



Civil Rights Compliance Review (CRCR)

Coordinator's Manual

2023-2024 Edition

Michigan Department of Education
Office of Career and Technical Education

Mission: To prepare students so they have the necessary academic, technical, and work behavior skills to enter, compete, and advance in education and their careers.



Statement of Assurance of Compliance with Federal Law

The Michigan Department of Education, Office of Career and Technical Education, complies with all Federal laws and regulations prohibiting discrimination and with all requirements and regulations of the U.S. Department of Education. It is the policy of the Office of Career and Technical Education that no person on the basis of race, color, religion, national origin or ancestry, age, gender, 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 U.S. Department of Education.

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I. Overview of Civil Rights Compliance Program

The Michigan Department of Education (MDE), Office of Career and Technical Education (OCTE), as the state agency responsible for the administration of career and technical education (CTE), is required to adopt a compliance program to prevent, identify, and remedy discrimination on the basis of race, color, national origin, gender/sex, disability, or age by its subrecipients. (A “subrecipient” in this context is a local educational agency (LEA), intermediate school district (ISD), postsecondary institution, state operated educational program or CTE center that receives any federal financial assistance through a state agency.)

The Civil Rights Compliance Program is a comprehensive review system designed to assure equal opportunity for all groups and populations and improve the delivery of career and technical education. Activities of this program 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.

A. Purpose

The purpose of this section is to outline Michigan’s activities in the Civil Rights Compliance Program. Listed below are the components of the compliance program required by the *Guidelines* and the corresponding activity of Michigan’s program designed to fulfill these requirements.

<u>Activities</u>	<u>Components</u>
Selecting Agencies for On-Site Review:	<p>State agencies must use criteria that, to the maximum extent possible, target those subrecipients/state operated programs (SOPs) for on-site reviews that have the greatest potential for civil rights noncompliance. State agencies’ targeting plans are subject to review and approval by the United States Department of Education/Office for Civil Rights (USDE/OCR).</p> <p>In developing targeting procedures, state agencies must continue to analyze data to identify programs that disproportionately enroll students who belong to one of the protected classes, as defined by civil rights legislation. State agencies may also incorporate relevant program performance standards in federal career and technical education laws and regulations as part of their targeting criteria. Additionally, in</p>

targeting on-site reviews, state agencies may use selection criteria that take into account the size or complexity of the reviews. Such factors may include, but are not limited to, the number and distribution of sites, types of student populations, and the mix of geographic and demographic characteristics. The date when the state conducted its last on-site review of the subrecipients and/or state operated program may also be considered.

Targeting Analysis:	Collecting and analyzing enrollment and program completion information that the subrecipients to be visited have previously submitted to the state under existing authorities.
On-Site Review:	Conducting compliance reviews of selected subrecipients (i.e., an investigation of a subrecipient to determine whether it engages in unlawful discrimination in any aspect of its program.)
Compliance Plan:	Notifying the subrecipient of steps it must take to attain compliance and attempting to obtain voluntary compliance upon finding unlawful discrimination.
Technical Assistance:	Providing technical assistance, upon request, to subrecipients. This includes assisting subrecipients to identify unlawful discrimination and instructing them in remedies for, and prevention of, such discrimination.
Reporting:	Reporting selection, targeting, on-site reviews, compliance plans, and technical assistance activities to USDE/OCR.
Program Improvement:	Recognizing positive outcomes of successful implementation of programs that provide equal opportunity for all groups and populations.

B. Basic Goals Guiding These Activities

This program is designed to:

1. Assure that equal educational opportunities are provided to all students, including full opportunity to participate in programs, activities, job opportunities and to benefit from services.
2. Prohibit barriers to achieving full participation, including the stereotyping of individuals based on their race, ethnicity, gender/sex identity, age, or disabling condition.

3. Provide education in an integrated setting.
4. Analyze, identify, and change policies and activities that impede the achievement of the above goals.

Any questions regarding the compliance program should be directed to: Office of Career and Technical Education, Michigan Department of Education, Post Office Box 30712, Lansing, MI 48909, by telephone 517-241-2091, or by email at whittakerj@michigan.gov.

II. TECHNICAL ASSISTANCE AVAILABLE

To assist Educational Agencies (EAs) in implementing the Review Process, OCTE provides the following technical assistance sessions:

A. Civil Rights Technical Assistance Workshop

Pre-Onsite Visit Inservice

A workshop review to explain and clarify procedures for monitoring compliance with the Office for Civil Rights Guidelines is conducted for representatives of local educational agencies that are selected for the agency-level.

It is recommended that a team of at least two persons be selected to provide leadership for the review at the local level. These persons should be familiar with 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, Title II of the Americans with Disabilities Act of 1990, Office for Civil Rights Guidelines, career and technical education (CTE) and other federally funded programs.

Specific details for participation in the in-service workshop and the notification of selection for agency-level reviews are sent directly to chief administrative officers of each agency.

Tentative Agenda Items

Information disseminated during the workshop will include the following topics:

1. Goals and Objectives of the Workshop
2. Overview of Civil Rights Compliance
3. Educational Agency Responsibilities
4. Explanation of the On-Site Review Process
5. Coordinator's Manual
6. Technical Assistance Guide
7. Evaluation of In-service Workshop

B. Civil Rights Compliance Plan Writing Workshop

A workshop will be held upon request following the completion of the on-site visits to assist EAs in writing their Civil Rights Compliance Plan. Group and individual assistance will be provided to assist agencies to address the violations indicated in the Civil Rights Letter of Findings.

III. 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)

Title IX of the Education Amendments of 1972, as amended, is designed to eliminate (with certain exceptions) discrimination on the basis of sex/gender in any education program or activity receiving Federal financial assistance, whether or not such program or activity is offered or sponsored by an educational institution as defined in part 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))

Part 104 of 34 CFR effectuates Section 504 of the Rehabilitation Act of 1973, which is designed to eliminate discrimination on the basis of disability. On October 29, 1992, the Rehabilitation Act Amendments of 1992 had three significant consequences relative to Section 504: (1) the term “disability” replaced the term “handicap,” (2) certain conditions were explicitly excluded from the definition of “disability,” and (3) complaints alleging employment discrimination under Section 504 were to be judged by the Standards of Title I of the Americans with Disabilities Act (ADA).

TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990 (ADA) (as amended)

“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)

28 C.F.R. part 35, effectuates Title II of the Americans with Disabilities Act of 1990, which is designed to eliminate discrimination by public entities on the basis of disability.

State of Michigan Civil Rights Legislation

This legislation is provided for your information and assistance as you evaluate local policy. Compliance with state law will **not** be formally assessed during a review by MDE/OCTE.

ELLIOTT-LARSEN CIVIL RIGHTS ACT

This act prohibits discriminatory practices, policies, and customs based upon religion, race, color, national origin, age, sex, height, weight, familial status, or marital status.

Article 1, Section 102(1)

"The opportunity to obtain employment, housing, and other real estate, and the full and equal utilization of public accommodations, public service, and educational facilities without discrimination because of religion, race, color, national origin, age, sex, height, weight, familial status, or marital status as prohibited by this act, is recognized and declared to be a civil right."

Article 4, Sec. 402

"An educational institution shall not do any of the following:

- (a) Discriminate against an individual in the full utilization of or benefit from the institution, or the services, activities, or programs provided by the institution because of religion, race, color, national origin, or sex.
- (b) Exclude, expel, limit, or otherwise discriminate against an individual seeking admission as a student or an individual enrolled as a student in the terms, conditions, or privileges of the institution, because of religion, race, color, national origin, or sex.
- (c) For purposes of admission only, make or use a written or oral inquiry or form of application that elicits or attempts to elicit information concerning the religion, race, color, national origin, age, sex, or marital status of a person, except as permitted by rule of the commission or as required by federal law, rule, or regulation, or pursuant to an affirmative action program.
- (d) Print or publish or cause to be printed or published a catalog, notice, or advertisement indicating a preference, limitation, specification, or discrimination based on the religion, race, color, national origin, or sex of an applicant for admission to the educational institution.
- (e) Announce or follow a policy of denial or limitation through a quota or otherwise of educational opportunities of a group or its members because of religion, race, color, national origin, or sex."

Persons with Disabilities Act 220 of 1976

This act defines the civil rights of persons with disabilities; to prohibit discriminatory practices, policies, and customs in the exercise of those rights; to prescribe penalties and to provide remedies; and to provide for the promulgation of rules.

37.1102 Opportunity guaranteed; civil right; accommodation of person with disability; undue hardship.

Sec.102.

(1) The opportunity to obtain employment, housing, and other real estate and full and equal utilization of public accommodations, public services, and educational facilities without discrimination because of a disability is guaranteed by this act and is a civil right.

(2) Except as otherwise provided in article 2, a person shall accommodate a person with a disability for purposes of employment, public accommodation, public service, education, or housing unless the person demonstrated that the accommodation would impose an undue hardship.

Article 4

37.1401 "Educational institution" defined.

Sec.401. As used in this article, "educational institution" means a public or private institution or a separate school or department of a public or private institution, includes an academy, college, elementary or secondary school, extension course, kindergarten, nursery, school system, school district, or university, and a business, nursing, professional, secretarial, technical, or vocational school, and includes an agent of an educational institution.

37.1402 Educational institution; prohibited conduct.

Sec. 402. An educational institution shall not do any of the following:

(a) Discriminate in any manner in the full utilization of or benefit from the institution, or the services provided and rendered by the institution to an individual because of a disability that is unrelated to the individual's ability to utilize and benefit from the institution or its services, or because of the use by an individual of adaptive devices or aids.

(b) Exclude, expel, limit, or otherwise discriminate against an individual seeking admission as a student or an individual enrolled as a student in the terms, conditions, and privileges of the institution, because of a disability that is unrelated to the individual's ability to utilize and benefit from the institution or because of the use by an individual of adaptive devices or aids.

(c) Make or use a written or oral inquiry of form of application for admission that elicits or attempts to elicit information, or make or keep a record, concerning the disability of an applicant for admission for reasons contrary to the provisions or purposes of this act.

(d) Print or publish or cause to be printed or published a catalog or other notice or advertisement indicating a preference, limitation, specification, or discrimination based on the disability of an applicant that is unrelated to the applicant's ability to

utilize and benefit from the institution or its services, or the use of adaptive devices or aids by an applicant for admission to the educational institution.

(e) Announce or follow a policy of denial or limitation through a quota or otherwise of educational opportunities of a group of its members because of a disability that is unrelated to the group or member's ability to utilize and benefit from the institution or its services, or because of the use by the members of a group or an individual in the group of adaptive devices or aids.

(f) Develop a curriculum or utilize textbooks and training or learning materials which promote or foster physical or mental stereotypes.

IV. ON-SITE REVIEW PROCESS

The on-site review is the visitation by monitors for the purpose of determining compliance with Civil Rights Guidelines to the local educational agency that is a recipient of federal funds. The Civil Rights Compliance Review (CRCR) Team will observe situations, review records and materials, and evaluate input provided by agency staff in order to determine whether procedural requirements for each of the regulations and guidelines have been or are being met and determine whether deviations that surfaced during the targeting analysis are, in their opinion, the result of unlawful discrimination.

The OCTE conducts on-site reviews annually. From each category of local educational agencies, a minimum of 2.5 percent will be reviewed on site. A CRCR team of two or more members will be assigned to review a site for a one, two, or three-day period based on the size of the local educational agency, and the complexity and organization of the review.

A. Notification

Chief Administrative Officers of agencies selected for on-site reviews will be notified by letter, usually in the late spring or early summer, but never less than 30 days prior to each on-site review.

The OCTE sponsors an in-service training for all educational agencies targeted for the next review cycle. This in-service will explain the details of the review and discuss the necessary preparations. At the in-service, the participants designated by the Chief Administrative Officer, will be provided with a *Technical Assistance Guide* outlining the details of the civil rights program and this *Coordinator's Manual* to assist with the preparations for the on-site visit.

B. Pre-review Activities

The local coordinator(s) for the educational agency will make arrangements for the on-site review. The proposed plans will be shared with the OCTE Civil Rights Compliance Review Team leader for approval. Specific scheduling and arrangement considerations include:

Local Coordinator's Responsibilities

Detailed arrangements for the on-site review are the responsibility of the local coordinator(s).

1. Notification

It is important that the coordinator(s) notify all staff in the agency, area center, or consortium that an on-site review will be conducted. Allow approximately two weeks notification prior to the scheduled on-site date. Notifying school staff in writing is helpful, as well as indicating that staff members will be actively participating in the on-site review.

2. Planning

The local coordinator(s) will plan and schedule the on-site review with the size of the agency in mind. Generally, most on-site reviews will be:

- ✦ Conducted in a single day
- ✦ Conducted by an OCTE team

Large school districts, some area centers, consortia, or postsecondary institutions may be scheduled for a two- to three-day visit, based on the complexity of the size of their organization. OCTE will provide guidance in these situations.

a. Agenda

Local coordinator(s) will make **all** arrangements for the on-site review well before the date of the review. The proposed agenda is to be **forwarded to the MDE - OCTE for approval by September 28, 2023. See specific guidance on preparing agendas for a site visit and [sample agendas](#).**

b. Maps

Local coordinator(s) will provide a map for the review team that includes directions to the location of the Entrance Interview from the nearest highway, including building address, designation of main or preferred entrance to the building and a contact phone. A local map showing the locations of all district buildings should be included, along with facility floor plans for those buildings housing CTE programs, coordinators offices, or offices of persons part of any appeal process. If you are unsure which to include, please contact the OCTE for assistance. **Upload the maps, directions, and floor plans to OCTE by the deadline specified.**

- c. Pre-visit information form. This form lists all facilities, parking lots, and includes the date construction began for each building or addition. **Due to the OCTE by September 28, 2023.**

Please refer to the coordinator(s) checklist on the following page for specific activities required to prepare for the review.

3. Preparing for the On-Site Visit

Coordinator(s) Checklist

Tasks to be Completed (Identify person responsible for each task listed below.)	Date Completed	Completed by: (name)
Develop agenda based on selected template from manual.		
By September 28, 2023 , a detailed agenda for the day was uploaded to GEMS (see below).		
Driving directions and entrance interview location (map) have been uploaded to Pre-Onsite Form by September 28, 2023 .		
Pre-onsite information form has been completed (including exact date construction or additions were begun) and uploaded to OCTE by September 28, 2023 .		
Appropriate documents have been identified for each item to be reviewed.		
Appropriate documents assembled in order by file, etc.,		
Main contact person for each box, file, etc., is identified and contact information is noted (phone or room number).		
Facility review has been scheduled per the agenda. Facility manager, or designee, is confirmed available to accompany reviewer.		
Security personnel, if any, have been notified of the date and time of the CRCR visit and whom to expect.		
All staff, teachers, and administrators have been notified of the date and time of the CRCR visit, and what to expect.		
Appropriate staff have been identified and notified of Entrance/Exit.		
All students have been notified of the CRCR visit, and what to expect.		
All students, staff have been informed that they will be asked to complete a confidential on-line survey. (The URL will be forwarded by OCTE.)		
A method to distribute the survey URL has been determined that will reach students, staff, and other concerned parties (school board, parents, boosters, advisory committees, etc.)		
Coverage has been arranged, as needed, agency staff identified for the exit interview as needed.		
Arrangements have been made for a room for the entrance and exit interviews.		
Arrangements have been made with district personnel who will preside over the entrance/exit interviews.		

4. Document Organization

Compile and assemble all requested materials, documents, and records in an electronic format.

Failure to meet this request may result in an extended or postponed review.

5. Organizing Room/Space Requirements (as needed)

Documents Reviewer	Documents will be reviewed by the Document Reviewers through the Grant Electronic Monitoring System (GEMS).
Facilities Reviewer	One person to accompany with keys and access to all areas of the building interior and exterior. Person should have extensive knowledge of the facility and district maintenance procedures .

Please designate **one area for state CRCR Team meetings** prior to the entrance interview, for team meetings, and to compile reports, for the Team to use for the CRCR review time period.

6. Facility Review Considerations

Every attempt will be made to make the assessment of facilities as unobtrusive as possible. An on-site review team member would like to observe every facility in all buildings. **This may not be possible, however. They will especially wish to see:**

- ✦ Career and Technical Education Classrooms – **while classes are in session**
- ✦ Career Resource Centers
- ✦ Guidance and Counseling Centers (offices)
- ✦ Placement Offices
- ✦ Special Resource Centers – Student Services
- ✦ Special Facilities/Equipment – for Disabled, Bilingual, or other Special Needs Groups.
- ✦ Public areas: Library, Offices, Cafeteria, Auditoriums, etc.
- ✦ Offices of Coordinators and other agency personnel who are a part of the grievance procedure, including spaces that may be commonly used to meet with complainants, waiting areas, and related services such as parking, restrooms, etc. in these locations.

C. Entrance Interview

On-site reviews will be conducted during normal working hours. They will begin at the agency administrative office, or other designated location, with an Entrance Interview with the Chief Administrative Officer, or designee, and others whom they invite. This meeting will be conducted by the CRCR Team Leader and the local coordinator(s) and **should not exceed one hour**. It is expected that the Chief Administrative Officer, or designee, will open the meeting. The purpose of this meeting is to:

- ✦ Introduce CRCR Team members and LEA personnel.
- ✦ Acknowledge appreciation for the effort put into preparing for the visit.
- ✦ Provide additional demographic information about the agency for the CRCR Team.
- ✦ Provide background information concerning the authority and components and procedures of any compliance plan.
- ✦ Explain the OCTE philosophy regarding the compliance review process.
- ✦ Provide an overview of on-site activities.

1. Local Coordinator's Responsibilities for the entrance interview:

- a. Extend **invitations** to the Superintendent, directors, and other staff members the administration feels may be interested in the review.
- b. Determine **time and location** of the entrance interview and add it to the prepared agenda. (Please note: the **amount** of time allotted for activities on the *Sample Agendas*, to be found later in this document, are **not** to be changed.) Driving time from Lansing should be considered when selecting a starting time, but start **no later** than 9:00 a.m.
- c. Prepare and deliver **brief opening remarks** for the local coordinator(s), or another local administrator, to call the Entrance Interview to order.
- d. Arrange presentation of **a brief overview** of the local agency by appropriate agency personnel to explain such things as the:
 - ✦ General philosophy of the agency
 - ✦ Size and demographics of the school population
 - ✦ Type of CTE programs and related services offered
 - ✦ Strong points and problem areas, if any, of the agency

2. OCTE's CRCR Leader's Responsibilities

- a. **Introduce** all state CRCR team members by name and title.
- b. **Explain** the overall plan and procedures for monitoring on-site.
- c. **Respond** to questions about the civil rights process or the on-site review.

D. Documentation Review

1. Purpose

The purpose of the documents review is to ascertain the agency's compliance with Federal Regulations for 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, Title II of the Americans with Disabilities Act of 1990, and *Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Disability*.

2. Local Coordinator's Responsibilities for the Documents Review

The local coordinator(s) will compile or have compiled and assembled a set of documents for review as identified in the Document Review section (Section VI beginning on page 28). These documents must be available electronically for submission to the Grant Electronic Monitoring System (GEMS). Documents should be labeled, page-flagged, and highlighted as applicable. Additional instructions are available in Section VI. Documents are reviewed at the district level, as well as building level.

3. Online Individual Interviews

Note: Interviews with staff and students are an important part of the review process. We currently employ available technology to expedite this portion of the review. The OCTE review team has found that this method is less disruptive and provides a better picture of compliance at the agency.

Coordinator's Responsibilities:

- Explain to all stakeholders (district personnel, students, parents, and others) the purpose of the survey, which is to gather data about the current status of the district.
- Prepare a method to distribute the survey URL (address) that will be provided by the OCTE to all district staff including administrators, counselors, and support personnel. Parents and other interested parties may be included.
- Encourage and remind staff, students, and others to participate in the survey prior to the survey close date.

The OCTE will monitor survey participation and inform you if an insufficient number of agency participants has completed the survey. Students must have access to the survey.

At minimum, the following staff (when they exist at the agency) should participate in the on-line survey at School Districts, State Operated Schools, Career Centers, and Intermediate School Districts:

- ✦ Superintendent
- ✦ CTE Director
- ✦ High School Principal(s)
- ✦ Campus Administrator(s)
- ✦ Counselors
- ✦ CTE Instructors
- ✦ Title II Coordinator
- ✦ Title VI Coordinator
- ✦ Title IX Coordinator
- ✦ Section 504 Coordinator
- ✦ Special Education Director
- ✦ Academic Teachers

If an individual fulfills multiple roles, only one survey is necessary with that individual. Additional interviewees may be included from the following categories: paraprofessional staff, clerical staff, parents, governing board members, advisory committee members, support staff, or other agency personnel.

Postsecondary institutions, and some state operated programs may have different titles for these individuals; however, the functions performed by those in the position will be similar, e.g., Superintendent/College President, CTE Director/Occupational Dean/School Principal.

F. Facility Review and Observations

1. Rooms and Centers

All buildings and centers, especially those where CTE classes are held, should be available for observation and review.

2. Time

Expect the building(s) assessment to take at **least** 4 hours. Depending on the size of the buildings and campus visited, additional time may be required.

G. Team Review Meetings

1. Purpose and schedule

The CRCR Team may need to meet privately at the beginning of the day and just prior to the Exit Interview to discuss the review and compile the results. Expect the Team to arrive 15-20 minutes **prior** to the scheduled time for the entrance interview. The local coordinator(s) should schedule a private room for this meeting, usually the same room used for any additional document review.

The team will take a lunch hour, most likely off-site. Although local restaurant recommendations are appreciated, the team often uses this time as a working lunch, so it would usually be inappropriate to include local agency personnel.

2. Exit interview preparation

Prior to the exit interview, the team may need to meet for approximately one-half hour to 45 minutes. A private room other than the one scheduled for the exit interview will be needed for this meeting.

H. Exit Interview

1. Purpose

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

- ✦ Preliminary impressions of on-site findings
- ✦ Timelines for the written report
- ✦ Procedures for contesting decisions
- ✦ An opportunity to evaluate the on-site review process.

2. Attendees

The local administration will select those who attend this meeting. It is recommended that those who attend the entrance interview be present for the exit interview, as well as any other staff members interested in the general findings of the CRCR Team. Because remedy for noncompliant items will be required, it is also recommended that persons empowered to facilitate anticipated change(s) be present.

The local coordinator, or another administrator, will open the meeting and re-introduce their local staff.

3. Time

Depending on the number of questions, expect the exit interview to take 30 minutes to an hour.

Please note that the number of days scheduled for each on-site review is based on the assumption that the necessary arrangements and preparations are made in advance. Failure to do so may result in an extension of the on-site review.

V. THE ON-SITE AGENDA

The local coordinator(s) should make all arrangements for the on-site review. An agenda will be developed in collaboration with OCTE staff specific to the agency being reviewed. Each agenda will consider the complexity of the review, number of facilities to be assessed, and other factors. This section provides the coordinator(s) with additional information necessary to begin to develop an agenda for their on-site review, as well as some examples. In developing the agenda, be sure to include the following components:

- ✦ Agency name, address, phone number, and review date
- ✦ Time, location, and rooms for:
 - Entrance interview
 - CRCR Team Room
 - Exit interview
- ✦ Facility accessibility review
- ✦ Off-site lunch (1 hour) and CRCR Team review

NOTE: See the Room Requirements Chart on page 12

A. Civil Rights Compliance Review (CRCR) Team Members

The number of CRCR Team members assigned to conduct the on-site review will depend on the number of sites being visited and the corresponding number of buildings to be assessed. The local coordinator(s) and OCTE staff will collaborate to develop their unique review agenda, which will inform the agency of the plans and personnel for the visit.

B. Length of Review

In collaboration with OCTE staff, the local coordinator(s) will develop a one, two, or three-day schedule within the parameters provided by the OCTE. In most cases, a one-day review will be scheduled. If there are many facilities within a district being reviewed, the OCTE will work with your agency to schedule the facility reviews at multiple sites. Participation of local personnel with knowledge of the various facilities will expedite this part of the review process. Other components of the review may occur concurrently, or at the beginning or end of the time scheduled for facilities review.

C. Scheduling Times

The following Agendas templates are provided as samples. The EA coordinator(s) should expect to spend time gathering the basic information needed, and then will collaborate with OCTE staff to determine the **best** schedule for their individual institution. Although start and end times may be modified to fit the agency schedule, and OCTE staff travel, the amounts of time allotted for individual activities within the review are not usually changed.

Note: All agency stakeholders will be invited to participate in an on-line interview survey prior to the date of the on-site. It is the local Coordinators responsibility to assure that the link to the survey is distributed in a timely manner.

**Sample Agenda a Comprehensive High School
One day, one facility**

Educational Agency Name
Address
City, State Zip
Phone
Date

8:30-9:00	Entrance Interview – CRCR team and Designated District Personnel	Room _____
9:00–11:30	Facility Review, including grounds	<i>With Facilities Manager</i>
11:30–12:45	CRCR Team Lunch	Off-site
12:45-2:00	Facility Review continues as needed	
2:00-2:30	CRCR Team meeting: compilation	Room _____
2:30-3:30	Exit Interview: CRCR Team and Designated District Staff	Room _____

**Sample Agenda B Comprehensive High Schools
Option B
Two-day on-site as identified by OCTE, multiple facilities**

Educational Agency Name
Address
City, State Zip
Phone

Day One

- | | | |
|-----------|--|--------------------------------|
| 1:00-1:45 | Entrance Interview – CRCR Team and Designated District Personnel | Room _____ |
| 1:45-4:00 | Facility Review, facility one, including grounds | <i>With Facilities Manager</i> |
| 4:00-4:30 | Brief meeting with site coordinator(s) to confirm arrangements for following day | |

Day Two

- | | | |
|-------------|--|--------------------------------|
| 8:30-11:30 | Facility Review, facility two | <i>With Facilities Manager</i> |
| 11:30-12:30 | OCTE Team Lunch and conference | |
| 12:30-2:00 | Facilities review continues | |
| 2:00-2:30 | CRCR Team meeting: compilation | Room _____ |
| 2:30-3:30 | Exit Interview CRCR Team and Designated District Staff | Room _____ |

**Sample Agenda Area Career Center Option C
One facility**

CTE Center Name
Address
City, State Zip
Phone
Date

8:00-8:45	Entrance Interview – CRCR Team and Designated District Personnel	Room _____
8:45-11:30	Facility Review, including grounds	<i>With Facilities Manager</i>
11:30-12:45	CRCR Team Lunch & Consultation	Off site or Culinary Arts "To Go"
12:45-2:00	Facilities Review continues as needed	
2:00-2:15	CRCR Team meeting: compilation	Room _____
2:15-3:15	Exit Interview - CRCR Team and Designated District Staff	Room _____

Sample Agenda D

Facility Name
Address
City, State Zip
Phone
Date

- | | | |
|-------------|---|--------------------------------|
| 9:00-9:30 | Entrance Interview – CRCR staff and Designated Facility Personnel | Room _____ |
| 9:30-11:00 | Facility Review, including grounds | <i>With Facility Personnel</i> |
| 11:00-12:15 | CRCR Team Lunch | Off-site |
| 12:15-2:15 | Facility review continues | <i>With Facility Personnel</i> |
| 2:15-2:30 | Team Meeting | Room _____ |
| 2:30-3:30 | Exit Interview
CRCR Team and Designated Facility Staff | Room _____ |

**Sample Agenda E Community College (multiple-day visit)
On-site of main campus and one satellite**

Community College Name
Address
City, State Zip
Phone

Day 1 Date

1:00-1:45	Entrance Interview – CRCR Team and Designated Agency Personnel	Room _____
2:00-4:00	Facility Review-satellite campus	<i>With Facility Manager</i>
4:00-4:15	Meeting with Coordinator(s) or designee to confirm arrangements for following day	

Day 2 Date

8:30-12:30	Facility Review, including Grounds	<i>With Facilities Manager</i>
12:30-1:45	CRCR Team Lunch	Off site
2:00-3:30	Facility Review continues	<i>With Facilities Manager</i>
3:30-4:00	OCTE Team Meeting	
4:00-5:00	Exit Interview	Room

VI. DOCUMENTATION REVIEW

The following materials, documents, and records **are to be compiled and submitted electronically in the Grant Electronic Monitoring System (GEMS)** prior to the Civil Rights Compliance Review. Please note that the number of days scheduled for each on-site review is based on the assumption that the necessary arrangements and preparations will be made. Failure to do this may result in an extension of the on-site review. **Student’s Personally Identifiable Information (PII) must be redacted.**

It is best to create electronic folders and **label the folders with the title shown on the chart below. For example, the file folder should be the EXHIBIT LETTER and then the documents within the folder should be named accordingly with dates as required (ex: A_Assurances). It may be necessary to use sub-folders within the main file folder.** If exhibits include documentation that has already been presented, include a notation to that effect, with a reference to the prior location or you may upload the materials in each folder. If the agency does not have the required evidence, include a notation of that fact.

For comprehensive publications, such as handbooks, use page flags and highlighting with specific publication and page notations in the individual folder(s).

Please do not include documents or items that are not requested or are not relevant to the item. In all cases, referring to the identically lettered section of the technical assistance guide will assist in the identification of what is required.

Labels	Documents/Records	Done
Exhibit A: Assurances	Copies of assurances filed for Title VI of the Civil Rights Act of 1964 with Michigan Department of Education. <i>If you cannot locate file copies, a new assurance may be filed (see section A of the Technical Assistance Guide)</i>	<input type="checkbox"/>
	Copies of assurances filed for Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and the Boy Scout of America Equal Access Act of 2001 with the U.S. Department of Education. <i>If you cannot locate file copies, a new assurance may be filed (see section A of the Technical Assistance Guide)</i>	<input type="checkbox"/>

<p>Exhibit B: Policy Adoption</p>	<p>Board-adopted policy statement of nondiscrimination for: Title VI Title IX Section 504 Title II (ADA) Sexual Harassment</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
	<p><i>Agenda and minutes of Board meeting during which each of the policies of nondiscrimination and sexual harassment were adopted. Minutes should specifically reference the policies. If policy numbers only are used in the minutes and agenda, please also provide copy of the policy documents. See section B of the Technical Assistance guide for requirements.</i></p>	
<p>Exhibit C: Specific Employee Designation</p>	<p>Evidence of coordinator designation (<i>board minutes of appointment, letters of designation, job or position description, job posting, etc. for each coordinator</i>) for: Title II Title IX Section 504</p> <p><i>See section C in the Technical Assistance Guide for description of the coordinator requirements.</i></p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
<p>Exhibit D: Notice of Nondiscrimination</p> <p>Sample documents that represent continuous publication for the <u>past three (3) years</u>.</p>	<p>Documents and publications that contain a notice of nondiscrimination for Title II, Title VI, Title IX, and Section 504.</p> <p><i>Please flag pages and highlight Nondiscrimination notices. See Technical Assistance Guide, Section D for description of this item.</i></p> <p>Required</p> <ul style="list-style-type: none"> • Student/parent handbooks • Employee handbooks • Course catalogs • Program/employee application forms • Recruitment materials for students • Recruitment materials for employees <p>Optional</p> <ul style="list-style-type: none"> • Newspapers/magazines • Newsletters/memoranda • Employment Bulletins/position postings • Other written communications 	<p><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>

<p>Sample E: Annual Public Notification of Opportunities in Career and Technical Education</p>	<p>Public notification provided to all households in the attendance area issued prior to the beginning of each school year, including examples in:</p> <ul style="list-style-type: none"> • Local newspapers • Agency publications <ul style="list-style-type: none"> • Other media <p><i>Must contain each of the required elements. See section E in the Technical Assistance Guide.</i></p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<p><i>Note: In consortia or cooperative CTE delivery arrangements, this may be a shared notice.</i></p> <p><i>Three years of annual notification in actual publications, showing dates should be provided.</i></p>	<p>must include:</p> <ul style="list-style-type: none"> • A summary of program offerings (not classes) • Admission criteria for programs • Name/title, address, and telephone number of Title VI, Title IX, Section 504, and Title II coordinators • Assurance that the lack of English skills will not be a barrier to participation <ul style="list-style-type: none"> Agency Nondiscrimination statement <p>Example(s) of annual public notification of CTE opportunities written in a language or media other than English, if applicable.</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

<p>Exhibit F: Adoption and Publication of Grievance Procedures</p> <p><i>Please flag and highlight in actual publications. Three years of dated publications should be provided.</i></p> <p><i>You need not supply multiple publications for individual items, as long as a list is in this folder indicating where to locate these items in the actual booklets or manuals.</i></p>	<p>Copy of Board-adopted grievance procedures for:</p> <ul style="list-style-type: none"> • Title II • Title IX • Section 504 • Title VI (not required, but highly recommended) <p>Agenda /minutes of Board meeting during which grievance procedures were adopted for each regulation.</p> <ul style="list-style-type: none"> • Title II • Title IX • Section 504 • Title VI (not required, but highly recommended) <p>Agency’s actual publications containing grievance procedures for:</p> <p>Title II</p> <p>Title IX</p> <p>Section 504</p> <p>Title VI (not required but highly recommended)</p> <p>Published in, but not limited to, the following:</p> <ul style="list-style-type: none"> • Student handbook/Parent handbook • Employee handbook or bulletin board announcement • Course catalog/course offering booklet • Newspapers/newsletters • Memoranda/bulletins • Other _____ <p>(May be duplicates of those listed for Exhibit D.)</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> <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>Exhibit G: (Optional) Self-Evaluations for Title IX, Section 504, and Title II</p> <p><i>These are not required but may be supplied if desired.</i></p>	<p>Copy of Executive Summary of Self-Assessment or Self-Assessment for:</p> <p>Title IX Section 504 Title II</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
<p>Exhibit H: Accommodations for Persons with Disabilities</p> <p><i>Provide evidence of all that are available.</i></p> <p><i>This could be in list form, an announcement from your ISD on the availability to your district, invoices for equipment, etc.</i></p>	<p><u>Aural Deliveries</u> 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</p>	<p><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"/></p>
	<p><u>Visual Deliveries</u> List of qualified readers Taped texts Audio recordings Brailled materials Large-print materials Other effective methods of making visually delivered materials available</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
	<p>Acquisitions or modifications of equipment or devices.</p>	<p><input type="checkbox"/></p>
	<p>Location and description of any facilities modified to be accessible to individuals with disabilities.</p>	<p><input type="checkbox"/></p>
	<p>Descriptions and dates of alterations to the physical facility to eliminate barriers (Transition Plan).</p>	<p><input type="checkbox"/></p>

<p><i>Lists of interpreters and translators, services available from ISD or another agency.</i></p> <p>K-12 only</p> <p><i>Obtain from Special Education.</i></p> <p>K-12 Only</p> <p><i>County level or ISD efforts that feed into your district can be used here.</i></p>	<p>Description of the means used by counselors to communicate with students with hearing impairments.</p>	<input type="checkbox"/>
	<p>Identification of interpreter or other aids or services used by counselors to communicate with hearing impaired students.</p>	<input type="checkbox"/>
	<p>Identification of supplementary aids and services available for students with disabilities to participate in CTE programs.</p>	<input type="checkbox"/>
	<p>Number of students (NOT names) with disabilities enrolled in regular CTE.</p>	<input type="checkbox"/>
	<p>List of CTE related non-academic and extracurricular activities or services that have participants with disabilities. <i>(CTSO other)</i></p>	<input type="checkbox"/>
	<p>Description of the procedures taken to ensure that students with disabilities are placed with students without disabilities to the maximum extent appropriate. <i>(IEP procedures for CTE staff inclusion in meetings)</i></p>	<input type="checkbox"/>
	<p>Description of your Section 504 and IEP evaluation process. <i>Include copies of not less than five (5) individual 504 plans and five (5) IEPs for current CTE students (student names may be blacked out for privacy).</i></p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	<p>K-12: Documentation of agency efforts to annually identify persons with disabilities not receiving public education. <i>(Letters to non-public schools, notices, project "child find", etc.)</i></p> <p>Postsecondary: Document of procedures, and communication thereof, for students to self-identify as needing additional supports or accommodations.</p>	<input type="checkbox"/>
<p><i>Obtain also from special education.</i></p>	<p>Documentation of any notices and other safeguard procedures used in relation to students with disabilities.</p>	<input type="checkbox"/>

<p>Exhibit I: Promotional Activities (English Language Learners [ELL])</p>	<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"> • Brochures • Pamphlets • Bulletins • Memoranda <p><i>If none, simply indicate such.</i></p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<p><i>If your agency does not have language minorities enrolled, you must still indicate how you will provide services if they enroll.</i></p>	<p>Examples or descriptions of special materials used to recruit students who are English language learners:</p> <ul style="list-style-type: none"> • Posters • Displays • Bulletin boards 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<p><i>Eligibility of English Language Learners (ELL). If you have a coordinator for ELL services, they can provide this information.</i></p>	<p>K-12: Count of identified ELL/ESL students in district and CTE.</p> <p>Postsecondary: Count of ELL/ESL students in primary service area, and CTE courses</p> <p>Description of acceptable procedures/methods used to identify ELL students.</p>	<input type="checkbox"/> <input type="checkbox"/>
	<p>List of language-related support services provided for ELL/ESL students.</p>	<input type="checkbox"/>
	<p>Examples or descriptions of other provisions made, or steps taken to open all CTE programs to ELL students, such as: brochures, pamphlets, posters, bulletins, memoranda, displays or bulletin boards, etc., <u>especially designed</u> for ELL/ESL students.</p>	<input type="checkbox"/>
	<p>Count of ELL students vs. non-ELL students <u>by program</u> (CIP)</p>	<input type="checkbox"/>
	<p>When a concentration of ELL students exists in one or a few programs, demonstrate that such a concentration is not the result of unlawful discrimination.</p>	<input type="checkbox"/>
<p><i>Counseling ELL Students</i></p>	<p>Description of the means used by counselors to communicate with national origin minorities (ELL).</p>	<input type="checkbox"/>
	<p>Identification of interpreter or other aids or services used by counselors to communicate with ELL students.</p>	<input type="checkbox"/>

Exhibit J: Recipient Responsibilities (Counseling)	<u>Activities</u> Description of the pre-enrollment counseling given students.	<input type="checkbox"/>
<i>Counseling and Prospects for Success</i>	Description of career counseling and CTE program selection activities.	<input type="checkbox"/>
	Description of steps taken to provide students of all races, both genders/sexes, and with disabilities with information concerning CTE programs and career options.	<input type="checkbox"/>
	Descriptions of special supportive services provided by counselors for CTE /special populations students.	<input type="checkbox"/>
	Examples of information and materials sent to students' homes.	<input type="checkbox"/>
	Examples of materials used for career counseling and program selection, including EDPs, catalogs, career, or job descriptions, etc.	<input type="checkbox"/>
	Number of students by race/ethnic group, gender/sex, and disability enrolled in a CTE program offered or referred by the agency.	<input type="checkbox"/>
	Description of any steps taken to ensure that disproportionate enrollments in CTE of either sex, minority group, or disability are not the result of unlawful discrimination. (K-12 may check their Agency-Level Review Report in CTEIS.)	<input type="checkbox"/>
	For each CTE program, description of: <ul style="list-style-type: none"> • referral procedures, and • all established prerequisites 	<input type="checkbox"/> <input type="checkbox"/>
	Description of CTE program application process, including criteria for selection of students.	<input type="checkbox"/>
	Policies regarding CTE program enrollment.	<input type="checkbox"/>
	Examples of CTE programs: <ul style="list-style-type: none"> • referral forms • application forms • enrollment forms 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Exhibit K: Recruitment Activities	Identification of personnel active in recruitment and counseling activities by race, gender/sex, and disability.	<input type="checkbox"/>
	Description of recruitment activities for students.	<input type="checkbox"/>
	Description of special services or programs particularly designed to recruit race/ethnic groups, females/ males, or students with disabilities.	<input type="checkbox"/>
	Examples of materials used for recruitment/enrollment efforts: <ul style="list-style-type: none"> • brochures • posters • pamphlets • memoranda • displays or bulletin boards 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	Examples of descriptions of specific materials and procedures used to recruit students with disabilities.	<input type="checkbox"/>
	<i>Promotional Activities</i> Description of promotional efforts such as career days, parents’ night, assemblies, demonstrations, visitations by groups of prospective students, etc.	<input type="checkbox"/>
	List of any role models or other resources used.	<input type="checkbox"/>
Exhibit L: Job Placement, Apprenticeship Training Responsibilities, and Other Worksite Based Information	Number of students in CTE and job placement programs by race/ethnic group, gender/sex, and disability.	<input type="checkbox"/>
	Description of any steps taken to ensure that students are not unlawfully discriminated against in the above programs.	<input type="checkbox"/>
	For application and participation in each program, provide copies or descriptions of all: <ul style="list-style-type: none"> • policies • criteria • written procedures • application forms • agreements 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	Examples of contracts/written agreements used by the recipient for referral or assignment of students to work-based learning.	<input type="checkbox"/>
Exhibit M: Comparable Facilities	Location and description of any separate facility provided for the genders/sexes in CTE such as dressing rooms, showers, etc.	<input type="checkbox"/>

<p><i>Accessibility</i></p> <p>(Exhibit M continued) (special education can usually provide this)</p>	<p>Description of any modification of common facilities or equipment made to accommodate students of different sex in CTE.</p>	<input type="checkbox"/>
	<p>K-12: Description or examples of efforts and procedures the local agency used to:</p> <ul style="list-style-type: none"> • Identify qualified persons with disabilities <u>not receiving public education</u>; for example, <i>Child Find, Early On</i>, or comparable outreach; and, • Notify persons with disabilities and their parents or guardians of the agency’s duty regarding non-discrimination on the basis of disability. • Postsecondary: Document of procedures, and communication thereof, for students to self-identify as needing additional supports or accommodations. 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
	<p>Count of students by <u>disability category</u>.</p>	<input type="checkbox"/>
	<p>Descriptions of modifications or adaptations made to course offerings.</p>	<input type="checkbox"/>
	<p>Identification of instances when these <u>methods of accessibility</u> were used by your entity to eliminate barriers through:</p> <ul style="list-style-type: none"> • Descriptions and dates of instructional <u>program equipment redesign</u> (modifications or additions) • Schedules of <u>reassignments of aides to beneficiaries</u> • Schedule of <u>home visits</u> made • Tables of dates, services, and sites for the <u>delivery of services at alternate accessible sites</u> • Descriptions of accessible rolling stock or other conveyances used • Other (specify) <p>Description of <u>auxiliary or related aids and services</u> provided for students with disabilities in CTE programs.</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

VII. ON-SITE REVIEW REPORT

The *Onsite Review Report*, known as the Letter of Findings, provides the agency with a complete listing of the CRCR team's findings, including commendations and deficiencies. It contains recommendations for correcting any significant deficiencies.

A. Format

1. Introduction

The report leads off with a NOTE of explanation regarding the recommendations that become a part of a compliance plan. The body of the report that follows this NOTE is divided into two parts:

- I. PROCEDURAL REQUIREMENTS AND CR GUIDELINES
- II. AGENCY-LEVEL REVIEW FINDINGS.

Procedural Requirements are derived directly from 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, and Title II of the Americans with Disabilities Act of 1990. Civil Rights Guidelines pertain to *Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Disability (1979)*. Agency-Level Review Findings are derived from the analysis of enrollment and completion data, and data examined on-site.

2. Sections

The major parts of the report are presented in sections. Depending on whether items reviewed are found to be noncompliant, each section is divided into two or more parts: compliance items, findings, items of noncompliance, and suggestions.

- a. **Compliance items** reviewed. This refers to the legislation from which the requirements derive.
- b. **Findings** revealed by the review. These are statements of conditions at the time of the review.
- c. **Items of Non-compliance** state how to come into compliance when the agency is found non-compliant. Occasionally a suggestion will follow an item of non-compliance or a finding.
- d. **Suggestions** may or may not be offered. These will provide ideas for conducting activities efficiently and effectively to enhance compliance.

B. Report of Findings

Within 45 business days of the exit interview, the Letter of Findings, a written report of the onsite review, will be sent to the Chief Administrative Officer with copies to the Onsite Coordinator(s).

C. Appeals Process

Michigan school districts and other clients of the Michigan Department of Education shall have access to review procedures in regard to decisions and actions taken on monitoring visits and the enforcement of reporting requirements.

The procedures for notification and review of Letters of Finding are as follows:

1. An eligible recipient that intends to contest the Department's action shall notify the OCTE director in writing within 14 calendar days of receipt of the Department's findings. Within an additional 16 calendar days of receipt of the findings, the recipient shall submit a written request for review which shall state: (a) the finding of the Department that is in question, (b) the issues upon which the Department's finding is challenged, and (c) all pertinent facts related thereto.
2. Upon receipt of such a request, the OCTE director shall prepare a written reply in duplicate within 30 calendar days. Such a reply may include a change of position by the Department or an affirmation of its original position, in whole or in part.
3. Within 14 days of receipt of the reply from the Department, the party whose appeal has been denied shall indicate whether it wishes to continue a request for review by the Department. Such notification shall be sent to the OCTE director. If the timing of local board of education meetings prevents the recipient's party from acting within the allotted 14 days, the party shall send the OCTE director written notification of this fact within the initial 14-day period. A party providing this notification shall have a total of 30 days to submit a request for continued review.
4. Within 14 calendar days of receipt of notice requesting a further review of decision, a final meeting shall be scheduled. At this time, there shall be a discussion including the challenging party, the OCTE Director, appropriate OCTE staff, and/or the Deputy Superintendent of the MDE bureau or designee.
5. The OCTE Director or designee, may make a ruling based upon the facts presented or may convene a review panel of three members.
6. If a review panel is convened, within 14 calendar days of receipt of information and materials, the panel shall review the documentation and decision for the purpose of making one of the following recommendations to the OCTE Director:

- a. Further review is not warranted based upon the facts presented. The review should end. Original staff decision **is** supported.
 - b. Further review is warranted based upon the facts presented. Original staff decision is **not** supported.
 - c. Further review may be unwarranted because there is an alternative solution that can be suggested to the challenging parties. Original staff decision is **not** modified.
7. The Deputy Superintendent of the MDE bureau shall make a decision regarding the contested decision. All decisions are based on applicable laws and the policies of the Michigan Department of Education.

VIII. COMMENT FORM

COORDINATOR'S MANUAL for Civil Rights Compliance

Please return to
Office of Career and Technical Education/Civil Rights
P.O. Box 30712
Lansing, MI 48909
whittakerj@michigan.gov

Please use this form if you wish to question or comment upon any portion of the manual. Please indicate the following items for each statement made:

1. Page number
2. Section number
3. Question or comment
4. Rationale for modifications requested

Page and Section	Question/Comment	Rationale for Modification Requests

Copy form as needed.