheduling the interviews with the appropriate staff (as requested), and developing the agenda for a potential on-site visit. A full description of the required materials is listed after each section.

Preparation for a civil rights review requires communicating and coordinating with staff across many programs. The review team strongly encourages the entity to use a team approach and delegate the responsibilities to gather data. The CRALEO review team can assist the entity with logistical and technical details.

We understand this review requires significant preparation. If you don't have the time or resources to complete any required task, please contact your CRALEO review team to discuss options. We're on the same team and here to support you in this process.

### During the virtual or in person on-site review

- Serve as the primary point of contact for questions as they may arise.
- Update the CRALEO review team on changes to contacts.
- Provide contact information for IT assistance with technical difficulties that may be experienced.

### After the review

- Assist the with developing the VCP.
- Provide the CRALEO MOA coordinator with updates on the actions taken for non-compliant areas.
- Send quarterly VCP updates to the CRALEO MOA coordinator until all findings are resolved.

## Sharing documentation

To ensure all documentation is collected and organized, the CRALEO review team will be collecting data by e-mail.

NOTE: Exclude any personally identifiable information (PII) in the files. PII includes items such as name, social security number, student ID number, date of birth, or other information that may identify an individual.

Materials to be provided electronically via CRALEO's e-mail to:

**Barbara Dillard**  
**Education Programs Professional**  
**Office of Career Readiness, Adult Learning, and Education Options**  
**755 N. Roop Street, Suite 201**  
**Carson City, NV 89701**

Please contact Barbara Dillard at [barbara.dillard@doe.nv.gov](mailto:barbara.dillard@doe.nv.gov) if you have any questions.

## **Areas for review**

1. Administrative requirements
2. Recruitment, admission, and counseling
3. Physical accessibility
4. Comparable facilities
5. Services for students with disabilities

### Documentation Areas:

1. Administrative Requirements
  - a. Annual Notice of Non-Discrimination
  - b. Continuous Notice of Non-Discrimination
  - c. Designation of Compliance Coordinators
  - d. Grievance Procedures
2. Recruitment, Admissions, and Counseling
  - a. Admissions Criteria and Access to Classes
  - b. Access for National Origin Minority Students with Limited English Language Skills
  - c. Counseling and Prospects for Success
  - c. Counseling of Students including those with Limited English-Speaking Ability or Deaf or Hard of Hearing
  - e. Recruitment and Promotional Activities
3. Accessibility for Students with Disabilities
4. Comparable Facilities
5. Services for Students with Disabilities

# 1. Administrative requirements

## A. Annual Notice of Non-Discrimination

### Applicable requirements

- Public notification: [Guidelines—Section IV.O](#)
- Compliance information to beneficiaries and participants: [34 CFR § 100.6\(d\)](#)

Prior to the beginning of each school year, entities must advise students, parents, employees, and the general public that all CTE opportunities will be offered without regard to race, color, national origin, sex, or disability. Announcement of this policy of nondiscrimination may be made, for example, in local newspapers, entity publications, and/or other media.

The notice must include a brief summary of program offerings and admission criteria, as well as the name, office address, and phone number of the person(s) designated to coordinate compliance under Title IX and Section 504. If an entity's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that entity will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

### Materials/data to provide

- a. Annual Notice of Non-Discrimination
- b. Annual Notice of Non-Discrimination translated into any language other than English
- c. Description of the method the Annual Notice of Non-Discrimination is provided to individuals with visual or hearing impairments

## B. Continuous Notice of Non-Discrimination

### Applicable requirements

- Compliance information to beneficiaries and participants: [34 CFR § 100.6\(d\)](#)
- Notice: [34 CFR § 104.8](#)
- Notice: [28 CFR § 35.106](#)

An entity must take continuing steps to notify participants, beneficiaries, applicants, employees, and unions, that it does not discriminate on the basis of race, color, national origin, sex, or disability. The notice must identify the employees designated to coordinate compliance under Title IX and Section 504. If an entity publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of this nondiscrimination policy.

The continuous notice of nondiscrimination must contain:

- Statement specifying the bases for nondiscrimination
- Names, titles, addresses, and telephone numbers of the Title IX and Section 504 coordinators

### Materials/data to provide

- a. Student handbook
- b. Any CTE marketing catalogs
- c. Newspaper or other entity publications
- d. Flyers or pamphlets advertising CTE programs



## C. Designation of Compliance Coordinators

### Applicable requirements

- Public notification: [Guidelines—Section IV.O](#)
- Section 504: Designation of responsible employee: [34 CFR § 104.7\(a\)](#)
- Title IX: Designation of responsible employee: [34 CFR § 106.8\(a\)](#)
- Disability: Designation of responsible employee: [28 CFR § 35.107\(a\)](#)

The entity has assigned someone to coordinate Section 504/ADA and Title IX activities. This person(s) must be aware of their duties and responsibilities and have the training necessary to meet the requirements. The assigned person(s) must not have potentially conflicting roles, such as a dean of students, disciplinary board member, general counsel, or athletics director.

Entity provides list of coordinators of Section 504/ADA and Title IX with their name/title, office address, and phone number in appropriate publications.

### Materials/data to provide

- a. Section 504 coordinator contact information, including position title(s)
- b. Title IX coordinator contact information, including position title(s)

## D. Grievance Procedures

### Applicable requirements

- Section 504: Adoption of grievance procedures: [34 CFR § 104.7\(b\)](#)
- Title IX: Adoption of grievance procedures: [34 CFR § 106.8\(c\)](#)

An entity shall adopt and publish grievance procedures to resolve student and employee complaints alleging any discrimination based on sex or disability. The procedures are readily available to students and employees and ensure a prompt and equitable response.

### Materials/data to provide

- a. Grievance procedures for students and employees to address complaints concerning alleged discrimination

## 2. Recruitment, admission, and counseling

### A. Admissions Criteria and Access to Classes

#### Applicable requirements

- Guidelines Sections [IV.A, IV.K, and IV.N](#)
- Admissions and recruitment: [34 CFR § 104.42\(a\)-\(c\)](#)
- [34 C.F.R. §§ 100.3\(a\) and \(b\)\(1\)\(v\)](#)
- [34 C.F.R. §104.4\(a\)-\(b\)](#)
- [34 C.F.R. §104.43](#)
- [34 C.F.R. §106.21](#)
- [34 C.F.R. §106.22](#)
- [34 C.F.R. §106.34](#)
- [34 C.F.R. §106.35](#)
- General prohibitions against discrimination: [28 C.F.R. §35.130](#)

An entity may not develop, impose, maintain, approve or implement admissions criteria that unlawfully discriminate on the basis of race, color, national origin, sex or disability. However, if an entity can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory.

Entities may not deny students with disabilities access to CTE programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. Academic requirements that the entity can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory but, where possible, an entity must adjust those requirements to the needs of students with disabilities.

Access to CTE programs or courses may not be denied to students with disabilities on the ground that employment opportunities in any occupation or profession may be more limited for individuals with disabilities than for individuals without disabilities. An entity may not separate students by sex or deny a student access to a class or program based on their sex unless expressly authorized by Title IX or its implementing regulations.

An entity generally may not make pre-admission inquiry as to whether an entity is an individual with a disability, but, after admission, may make inquiries on a confidential basis as to disabilities that may require accommodation. An entity also may not make a pre-admission inquiry as to the marital status of an applicant or apply any rule concerning the actual or potential parental, family, or marital status of a student or applicant which treats persons differently on the basis of sex.

## **B. Access for National Origin Minority Students with Limited English Language Skills**

### **Applicable requirements**

- Eligibility of national origin minority persons with limited English language skills:  
[Guidelines—Section IV.L](#)

Entities may not restrict admission to CTE programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from CTE instruction to the same extent as a student whose primary language is English. It is the responsibility of the entity to identify such applicants and assess their ability to participate in CTE instruction.

### **Materials/data to provide**

- a. List of programs with selective admissions (application process that may result in more applicants than available slots)
- b. Copies of blank supplemental application forms for selective programs
- c. Promotional materials for selective programs (including brochures or flyers describing or advertising CTE programs)
- d. List of programs with selective admissions due to academic requirements such as minimum English proficiency
- e. Procedures for determining how students are accepted to programs with numerical or academic limitations (including any ranking instruments used)

## C. Counseling and Prospects for Success

### Applicable requirements

- [Guidelines Sections V.A, V.B, and V.D](#)
- General and specific discriminatory actions prohibited: [34 CFR § 100.3\(a\) and \(b\)](#)
- Counseling and placement services: [34 CFR § 104.47\(b\)](#)
- Counseling and use of appraisal and counseling materials: [34 CFR § 106.36](#). [See also [28 C.F.R. § 35.130](#).]

Entities must ensure that their counseling materials and activities do not discriminate on the basis of race, color, national origin, sex or disability. Entities must ensure that counselors do not steer 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. If a CTE program disproportionately enrolls students of a particular sex, students of a particular race, or students with disabilities, entities must take steps to ensure that the disproportion does not result from unlawful discrimination in counseling activities.

### Materials/data to provide

- a. Samples of counseling materials used, such as brochures, flyers, websites
- b. Any written counseling plans, policies, and procedures
- c. Describe the process to identify disproportionate program enrollment and steps for improvement. (For example, how does your entity become aware that the nursing program enrollment is majority female and the welding program is majority male? What steps are you taking to improve the enrollment?)

## D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

### Applicable requirements

- Counseling of students with limited English-speaking ability or hearing impairments: [Guidelines—Section V.D](#)
- General and specific discriminatory actions prohibited: 34 CFR § 100.3(a) and (b)
- Counseling and placement services: 34 CFR § 104.47(b)

Entities must ensure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

### Materials/data to provide

- a. Counseling materials translated into other languages
- b. Counseling materials specifically for English Language Learners (ELL)
- c. Counseling materials specifically for the hearing or visually impaired (including braille)
- d. Any written counseling plans, policies, and procedures
- e. List of interpretive services available to students with limited English-speaking ability

- f. List of interpretive services available to students with a hearing impairment or visual impairment
- g. Describe the process for potential and enrolled students to become proficient in English language skills

## E. Recruitment and Promotional Activities

### Applicable requirements

- Entity responsibilities: [Guidelines—Section V.A](#)
- Student recruitment activities: [Guidelines—Section V.C](#)
- Promotional activities: [Guidelines—Section V.E](#)
- Admissions and recruitment: [34 CFR § 104.42\(a\)](#)
- Nondiscriminatory recruitment: [34 CFR § 106.23\(a\)](#)
- Recruitment at certain institutions: [34 CFR § 106.23\(b\)](#)

Entities must take steps to ensure that their promotional and recruitment efforts do not discriminate or perpetuate stereotypes or limitations on the basis of race, color, national origin, sex or disability. If a entity's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

### Materials/data to provide

- a. Examples of recruitment materials, including brochures, Facebook, newspaper advertising
- b. Examples of promotional efforts (e.g., career days)
- c. Marketing plan/calendar of recruitment events and outreach activities (if available)
- d. List of CTE student organizations

## 3. Physical accessibility

**This section is listed for informational purposes and will be reviewed during an onsite review if the entity is notified of this type of review. Refer also to A Quality Program Standards Checklist for Onsite Methods of Administration.**

### Applicable requirements

- Equal access for handicapped students: [Guidelines—Section IV.N](#)
- Discrimination prohibited: [34 CFR § 104.21](#)
- New construction: [34 CFR § 104.23](#)
- Discrimination prohibited; Existing facilities; New construction and alterations: 28 CFR § 35.149-35.151

An entity may not exclude students with disabilities from its programs or services because its facilities are inaccessible to or unusable by individuals with disabilities. Applicable accessibility standards are determined by the date that a facility was constructed or the date that the facility was most recently altered:

- a. Construction or Alteration Initiated Before June 4, 1977: The Program Access accessibility standards apply. A recipient shall operate its program or activity so that when each part is viewed in its entirety, it is readily accessible to individuals with disabilities. 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. 34 C.F.R. § 104.22.

- b. Construction or Alteration Initiated Between June 4, 1977 and January 17, 1991 (inclusive): 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), apply.
- c. Construction or Alteration Initiated Between January 18, 1991 and January 26, 1992 (inclusive): The Uniform Federal Accessibility Standards (UFAS) accessibility standards (Appendix A to 41 CFR subpart 101-19.6) apply. 34 C.F.R. § 104.23.
- d. Construction or Alteration Initiated Between January 27, 1992 and September 14, 2010 (inclusive): The 1991 Americans with Disabilities Act Standards or UFAS accessibility standards apply. 34 C.F.R. § 104.23; 77 Fed. Reg. 14972-73, 14975-76 (2012); 28 C.F.R. § 35.151(c)(1).
- e. Construction or Alteration Initiated Between September 15, 2010 and March 14, 2010: The 1991 Americans with Disabilities Act Standards or UFAS accessibility standards or 2010 Americans with Disabilities Act Standards apply. 34 C.F.R. § 104.23; 77 Fed. Reg. 14972-73, 14975-76; 28 C.F.R. § 35.151(c)(2).
- f. Construction or Alteration Initiated March 15, 2012 or After: The vast majority of MOA subrecipients are public entities and required to comply with Title II. Title II requires compliance with the 2010 ADA standards for all corrective actions. 34 C.F.R. § 104.23; 77 Fed. Reg. 14972-73, 14974-75 and footnote 28, 14976; 28 C.F.R. § 35.151(c)(3).

#### **Materials/data to provide**

- a. Campus
  - a. Campus Maps
  - b. List and maps of each parking lot owned, rented, or leased
  - c. Date each lot was constructed or altered (resurfacing or repainting of lines)
  - d. The applicable standard used for construction of parking lot (if known)
  - e. Total number of accessible spaces in each lot
  - f. Number of van-accessible spaces in each lot
- b. Buildings
  - a. List of each building owned, rented, or leased
  - b. Date each building was constructed or altered
  - c. Square footage of each building
  - d. The applicable standard used for construction (if known)
  - e. Layout/map for each building

#### **Interviews to schedule (if requested)**

- Disabilities personnel
- Facilities director

Note: An on-site review may be scheduled at a time convenient to the entity.

## 4. Comparable facilities

**This section is listed for informational purposes and will be reviewed during an onsite review if the entity is notified of this type of review.**

### Applicable requirements

- Comparable facilities: [Guidelines—Section VI.D](#)
- Title IX Comparable facilities: [34 CFR § 106.33](#)

Entities must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex. Such facilities must be adapted or modified to the extent necessary to make the CTE program readily accessible to individuals with disabilities.

### Materials/data to provide

- a. Location, description, and comparison of separate facilities, services, or activities offered to all genders of students
- b. Location, description, and comparison of separate facilities, services, or activities offered to students with disabilities compared to students without disabilities

### Interviews to be scheduled (if requested)

- Disabilities personnel
- Facilities director

## 5. Services for students with disabilities

### Applicable requirements

- Equal access for handicapped students: [Guidelines—Section IV.N](#)
- Discrimination prohibited: [34 CFR § 104.4\(a\)](#)
- Treatment of students: [34 CFR § 104.43](#)
- Academic adjustments: [34 CFR § 104.44](#)
- General prohibitions against discrimination: [28 CFR § 35.130](#)
- Telecommunications, Telephone emergency services, and Information and Signage: 28 CFR § 35.160-35.163

Entities may not deny students with disabilities access to CTE programs or courses because of the need for related aids and services or auxiliary aids. If necessary, entities must modify instructional equipment; modify or adapt the manner in which the courses are offered; provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary students with disabilities; and provide related aids or services that assure secondary students an appropriate education. Entities shall take such steps as are necessary to ensure that no student with a disability is denied the benefits of, excluded from participation in, or otherwise subjected to discrimination because of the absence of educational auxiliary aids for students with impaired sensory, manual, or speaking skills. Entities must operate programs and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities. Secondary students with disabilities are placed in a CTE only when 504 free, appropriate public education (FAPE) requirements for evaluation, placement, and procedural safeguards have been satisfied.

### Materials/data to provide

- a. Website, flyers, or any information provided to students with disabilities regarding policies and procedures for receiving accommodations

- b. List of assistive technology available to students with a disability who need special accommodations or assistance to succeed in a CTE program
- c. List of supplementary aids and services available to students with a disability who need special accommodations or assistance to succeed in a CTE program

# Methods of Administration Documents to Provide

## Administrative requirements

### A. Annual Notice of Non-Discrimination

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Annual Notice of non-discrimination			
Annual Notice of Non-Discrimination translated into any language other than English			

Qualitative information to provide	Response	Additional information (i.e.. Shared supporting documentation)
Description of the method the Annual Notice of Non-Discrimination is provided to individuals with visual or hearing impairments		



## B. Continuous Notice of Non-discrimination

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Copy of Student-Parent Handbook (provide page number of where non-discrimination statement can be found)			
List of CTE program offerings and programs that require admission criteria			
Copies of CTE recruitment material, newsletter, other written materials distributed to students			

## C. Designation of Compliance Coordinators

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Section 504 coordinator contact information, including position title(s)			
Title IX coordinator contact information, including position title(s)			
Provide training materials used for Title IX and Section 504 coordinators			
Copies of the recipient's notice to the school community of the identities of coordinators (i.e. Job posting, CTE staff recruitment materials)			

## D. Grievance Procedures

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Grievance procedures for students and employees to address complaints concerning alleged discrimination for sexual and disability harassment			

## Recruitment, admission, and counseling

### A. Admissions Criteria and Access to Classes

Materials needed for 2.A are covered in subsequent sections.

### B. Access for National Origin Minority Students with Limited English Language Skills

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
List of programs with selective admissions (application process that may result in more applicants than available slots)			
Copies of blank supplemental application forms for selective programs			
Promotional materials for selective programs (including brochures or flyers describing or advertising CTE programs)			

List of programs with selective admissions due to academic requirements such as minimum English proficiency			
Procedures for determining how students are accepted to programs with numerical or academic limitations (including any ranking instruments used)			

### C. Counseling and Prospects for Success

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Samples of counseling materials used, such as brochures, flyers, websites			
Any written counseling plans, policies, and procedures			
Qualitative information to provide	Response		Additional information (ie. Shared supporting documentation)
Describe the process to identify disproportionate program enrollment and steps for improvement. (For example, how does your entity become aware that the nursing program enrollment is majority female and the welding program is majority male? What steps are you taking to improve the enrollment?)			

## D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Counseling materials translated into other language			
Counseling materials specifically for English Language Learners (ELL)			
Counseling materials specifically for the hearing or visually impaired (including braille)			
Any written counseling plans, policies, and procedures			
List of interpretive services available to students with limited English-speaking ability			
List of interpretive services available to students with a hearing impairment or visual impairment			

  

Qualitative information to provide	Response	Additional information (ie. Shared supporting documentation)
Describe the process for potential and enrolled students to become proficient in English language skills		

## E. Recruitment and Promotional Activities

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Examples of recruitment materials, including brochures, Facebook, newspaper advertising			
Examples of promotional efforts (e.g., career days)			
Marketing plan/calendar of recruitment events and outreach activities (if available)			
List of CTE student organizations			

## Physical accessibility

CRALEO will reach out to request these materials, if needed.

## Comparable facilities

CRALEO will reach out to request these materials, if needed.

## 5. Services for Students with Disabilities

Materials to provide	Where document(s) is uploaded/How was it shared with CRALEO	Link to where it is found on website	Optional Notes/Explanation(s)
Website, flyers, or any information provided to students with disabilities regarding policies and procedures for receiving accommodations			
List of assistive technology available to students with a disability who need special accommodations or assistance to succeed in a CTE program			
List of supplementary aids and services available to students with a disability who need special accommodations or assistance to succeed in a CTE program			