



Methods of Administration (MOA): Onsite Civil Rights Review Process

Professional
Development and
Guidance

Purpose of the Methods of Administration Civil Rights Review?

- To ensure **Access** and **Equity** within career and technical education (CTE) programs
- To **Eliminate Discrimination** and **Denial** of **Services** on the basis of *race, color, national origin, sex, and handicap*

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Methods of Administration Civil Rights Review Process

In response to the **1979 Vocational Education Programs Guidelines** for **Eliminating Discrimination** and **Denial of Services** on the basis of the following categories:

- **Race**
- **Color**
- **National Origin**
- **Sex**
- **Handicap**

... each state submitted a plan to the U.S. Department of Education, Office of Civil Rights

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Laws and Regulations impacting the review process:

- Title VI of the **Civil Rights Act of 1964** (prohibiting discrimination based on race, color, and national origin) *34 CFR Part 100*
- Title IX of the **Education Amendments of 1972** (prohibiting discrimination based on sex) *34 CFR Part 106*
- Section 504 of the **Rehabilitation Act of 1973** (prohibiting discrimination based on disability) *34 CFR Part 104*
- Title II of the **American with Disabilities Act of 1990** (prohibiting discrimination based on disability) *28 CFR Part 35*
- Vocational Educational Guidelines for Eliminating Discrimination and Denial of Services on the **Basis of Race, Color, National Origin, Sex, and Handicap** (Guidelines) *34 CFR Part 100 Appendix B*

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How are schools identified for review?

- As a result of the state plan(s) submission, ISBE reviews secondary schools and IL Community College Board (ICCB) reviews post-secondary community colleges identified through each agency's risk assessment
- The risk assessment for secondary schools includes all schools that receive federal Perkins funds for CTE programs

*Note: ISBE's risk assessment is based on **disparities** and **gaps** in CTE participation among the applicable subgroups

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How are schools notified of the review?

- Selected schools are notified by the Illinois State Board via email and U.S. Mail of the upcoming review to the district superintendent. Additional information on the Methods of Administration process can be found at [Civil Rights Review for Secondary Education \(isbe.net\)](https://www.isbe.net/Pages/Civil-Rights-Secondary-Education.aspx)
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How many schools are reviewed each year?

- Currently, **15 secondary schools** offering career and technical education programs of study are reviewed

What happens once a school is notified of participation in the review process?

- ISBE notifies schools of their selection by **email and U.S. mail**. It is reiterated to schools via both avenues that the selection has occurred because the district was identified through the risk assessment and is not the result of something that school has done wrong
- Districts will be given access to an IWAS system that allows for the required evidence to be uploaded directly into the system. More information on required can be found at <https://ilequity.com/forms-resource>.
- Schools are asked to **appoint a contact person**. ISBE will codetermine an acceptable date for review.

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Desk Review/Interview with stakeholders including:

- Central/District office administration
- Building administration
- CTE teaching staff
- Section 504 Building Coordinator
- Special Education Administration Coordinator
- Teacher/Building Coordinator
- School Counselors
- CTE students

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What happens during a review?

The review is a three-step process, including:

1. A document review
2. A facility physical accessibility review
3. A desk review/interview

Each part is often conducted on separate days and typically requires no longer than two days of school collaboration

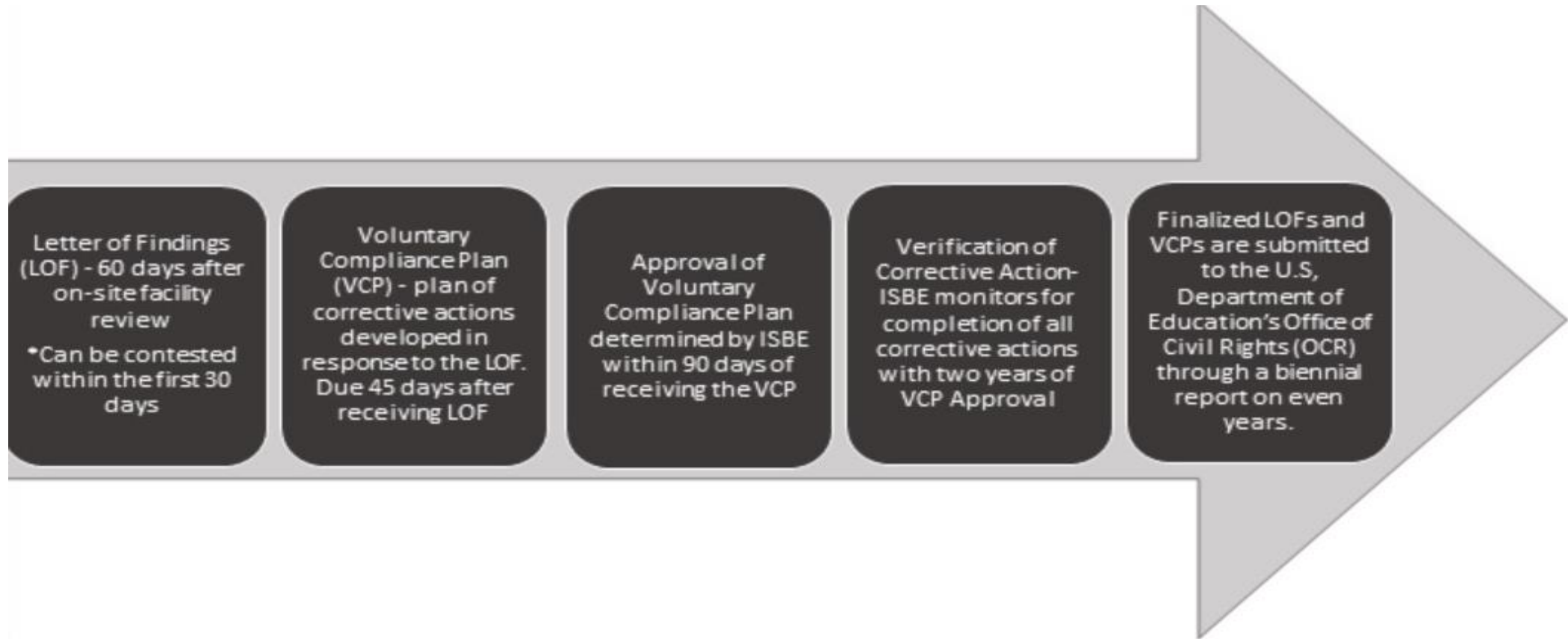
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Document Review (Process):

- Enrollment (**school-wide** and **CTE**)
- Student **race/ethnicity/sex/disability** demographics (**school-wide** and **CTE**)
- CTE **admission requirements** and **programming**
- **Website** information, **staff demographics**, **policy** and **procedure manual** (hard copy/links), including:
 - Staff and parents/students
 - Student/staff recruitment materials (including applications)
 - Work-based learning materials/applications

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Onsight Civil Rights Review Process



What happens after the on-site review?

I. Letter of Findings:

ISBE shall provide a draft Letter of Findings (LOF) to the school **district contact person/superintendent**. The LOF could include **findings and recommendations**. The LOF covers the following **Office of Civil Rights designated areas**:

- **Administrative Requirements**
- **Recruitment, Admissions, and Counseling**
- **Accessibility**
- **Comparable Facilities**
- **Services for Students with Disabilities**
- **Financial Assistance**
- **Work-study, Cooperative Programs, and Job Placement**
- **Employment**

School districts should **review** and **respond** to the **draft LOF** and **notify ISBE within 14 days if they wish to dispute a finding**. Once accepted, districts should develop a **Voluntary Compliance Plan (VCP)** using the **IWAS system**.

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What happens after the on-site review?

II. Voluntary Compliance Plan (VCP):

- Plans must be submitted to ISBE through IWAS **within 45 calendar days** and **must address each area of non-compliance detailed** in the **Letter of Finding(s)** to include the following:
 - 1. Area of non-compliance**
 - 2. Planned corrective action**
 - 3. Pace/Timeline to be completed to include, at the minimum, the month/year**
 - 4. Person responsible**
 - 5. The method of verification**
- **Districts must complete all corrective actions within two years** with the expectation that **some findings should be addressed in much less time**
- Upon receipt, **ISBE shall review the Voluntary Compliance Plan** and **either approve the plan fully or return the plan for additional information or changes.** Once approved, ISBE shall send an approval letter to the district.

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What happens after the on-site review?

III. Monitoring:

- Upon acceptance of the VCP, ISBE shall begin the monitoring process. School districts will submit verification evidence to ISBE for review through the IWAS system

IV. Letter of Closure:

- Upon receipt of the documentation that supports the successful completion of the entire VCP, a letter of closure of the civil rights review will be sent to the District Superintendent

Then What? Next Steps:

- **Every two years, ISBE must submit a biennial report to the Office of Civil Rights (OCR) detailing the status of the MOA process. This report includes all Letters of Finding and Voluntary Compliance Plans**

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Questions?

Please email us at moa@isbe.net or call (217) 524-4832 for any additional questions or clarification.

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