



**Oregon Department of Education | Office of Learning  
Community College Workforce and Development  
On-site Civil Rights Review**

# **Community College Self-Assessment Checklist**

The Office of Learning actively supports the mission of the Office for Civil Rights: *“To ensure equal access to a high quality education for all students through the vigorous enforcement of civil rights”*. A primary responsibility by the Office of Learning is the review of career & technical education programs for compliance with federal nondiscrimination regulations. The comprehensive Office of Learning review, typically called on-site reviews, permits the Office of Learning to prevent discrimination and ensure equal access to programs, courses and the information therein, for each Oregon student. The Office of Learning also provides technical assistance to help institutions achieve voluntary compliance with the civil rights laws that the Office for Civil Rights enforces.

## **Federal Compliance Requirements**

### U.S. Department of Education regulations implementing:

- Title VI of the Civil Rights Act of 1964 (Title VI), 34 CFR Part 100
- Title IX of the Education Amendments of 1972 (Title IX), 34 CFR Part 106
- Section 504 of the Rehabilitation Act of 1973 (Section 504), 34 CFR Part 104
- Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, and National Origin, Sex and Handicap (Guidelines), 34 CFR Part 100 Appendix B

### U.S. Department of Justice regulations implementing:

- Title II of the Americans with Disabilities Act of 1990 (Title II), 28 CFR Part 35 and subsequent Amendments

For information regarding Perkins Career & Technical Education civil rights visitation, contact:

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# Civil Rights On-Site Review Self-Assessment for Community Colleges

1. Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
<b>Civil Rights Assurance</b>		
<p>The community college has a statement of assurance (signed by the college CEO and/or Board Chair) for Title VI, Title IX and Section 504.</p> <p><u>Title VI of the Civil Rights Acts of 1964 [34 C.F.R., 100.4(a) thru (d)].</u>  <u>Title IX of the Education Amendments of 1972 [34 C.F.R., 106.4]</u> and  <u>Section 504 of the Rehabilitation Act of 1973 [34 C.F.R. 104.5]</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>A signed copy of assurance for Title VI of the Civil Rights Acts of 1964 [34 C.F.R., 100.4(a) thru (d)], Title IX of the Education Amendments of 1972 [34 C.F.R., 106.4] and Section 504 of the Rehabilitation Act of 1973 [34 C.F.R. 104.5] is on file in the institution.</p>	<ul style="list-style-type: none"> <li>▪ A copy of the signed Title VI, Title IX, Section 504 or a combined assurance document.</li> <li>▪ A copy of College Board minutes authorizing the assurance.</li> <li>▪ A copy of the application for federal Carl D. Perkins Career &amp; Technical Education funds. Signatures on application signify compliance.</li> </ul>
<b>Annual Public Notification</b>		
<p>Prior to the beginning of each school year, the college must advise students, parents, employees and general public that all career &amp; technical education opportunities will be offered regardless of race, color, national origin, sex or disability.</p> <p>The notice must include a brief summary of program offerings and admission criteria and the name, office address, and phone number of persons designated to coordinate compliance under Title IX &amp; Section 504.</p> <p>If a recipient'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 take steps to assure that the lack of English language skills will not be a barrier to admission and participation in Career &amp; Technical Education programs.</p> <p><u>Guidelines IV-O</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college issues annual public notice of nondiscrimination.</p> <p>The notice also is disseminated in the language of any national origin minority community in the service area.</p> <p>Annual notice lists coordinators of Section 504/ADA and Title IX with their name/title, address, and phone number.</p>	<ul style="list-style-type: none"> <li>▪ A notice in the local newspaper, college newspaper or other publication.</li> <li>▪ A copy of the notice describing program offerings and admission criteria.</li> <li>▪ A description of how the notice reaches: students, employees &amp; applicants.</li> <li>▪ A description of the method used to make this notice available to the visually impaired.</li> <li>▪ If there are national origin minority students with limited English skills in the community, a description of the method used to make this notice available to students and community members</li> </ul>

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1. Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
<b>Continuous Nondiscrimination Notice</b>		
<p>The college must take continuing steps to notify participants, beneficiaries, applicants, elementary and secondary school parents, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p> <p><i>Title IX; 34 CFR 106.9</i> <u>Section 504: 34 CFR 104.8</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>A variety of college publications notify applicants, students, employees and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> <li>▪ Brochures on programs, activities</li> <li>▪ Student application</li> <li>▪ Job application</li> <li>▪ Catalog</li> <li>▪ Student handbook</li> <li>▪ Job announcements</li> <li>▪ Posters advertising various programs</li> <li>▪ Recruitment materials</li> <li>▪ Website</li> <li>▪ School newspaper</li> </ul>
<b>Persons Responsible For Coordinating Title II, Title IX and Section 504</b>		
<p>Each college shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX.</p> <p>The recipient must notify students and employees of the name, office address, and phone number of the designated employee(s).</p> <p><u>Title II: 28 CFR 35.107 (a)</u> <u>Title IX: 34 CFR 106.8</u> <u>Section 504: 34 CFR 104.7(a)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college has assigned a person(s) to coordinate Section 504, Title II, and Title IX activities. This (these) person(s) must be aware of their duties and responsibilities and have the training necessary to carry out their responsibilities.</p> <p>The college lists coordinators of Section 504, Title II, and Title IX with their name/title, address, and phone number in the notice of nondiscrimination.</p>	<ul style="list-style-type: none"> <li>▪ Copies of information identifying the Title II, Title IX &amp; Section 504 Coordinators:</li> <li>▪ Catalogs</li> <li>▪ Handbooks</li> <li>▪ Job descriptions</li> <li>▪ Website</li> <li>▪ Interviews with Section 504, Title II, and Title IX coordinators</li> <li>▪ Interviews with students, particularly nontraditional and students with disabilities</li> <li>▪ Interviews with some faculty and administrators</li> </ul>
<b>Notice of Contact for Special Needs</b>		
<p>The college has and uses an approved statement notifying the public who they should contact for special accommodations, by title, phone and address.</p> <p><u>Title II/ADA Federal Code, Subpart E, Communications, 35.160 General (b) (1) (a)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college provides a public notice to interested parties regarding the existence and location of services, activities and location of facilities that are accessible to and usable by individuals with disabilities</p>	<ul style="list-style-type: none"> <li>▪ Public notification statement of who to contact for special needs, by name/title, address/phone number and advance notice deadline.</li> <li>▪ Copy of an event notice with the special needs statement.</li> </ul>

## Civil Rights On-Site Review Self-Assessment for Community Colleges

1. Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
<b>Grievance Procedure</b>		
<p>The college shall adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.  <u>Section 504: 34 CFR 104.7(b)</u>  <u>Title IX: 34 CFR 106.8(b)</u>  <u>Title II: 28 CFR 35.107(b)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b>  <b>reveal evidence of a violation</b></p>	<p>The college notifies students and employees that there is a grievance procedure for persons who feel they have been discriminated against based on sex or disability.</p> <p>The procedure is readily available to students and employees and it is prompt and equitable.</p>	<ul style="list-style-type: none"> <li>▪ A copy of the grievance procedure</li> <li>▪ Board minutes adopting the procedure</li> <li>▪ Student handbooks</li> <li>▪ Employee handbooks</li> <li>▪ Catalogs</li> <li>▪ Data on complaints</li> <li>▪ Interviews with faculty, students and administrators</li> <li>▪ Interviews with Section 504/ADA and Title IX coordinators</li> </ul>
<b>Distribution of Funds - OREGON</b>		
<p>The college may not adopt a formula or other method for the allocation of Federal, State, or local career &amp; technical education funds that has the effect of discriminating on the basis of race, color, national origin, sex or disability.  <u>Guidelines III, A-F,</u></p> <p><u>The Carl D. Perkins Career and Technical Education Act of 2006, Public Law 105-332</u>  <u>Title I—Voc &amp; Tech Ed. Assistance to the States</u></p> <p><i>Part B—State Provisions</i>  <u>Section 122 (c) (10)</u>  <u>Title III—General Provisions, Part A—Federal Administrative Provisions</u>  <u>Section 316—Fed. Laws Guaranteeing Civil Rights,</u></p> <p><u>Oregon State Plan for Vocational and Technical Education, February 2008</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b>  <b>reveal evidence of a violation</b></p>	<p>A description of how the college distributes federal career &amp; technical education funds.</p> <p>Description of any formulas/criteria and/or factors used in the fund distribution.</p> <p>Description of how use of these formulas/criteria and/or factors for fund distribution result in a process that is nondiscriminatory.</p>	<ul style="list-style-type: none"> <li>▪ Local Perkins plan</li> <li>▪ Criteria for local uses of Perkins career &amp; technical education plan that ensures nondiscrimination</li> <li>▪ Perkins Annual Report</li> </ul>

## Civil Rights On-Site Review Self-Assessment for Community Colleges

2. Admission		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Student Eligibility</b>		
<p>The college may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminate on the basis of race, color, national origin, sex or disability.</p> <p>Guidelines IV-A</p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Student eligibility criteria for admission to career &amp; technical education facilities or programs do not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> <li>▪ Eligibility and admission criteria for career &amp; technical education facilities or campuses.</li> <li>▪ Eligibility and admissions policy and criteria for career &amp; technical programs</li> <li>▪ Descriptions of the admissions process</li> <li>▪ Copy of career &amp; technical education schedule of courses</li> <li>▪ OCCURS data</li> <li>▪ College catalog</li> <li>▪ Course syllabi</li> </ul>
<b>Admission Issues</b>		
<p>The college may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.</p> <p>Guidelines IV-K</p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Demographics of career-technical enrollment are similar to demographics of eligible pool or recipient provides a legitimate non-discriminatory rationale.</p> <p>Demographics of specific CTE programs are similar to demographics of entire career-technical enrollment or recipient provides a legitimate nondiscriminatory rationale.</p> <p>Admissions procedure, policy, and/or practice for career and technical education program enrollment avoid criteria that disproportionately exclude persons of a particular race, color, national origin, sex, or disability status.</p> <p>Admissions criteria that disproportionately exclude have been validated as essential to participation.</p>	<ul style="list-style-type: none"> <li>▪ Admissions policy for career and technical education programs. Description of the admissions process</li> <li>▪ Procedures and criteria for selective admissions for career and technical education programs (where there are more applicants than can be accommodated).</li> <li>▪ Demographics of rejected applicants by selections criteria</li> <li>▪ Demographics of selected applicants by selection criteria</li> <li>▪ Copy of CTE schedule of classes</li> <li>▪ College catalog</li> <li>▪ Course syllabi</li> <li>▪ OCCURS data</li> </ul>

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<b>2. Admission</b>		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Preadmission Inquiries</b>		
<p>The college must avoid preadmission inquiries about marital, parental, or disability status.  <u>Title IX: 34 CFR 106.21(c)</u>  <u>Section 504: 34 CFR 104.42 (b)(4)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Application forms and materials do not request information about marital, parental, or disability status.</p>	<ul style="list-style-type: none"> <li>▪ Admissions application form and materials</li> </ul>
<b>Unlimited Occupational Opportunities for Disabled Persons</b>		
<p>The college must not deny access to CTE and academic programs or courses to students with a disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for non-disabled persons.  <u>Section 504: 34 CFR 104.10</u>  <u>Section 504: 34 CFR 104.43(c)</u>  <u>Guidelines IV-N</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college does not discourage students with disabilities from participating in programs due to potential workplace discrimination.</p>	<ul style="list-style-type: none"> <li>▪ Documentation of counseling</li> <li>▪ Counseling materials</li> <li>▪ Enrollment data</li> <li>▪ Number of students with disabilities by program</li> <li>▪ Placement/follow-up data</li> <li>▪ Interviews</li> </ul>
<b>Limited English Skills</b>		
<p>The college may not restrict admission to career &amp; technical education programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.  <u>Guidelines IV-L</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college has a procedure in place to identify and assess applicants with limited English proficiency.  --LEP enrollment in career &amp; technical education is proportional to LEP enrollment in the service area  --LEP enrollment in specific CTE programs is proportional to LEP enrollment in career &amp; technical education overall.</p>	<ul style="list-style-type: none"> <li>▪ Procedure for LEP identification and placement</li> <li>▪ Summary of steps taken to increase LEP participation in programs where they traditionally have been underrepresented</li> <li>▪ Specific program enrollment demographics by LEP status</li> </ul>

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2. Admission		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Impaired Sensory, Vocal or Speaking Skills</b>		
<p>Postsecondary admission tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).</p> <p><u>Section 504: 34 CFR 104.42(b)(3)</u> <u>Guidelines IV-N</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Admission tests and their manner of administration are validated for use with persons with impaired sensory, vocal or speaking skills.</p>	<ul style="list-style-type: none"> <li>▪ Lists of admissions tests used</li> <li>▪ Description of test administration methods for persons with sensory, vocal or speaking impairments</li> </ul>
<b>Preadmission Inquires re: Disabilities to Increase Participation</b>		
<p>Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.</p> <p><u>Section 504: 34 CFR 104.42(b)(4) &amp; (c)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>The college does not request information about disability prior to admission</p>	<ul style="list-style-type: none"> <li>▪ Student handbook</li> <li>▪ College catalog</li> <li>▪ Application forms</li> <li>▪ Guidance/counseling forms and procedures</li> <li>▪ Recruitment materials</li> <li>▪ Admissions packets</li> <li>▪ Interviews</li> </ul>

3. Recruitment		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Non-exclusive Recruitment</b>		
<p>Colleges must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.</p> <p><u>Title IX: 34 CFR 106.23 (a)(b)</u> <u>Guidelines V-C</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>All potential students have access to information. Efforts are made to reach underrepresented groups.</p>	<ul style="list-style-type: none"> <li>▪ Recruitment plans</li> <li>▪ List of recruitment activities and sites</li> <li>▪ Description of recruitment activities</li> <li>▪ Schedule of recruitment activities</li> <li>▪ Selection &amp; admissions criteria for career &amp; technical education programs/courses</li> </ul>
<b>Recruitment Materials</b>		
<p>Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disability.</p> <p><u>Guidelines V-C</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Descriptions of career opportunities are bias-free and free from stereotyping.</p>	<ul style="list-style-type: none"> <li>▪ Recruitment brochures and marketing materials-English &amp; non-English versions</li> <li>▪ Course syllabi or catalog</li> <li>▪ Policies/procedures for CTE programs/courses that address needs of Limited English Proficiency students.</li> </ul>

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<b>3. Recruitment</b>		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Recruiting Teams</b>		
<p>To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities. <u>Guidelines V-C</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Where possible, persons of differing races, genders, and disability are used for recruiting purposes. <i>(But a failure to do so should not be construed as noncompliance.)</i></p>	<ul style="list-style-type: none"> <li>▪ Staff demographics by program</li> <li>▪ Recruitment team demographics by program</li> </ul>
<b>A Community with Persons of limited English Proficiency</b>		
<p>If a college's service area contains a community with persons of limited English proficiency, information must be available to that community in its language. <u>Guidelines V-E</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Process is in place to identify and communicate with language minority communities. Efforts are made to communicate in a commonly understood language.</p>	<ul style="list-style-type: none"> <li>▪ Verification of limited English proficient community</li> <li>▪ Samples of materials in other languages</li> </ul>
<b>Promotional efforts and Materials</b>		
<p>Colleges may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration.  <u>Guidelines V-E</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Materials and/or media presentations show persons of varying races, male and female, persons with disabilities, and different national origins.</p>	<ul style="list-style-type: none"> <li>▪ Promotional materials, including:               <ul style="list-style-type: none"> <li>-- brochures,</li> <li>-- flyers,</li> <li>-- newspaper advertising,</li> <li>-- catalogs</li> </ul> </li> </ul>



## Civil Rights On-Site Review Self-Assessment for Community Colleges

4. Site Location		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Site Selection</b>		
<p>The college may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Colleges must locate career &amp; technical education facilities at sites that are readily accessible to both minority and non-minority communities and that do not tend to identify the facility or program as intended for minority or non-minority students.</p> <p><i>Guidelines IV-B</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Colleges must locate career &amp; technical education facilities at sites that are readily accessible to both minority and non-minority communities and that do not tend to identify the facility or program as intended for minority or non-minority students.</p> <p><i>Guidelines IV-B</i></p>	<ul style="list-style-type: none"> <li>▪ Maps showing location of career &amp; technical education facilities</li> <li>▪ Enrollment demographics of each facility</li> <li>▪ Demographics of communities surrounding the college</li> </ul>
<b>Site Modifications</b>		
<p>A college may not add to, modify, or renovate the physical plan of a career &amp; technical education facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex, or disability.</p> <p><i>Guidelines IV-D</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>After modification, the CTE site is readily accessible to minority and non-minority communities and the modification does not result in segregation.</p>	<ul style="list-style-type: none"> <li>▪ Maps showing location of modified career &amp; technical education program facilities</li> <li>▪ Student demographics before and after facility modifications</li> <li>▪ Demographics of communities surrounding the college.</li> </ul>
<b>Residency</b>		
<p>A college may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.</p> <p><i>Guidelines IV-C</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Attendance zones do not have the effect of excluding students on the basis of race, color, or national origin</p>	<ul style="list-style-type: none"> <li>▪ Maps of attendance zones</li> <li>▪ Demographics of contiguous service areas to the college</li> <li>▪ Curriculum offerings at contiguous facilities</li> <li>▪ Job placement rates at contiguous facilities</li> </ul>

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5. Services for Students with Disabilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>No Exclusion Based on Disability</b>		
<p>No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of disability. <u>Section 504: 34 CFR 104.4(a)</u> <u>Title II: 28 CFR 35.130(a)</u> <u>Guidelines IV-N</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college implements policies and procedures ensuring access for students with disabilities to programs, services, and activities</p>	<ul style="list-style-type: none"> <li>▪ Board policy</li> <li>▪ Student handbooks</li> <li>▪ Membership in clubs &amp; activities</li> <li>▪ Procedures for selection into clubs, activities, programs</li> <li>▪ Criteria for admission into courses, programs, services and activities</li> <li>▪ Public notification that all services, activities, and facilities are accessible for individuals with disabilities.</li> </ul>
<p>Students with disabilities must not be excluded from career &amp; technical education or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available. <u>Guidelines IV-N</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities.</p>	<ul style="list-style-type: none"> <li>▪ Examples of equipment adapted</li> <li>▪ Description of policy for providing aids and services</li> <li>▪ Description of aids and services available/provided/denied</li> <li>▪ List of materials/resources available for students with sensory impairments</li> <li>▪ Enrollment data by program</li> <li>▪ Number of students with disabilities denied admission</li> <li>▪ Student handbook, college catalog</li> <li>▪ Policies governing use of guide dogs, tape recorders, note takers</li> </ul>
<b>Academic Adjustments</b>		
<p>If academic requirements that are essential to the career and technical education program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete a degree program and/or licensure requirements <u>Section 504: 34 CFR 104.44 (a)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>List of academic adjustments available to disabled students who need such modifications in order to succeed in a career and technical education program. <u>Please note:</u> This list should also identify the providers of such services.</p>	<ul style="list-style-type: none"> <li>▪ Interviews with disabled student services coordinator and faculty and interviews with students with disabilities</li> <li>▪ Records or equipment schedules for the provision of auxiliary aids and services to individuals and students with disabilities</li> <li>▪ List of adaptive technologies and software used for student access to electronic information</li> <li>▪</li> </ul>

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5. Services for Students with Disabilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Adjusted Academic Requirements</b>		
Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability. <u>Section 504: 34 CFR 104.44(a)</u> <u>Title II: 28 CFR 35.130(b)(7)</u> <u>Guidelines IV-N</u>  <b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b>	The college adjusts academic requirements as appropriate to meet the needs of students with disabilities.	<ul style="list-style-type: none"> <li>▪ Number of students with disabilities in various courses and programs</li> <li>▪ List of CTE programs in which particular students with disabilities have been denied access</li> <li>▪ CTE programs in which essential requirements or licensing requirements have prevented access</li> <li>▪ List of modifications by program</li> <li>▪ Interviews</li> </ul>
<b>Course tests &amp; Evaluations</b>		
Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes or achievement levels or other relevant factors are measured and not the disability. <u>Section 504: 34 CFR 104.44(c)</u> <u>Title II: 28 CFR 35.130(b)(8)</u> <u>Guidelines IV-N</u>  <b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b>	The college accommodates needs of students with disabilities during testing.	<ul style="list-style-type: none"> <li>▪ Lists of modifications to tests or test administration</li> <li>▪ Location of testing; facility accessible, auditory/lighting adequate</li> <li>▪ Procedures for determining need</li> <li>▪ Interviews</li> </ul>
<b>Housing in Community Colleges</b>		
Students receive equitable opportunities to benefit from housing programs regardless of their sex, national origin, color, race, or disability. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.32</u> <u>Section 504: 34 CFR 104.45</u> <u>Guidelines VI-C</u>  <b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b>	The on-campus housing reflects the demographics of the general student population.  If an apparent disparity exists, the institution offers a legitimate, nondiscriminatory reason	<ul style="list-style-type: none"> <li>▪ Data of those living on campus</li> <li>▪ Interviews with students</li> <li>▪ Interviews with residence hall staff</li> </ul>

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<b>5. Services for Students with Disabilities</b>		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Comparable Housing</b>		
<p>The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to non-disabled students.</p> <p><u>Section 504: 34 CFR 104.45</u> <u>Guidelines VI-C</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The housing program meets 504 and Title II accessibility requirements.</p> <p>Students with disabilities have a full range of features and prices to choose from.</p>	<ul style="list-style-type: none"> <li>▪ Interviews with students</li> <li>▪ Disaggregated demographic study of who is living in the residence halls</li> <li>▪ Audit of features and prices</li> </ul>
<b>Off Campus Housing Does Not Discriminate</b>		
<p>If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their sex, race, color, national origin or disability.</p> <p><u>Title VI: 34 CFR</u> <u>Title IX: 34 CFR</u> <u>Section 504: 34 CFR</u> <u>Guidelines VI-C</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The institution has nondiscriminatory agreements in place with off-campus housing providers.</p> <p>The institution acts to resolve allegations of discrimination against off-campus housing providers operating under contract or similar arrangement.</p>	<ul style="list-style-type: none"> <li>▪ Data showing who is using the off campus housing service</li> <li>▪ Interviews with students</li> <li>▪ Review of contracts and agreements</li> </ul>
<p>The college does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.</p> <p><u>Title VI: 34 CFR</u> <u>Title IX: 34 CFR</u> <u>Section 504: 34 CFR</u> <u>Guidelines VI-C</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Written “contract” with landlords including notification of nondiscrimination.</p> <p>Timely investigation initiated and corrective action taken in response to any complaint.</p>	<ul style="list-style-type: none"> <li>▪ Review of the written contracts with landlords</li> <li>▪ Interviews with students</li> <li>▪ Interview with off campus housing staff</li> <li>▪ Interview with a sample of landlords</li> </ul>

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Section 504/ADA Accessibility Issues</b>		
<p>The college may not exclude students with disabilities from enjoying the benefits of its program or service because its facilities are inaccessible to or unusable by persons with disabilities.</p> <p><u>Existing facilities/Section 504 (34 CFR, 104.22)</u> <u>New construction/Section 504 (34 CFR 104.23)</u></p> <p><i>New construction/Section 504 (34 CFR 104.23)</i> <u>New construction/ ADA (28 CFR 35.151)</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Applicable accessibility standards are determined by the date the facility was constructed or last renovated by the institution.</p>	<ul style="list-style-type: none"> <li>▪ List of each facility reviewed with the date of construction or last renovation and the career &amp; technical education programs offered therein.               <ul style="list-style-type: none"> <li>--Building</li> <li>--Date</li> <li>--Programs</li> </ul> </li> <li>▪ Interviews with Agency CEO, Guidance Counselors, Department chairs, ADA and 504 Coordinators, Coordinator for Disabled Student Services, &amp; Facilities Director.</li> </ul>
<b>Existing (<i>Readily Accessible</i>) facility under Section 504 – Built or altered beginning June 3, 1977, or earlier</b>		
<p>The college shall operate its program or activity so that when each part is viewed in its entirety, it is readily accessible to disabled persons. 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.</p> <p><i>Section 504: 34 CFR 104.22</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p><b>--Readily Accessible</b></p> <p>--Redesign of equipment</p> <p>--Reassignment of classes or other services to accessible buildings</p> <p>--Assignment of aides to beneficiaries (but no carrying)</p> <p>--Home visits</p> <p>--Alteration of existing facilities and construction of new facilities in conformance with the requirements for new construction or any other methods that result in making its program or activity accessible to persons with disabilities</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>New construction under Section 504 – Built or altered between June 4, 1977, and January 17, 1991, inclusive</b>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the "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 A117.1-1961 (R1971) Later versions of ANSI A117.1 do not apply. <u>Section 504: 34 CFR 104.23</u> (prior to January 18, 1991 amendment)</p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p><b>ANSI</b></p> <p>4.1 Grading 4.2 Walks 4.3 Parking lots 5.1 Ramps and gradients 5.2 Entrances 5.3 Doors and doorways 5.4 Stairs 5.5 Floors 5.6 Toilet rooms 5.7 Water fountains 5.8 Public phones 5.9 Elevators 5.10 Controls 5.11 Identification 5.12 Warning signals 5.13 Hazards</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>
<b>New construction under Section 504 – Built or altered between January 18, 1991, and January 26, 1992, inclusive:</b>		
	<p><b><i>Uniform Federal Accessibility Standards (UFAS)</i></b> as applicable.</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>
<b>New construction under ADA Title II and Section 504 – Built after January 26, 1992; exercising the option to follow UFAS</b>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the Uniform Federal Accessibility Standards (UFAS) (Appendix A to 41 CFR subparts 101-19.6). Departures from particular technical and scoping requirements permitted where substantially equivalent or greater access to and usability of the building is provided. <u>Section 504: 34 CFR 104.23</u> <u>Title II: 28 CFR 35.151</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p><b><i>Uniform Federal Accessibility Standards (UFAS)</i></b> as applicable.</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<p><b>New construction under ADA Title II – Built after January 26, 1992 and before September 15, 2010; exercising the option to follow 1991 ADA Standards</b></p>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the 1991 ADA Standards for Accessible Design (1991 ADA Standards) (Appendix A to 28 CFR Part 36). Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. Subrecipients may also exercise the option to follow UFAS.) Title II: 28 CFR 35.151 (a), (b) &amp; (c) (1)</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p><b>1991 ADA Standards for Accessible Design (1991 ADA Standards)</b> as applicable.</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>
<p><b>New construction under ADA Title II – Built on or after September 15, 2010, and before March 15, 2012; exercising the option to follow the 2010 ADA Standards for Accessible Design.</b></p>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity is designed and constructed in such a manner that the facility is readily accessible to and usable by persons with disabilities. Conformance with the 2010 ADA Standards for Accessible Design (2010 ADA Standards) Available at: <a href="http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf">http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf</a>. Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. (Subrecipients may also exercise the option to follow UFAS or the 1991 ADA Standards. The elevator exemption contained at 1991 ADA Standards 4.1.3(5) and 4.1.6(1) (k) shall not apply.) Title II: 28 CFR 35.151(c)(2)</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>2010 ADA Standards for Accessible Design (<b>available at <a href="http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf">http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf</a></b>) as applicable</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>New construction under ADA Title II – Built on or after March 15, 2012; follow 2010 ADA Standards for Accessible Design.</b>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the 2010 ADA Standards for Accessible Design (2010 ADA Standards) Available at: <a href="http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf">http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf</a>. Title II: 28 CFR 35.151 (c)(3)</p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>2010 ADA Standards for Accessible Design (<b>available at</b> <a href="http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf">http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf</a>).</p>	<ul style="list-style-type: none"> <li>▪ Observations and measurements</li> <li>▪ Blueprints and plans</li> <li>▪ Renovation schedules</li> <li>▪ Maintenance records</li> <li>▪ Work orders or contracts indicating construction start dates</li> </ul>

7. Comparable Facilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Changing Rooms/Showers Comparable</b>		
<p>Changing rooms, showers, and other facilities for students of one sex are comparable to those provided to students of the other sex.</p> <p>Changing rooms, showers, and other facilities for students with disabilities are comparable to those provided to students without disabilities.</p> <p><i>Guidelines VI-D</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Locker rooms have approximately the same space and amenities for both males and females.</p> <p>If there is disparity, the institution provides a legitimate, nondiscriminatory rationale.</p> <p>Changing rooms, shower, bathrooms, and other facilities near the professional technical areas are comparable for both men and women.</p> <p>Persons with disabilities have convenient access to changing facilities and shower facilities.</p>	<ul style="list-style-type: none"> <li>▪ Visual examination of the facilities</li> <li>▪ Interviews students</li> <li>▪ Interviews with staff</li> </ul>



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8. Work Study, Cooperative Education and Job Placement		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Opportunities Available to All</b>		
<p>Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.  <u>Title VI: 34 CFR 100.3(b)</u>  <u>Title IX: 34 CFR 106.31(d)</u>  <u>Section 504: 34 CFR 104.4(b)</u>  <u>Section 504: 34 CFR 100.3 (c)</u>  <u>Section 504: 34 CFR 104.46 (b)</u></p> <p>Guidelines VII-A</p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Students in the work-study, cooperative education and job placement programs are representative of the demographics of the school or program.</p> <p>If there is disparity, the institution provides a legitimate, nondiscriminatory rationale.</p>	<ul style="list-style-type: none"> <li>▪ Review of enrollment data in the work-study, cooperative education, and job placement programs</li> <li>▪ Placement policies and criteria for placement</li> <li>▪ Employment notices</li> <li>▪ Interviews with students</li> <li>▪ Interviews with staff</li> </ul>
<b>Assurance of Employer Nondiscrimination</b>		
<p>A college that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and pay.  <u>Title VI: 34 CFR 100.3(b)</u>  <u>Title IX: 34 CFR 106.38</u>  <u>Section 504: 34 CFR 104.46(b)</u>  <u>Guidelines VII-A</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p><b>If written workplace agreements exist</b>, they must contain an assurance of nondiscrimination that is signed by both the employer and the agency.</p> <p>The college does not honor any employer's requests for students who are free of disabilities or for students of a particular race, color, national origin, or sex.</p>	<ul style="list-style-type: none"> <li>▪ Review of workplace assignments, hours of work, and job assignments</li> <li>▪ Interviews with students</li> <li>▪ Interviews with staff</li> <li>▪ Copies of written training agreements with employers that include statements of nondiscrimination and employer assurances.</li> <li>▪ Cooperative work experience placement policies and criteria for placement</li> </ul>

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9. Apprenticeship Training		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Agreement with Non-discriminating Labor Union or Apprenticeship Sponsor</b>		
<p>Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability.</p> <p><i>Title VI: 34 CFR 100.3(c)</i>  <i>Title IX: 34 CFR 106.31(d)</i>  <i>Section 504: 34 CFR 104.11(a)(4)</i>  <i>Guidelines VII-B</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Verification that staff understands this requirement.</p> <p>Verification that the staff has not honored any request.</p>	<ul style="list-style-type: none"> <li>▪ Policy or written procedure</li> <li>▪ Interview with students</li> <li>▪ Interview with staff</li> <li>▪ Interview with sponsors of apprenticeship programs</li> <li>▪ Copy of information used to promote apprenticeship programs</li> </ul>
<b>Written Agreement with the Labor Union or Apprenticeship Sponsor</b>		
<p>A written agreement between the college and the labor union or other sponsor includes an assurance of nondiscrimination on the basis of race, color, national origin, sex, or disability.</p> <p><i>Guidelines VII-B</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p><b>If there are written agreements between apprenticeship programs and the agency</b>, they must contain the college nondiscrimination statement that is signed by both parties.</p>	<ul style="list-style-type: none"> <li>▪ Copy of labor unions' or sponsors' statement of nondiscrimination.</li> </ul>

10. Guidance and Counseling		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Counseling Materials and Activities   Do Not Discriminate</b>		
<p>Colleges must ensure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.</p> <p><i>Title IX: 34 CFR 106.36</i>  <i>Section 504: 34 CFR 104.47 (b)</i></p> <p><i>Guidelines V-A</i></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The written guidance plan, policy, and procedures ensure nondiscrimination.</p> <p>The written assessment plan ensures nondiscrimination.</p>	<ul style="list-style-type: none"> <li>▪ A copy of the written college guidance and counseling policy, plan and procedure.</li> <li>▪ A list of test administered for selecting students for placement in career &amp; technical education programs/courses.</li> <li>▪ Written procedures for evaluation and placement of students with disabilities</li> <li>▪ List of tests and interest inventories administered.</li> <li>▪ Promotional and recruitment materials</li> </ul>

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<b>10. Guidance and Counseling</b>		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Career &amp; Technical Education Programs Open to All Students</b>		
<p>Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Colleges must ensure that counselors do not direct or urge 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.</p> <p><u>Title IX: 34 CFR 106.36</u> <u>Section 504: 34 CFR 104.47(b)</u> <u>Guidelines V-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Career &amp; technical education program enrollments by sex, race, national origin, and disability are proportionate to enrollment of these groups in the general student population.</p> <p>Where enrollments are not proportionate, the institution can furnish a legitimate, nondiscriminatory rationale.</p>	<ul style="list-style-type: none"> <li>▪ OCCURS data. (Enrollment demographics by class/program)</li> <li>▪ Admission criteria</li> <li>▪ Enrollment forms.</li> <li>▪ Description of counseling services for students with limited English language skills and disabilities.</li> <li>▪ Copies of promotional materials used with limited English language students</li> </ul>
<b>Nonrestrictive Career Objectives for Students with Disabilities</b>		
<p>Colleges may not counsel disabled students toward more restrictive career objectives than non-disabled students with similar abilities and interests.</p> <p><u>Section 504: 34 CFR 104.47(b)</u> <u>Guidelines V-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Disabled students have equal access to all programs and classes based on abilities and interests.</p>	<ul style="list-style-type: none"> <li>▪ Examples of pre-enrollment counseling</li> <li>▪ Enrollment data</li> </ul>
<b>Counseling of Students with Limited English Proficiency or Hearing Impairments</b>		
<p>Colleges must ensure that counselors can effectively communicate with students with limited English proficiency and with students with sensory impairments.</p> <p><u>Guidelines V-D</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The content of materials available to other students and their parents is available to students and parents who speak languages other than English.</p> <p>Formats other than the printed word are available for students with disabilities.</p>	<ul style="list-style-type: none"> <li>▪ Written plan for the provision of services for LEP individuals</li> <li>▪ Written plan for provision of services for individuals with hearing impairments</li> <li>▪ Samples of materials in other languages/formats</li> </ul>

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10. Guidance and Counseling		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Disproportional Enrollment</b>		
<p>If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Colleges must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.  <u>Title IX: 34 CFR 106.36</u>  <u>Guidelines V-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>The college has a process in place to identify disproportionate enrollment. When disproportionate enrollment occurs, the college assesses counseling materials and activities and makes appropriate revisions or can articulate a legitimate, nondiscriminatory rationale.</p>	<ul style="list-style-type: none"> <li>▪ Description of any efforts made to correct disproportionate program enrollment by gender, minority or disabled status.</li> <li>▪ Examples of pre-enrollment counseling</li> <li>▪ Enrollment data</li> <li>▪ Examples of revised counseling materials or activities in response to disproportionate enrollments</li> </ul>

11. Financial Assistance		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Financial Assistance Available to All Students</b>		
<p>Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.  <u>Title VI: 34 CFR 100.3(b)</u>  <u>Title IX: 34 CFR 106.37</u>  <u>Section 504: 34 CFR 104.46(a)</u>  <u>Guidelines VI-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Institutional data on financial aid demonstrates that there is equitable distribution of financial aid regardless of sex, race, color, national origin, or disability.</p> <p>If an apparent disparity exists, the institution offers a legitimate, nondiscriminatory reason.</p>	<ul style="list-style-type: none"> <li>▪ Financial aid data by sex, race, color, national origin, or disability</li> <li>▪ Interviews with students</li> <li>▪ Interviews with financial aid staff</li> <li>▪ Interviews with counselors</li> <li>▪ Award criteria for financial aid</li> </ul>
<b>Sex-Restricted Awards</b>		
<p>Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, color, national origin or disability.  <u>Title IX: 34 CFR 106.37</u>  <u>Guidelines VI-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/> reveal evidence of a violation</b></p>	<p>Documentation is available as to the number and amount of aid given as a result of will, trust, bequest, or other legal instrument.</p> <p>Overall, the institution's financial assistance does not discriminate on the basis of sex.</p>	<ul style="list-style-type: none"> <li>▪ Documentation of all sex-restricted financial aid given</li> <li>▪ Total list of financial aid to ensure the overall effect does not discriminate</li> </ul>

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11. Financial Assistance		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Financial Aid Information Written Equitably</b>		
<p>Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis. <u>Guidelines VI-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>All written materials provide information equitably and contain the non-discrimination statement.</p> <p>Institutional awards provided as a result of the group being historically underrepresented or as a result of a bequest, trust, or other legal instrument is acknowledged as such in the written materials.</p>	<ul style="list-style-type: none"> <li>▪ Copy of materials written for students and families concerning the financial assistance available</li> <li>▪ List of scholarships or financial awards offered by outside organizations or individuals and their award criteria</li> <li>▪ Documentation of all financial assistance given as a result of trust, bequest, or other legal instrument</li> <li>▪ Copies of materials for students with sensory impairments.</li> </ul>
<b>Aid Information In Other Languages</b>		
<p>National origin minority persons with limited English language skills receive information about financial assistance in their own language. <u>Guidelines VI-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Community demographics indicate that national origin minority persons with limited English language skills are a part of the population served by the college.</p> <p>Financial assistance information is available in the home language of these community members.</p>	<ul style="list-style-type: none"> <li>▪ Copies of financial assistance materials in native language.</li> <li>▪ Demographics of the area served by the college</li> <li>▪ Interviews with students and bilingual interpreters</li> </ul>

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<b>12. Employment</b>		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Pre-employment &amp; Employment Practices</b>		
<p>Colleges may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or disability. Colleges may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion, or other discrimination against students.</p> <p>Colleges may not make pre-employment inquiries concerning disability, marital, or parental status.  <u>Title IX: 34 CFR 106.60</u>  <u>Section 504: 34 CFR 104.14</u>  <u>Guidelines VIII-A</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b>  <b>reveal evidence of a violation</b></p>	<p>The college's employment practices are conducted without regard to race, color, national origin, sex, or disability of applicants or employees.</p> <p>Application forms and materials are free from prohibited questions concerning disability or marital or parental status.</p>	<ul style="list-style-type: none"> <li>▪ Copies of employment practices documents including:               <ul style="list-style-type: none"> <li>--hiring policies &amp; procedures</li> <li>--advancement policies and procedures</li> <li>--employee handbooks</li> <li>--application materials and forms</li> <li>--screening committee policies and procedures</li> <li>--rating systems</li> <li>--job announcements</li> <li>--recruitment policies</li> </ul> </li> <li>▪ Copy of affirmative action or equal employment opportunity plan adopted by the board, if they exist, must be consistent with federal law.</li> </ul>
<b>Notice to Faculty of Nondiscrimination</b>		
<p>The college must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.  <u>Guidelines VIII-B</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b>  <b>reveal evidence of a violation</b></p>	<p>The college notifies its sources of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> <li>▪ Copy of an employment application form</li> <li>▪ Job/position descriptions.</li> <li>▪ Copy of published job vacancy announcements and advertisements.</li> <li>▪ Recruitment letters or contacts</li> <li>▪ Personnel website and other related recruitment documents</li> <li>▪ Published nondiscrimination statement in newspapers, student handbooks, &amp; other college materials</li> </ul>

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**12. Employment**

Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<b>Faculty Salary Scales Do Not Discriminate</b>		
<p>The college should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.  <u>Title IX: 34 CFR 106.54</u>  <u>Section 504: 34 CFR 104.11 and 12</u>  <u>Guidelines VIII-D</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>Faculty salary scales and policy are based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.</p> <p>Faculty assignment patterns are non-discriminatory on the basis of race, color, national origin, sex, or disability.</p> <p>Non-faculty salary administration is based upon the conditions of employment without regard to race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> <li>▪ College salary schedule(s)</li> <li>▪ Faculty assignment information by race/ethnic group, sex, and staff with disabilities</li> <li>▪ Non-faculty classification/compensation system is in place that evaluates jobs and places them in appropriate salary ranges according to working conditions and levels of employment responsibility</li> </ul>
<b>Equal Employment Opportunities for Applicants with Disabilities</b>		
<p>Colleges must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitations of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship.  <u>Section 504: 34 CFR 104.12</u>  <u>Guidelines VIII-E</u></p> <p style="text-align: center;"><b>Investigation Does <input type="checkbox"/>   Does Not <input type="checkbox"/></b> <b>reveal evidence of a violation</b></p>	<p>The college's employment policies do not unlawfully discriminate against the disabled.</p> <p>Disabled persons are employed in teaching and administrative positions and are not treated differently in promotion and tenure decisions.</p>	<ul style="list-style-type: none"> <li>▪ Number of staff with disabilities</li> <li>▪ Copies/descriptions of policies, procedures, and criteria considered for hiring, promotion, retention, and tenure including professional and non-professional applications</li> </ul>