

# Methods of Administration (MOA) On-Site Compliance Review Postsecondary Compliance Checklist

Checklist of required documentation to submit when postsecondary institutions  
are notified of an On-Site Review

June 2025

## **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 (ADA), 28 CFR Part 35

## **Contacts:**

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## On-Site Review Instructions

For postsecondary institutions, the on-site review requires advance preparation before the site visit, including preparing documentation, identifying and scheduling administrators, staff, and students for on-site interviews, and scheduling staff to provide on-site tours.

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### Required Documentation

THECB requires several different types of materials for the on-site review. The institution will collect most of these materials during the compliance review process. Requested documents, records, and other materials must be compiled in their entirety and submitted to the MOA Coordinator electronically at least thirty (30) days prior to the on-site visit. THECB will review all materials provided by the institution prior to the on-site visit.

### **Required materials should include:**

1. This document's Compliance Review Postsecondary Self-Assessment Checklist
  - a. Completed self-assessment checklist, including supporting documentation.
  - b. Submit documentation using the [MOA Information Request Form](#)
2. Documentation confirming the hiring of a vendor for a facilities audit.

### Uploading Documents for Review

1. Select the topic for which the documentation is submitted (submit each topic separately). (For example: select Topic # 1, attach documents, and press submit. Then, in separate submissions, repeat for Topics # 2, 3, 4.)
2. Drag and drop one or more files or click on the "browse files" link to upload files from your computer to the indicated box (maximum of 5 documents per submission).
3. Select to cc to yourself as desired; and press submit.
4. **If Personally Identifiable Information (PII) is present in anything you must send, please ensure that it is properly redacted prior to submission to protect the privacy of the students and staff.**

**The link for each submission will be the same and the process will be duplicated for each evidence type submission. Please only provide 1-5 examples of documentation required for each of the question upload.**

### **Attention:**

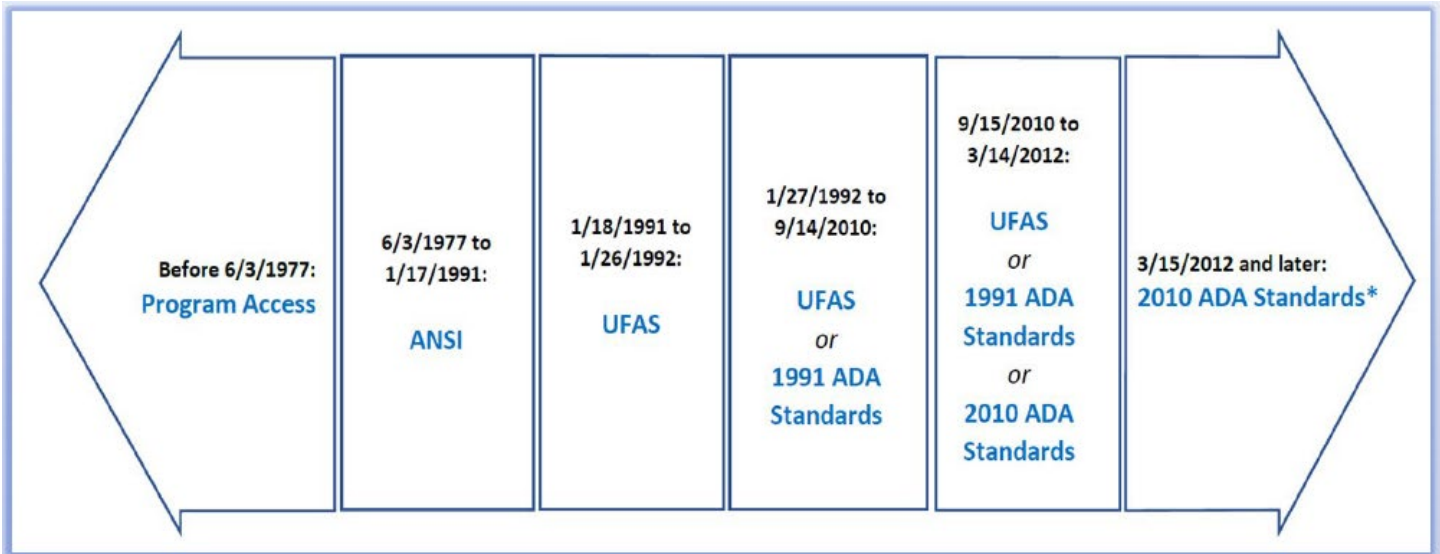
**Label the document as follows: MOA Documentation Submission\_Institution Name\_Topic #.**

*Example: MOA Documentation\_Alamo CC\_A1*

FACILITIES- Facilities Audit Required (Timeline will be negotiated between THECB and Institution)			
	<p><b>Please read:</b> The goal of this facility audit is to make sure your institution’s facilities meet ADA requirements for students. Institutions must hire an external vendor to complete the facilities audit. Institutions may use Perkins funds for this task. Institutions must submit a budget amendment to their Perkins Basic Grant under Schedule D to use the allocated money for the current grant year. <b>Confirmation of hiring a vendor for the facilities audit must be submitted with materials BEFORE the THECB On-Site Visit. As a guide, the facility audit will only deal with buildings and parking lots students use to graduate. For example, if an administration building has no classrooms or student services and is not for student use, then it does not need to be a part of the audit. THECB will work with institutions on timelines for completion of the facilities audit. Below are required submissions for the facility audit:</b></p>		
9.	<p><b>Campus map</b>  <b>a.</b> A map of the entire campus  <b>b.</b> Copies of layout plans for 1) site property limits and 2) building locations. The documents provided should include a scale, preferably 1”= 50’ on a sheet size of 24”x36”. You may provide as many separate sheets as necessary.</p>	<p>a. <input type="checkbox"/>  b. <input type="checkbox"/></p>	<p><input type="checkbox"/>  <input type="checkbox"/></p>
10.	<p><b>Parking</b>  <b>a.</b> Provide layout plans for all parking lots. The plans include location of accessible spaces, all drop-off locations, and, if available, the grading at accessible spaces.  <b>b.</b> Provide a parking lot matrix that has a separate count for all parking space types. See <b>Attachment A</b>.  <b>c.</b> Provide parking lot construction and alteration information. To do so, complete <b>Attachment B</b>.</p>	<p>a. <input type="checkbox"/>  b. <input type="checkbox"/>  c. <input type="checkbox"/></p>	<p><input type="checkbox"/>  <input type="checkbox"/>  <input type="checkbox"/></p>
11.	<p><b>Room Schedule</b>  Provide a room schedule for all buildings used by CTE students. Please see <b>Attachment C</b> for instructions and an example.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
12.	<p><b>Areas of Refuge</b>  Locations in any and all Areas of Refuge. Please include all pertinent information (i.e. building, room number, stair location, etc.).</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
13.	<p><b>Emergency Power and Systems</b>  See <b>Attachment D</b> for instructions and a sample format.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
14.	<p><b>Emergency Plan</b>  A copy of the campus emergency plan in the event of a <b>tornado</b>. The plan should include information on assisting students with disabilities.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
15.	<p><b>Elevators</b>  Provide a schedule of all elevators. Include a copy of current state inspection certificates. Indicate the landings they respond to in an emergency call situation. See <b>Attachment E</b> for instructions and a sample schedule.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
16.	<p><b>Events and seating</b>  <b>a.</b> Provide information for event spaces/special rooms that include total seating capacity, as well as a count for accessible and companion seating. <i>Examples may include the following: conference centers, multi-purpose rooms, gymnasium, and theaters/auditoriums.</i></p>	<p>a. <input type="checkbox"/>  b. <input type="checkbox"/></p>	<p><input type="checkbox"/>  <input type="checkbox"/></p>

17.	<p><b>CTE Campus Buildings</b>          Complete <b>Attachments F</b> and <b>Attachment G</b> regarding campus building construction and alteration information. Please use the arrow diagram below as a reference tool.  <b>Note:</b> <i>It is important to complete these attachments as accurately as possible. The major portion of the facilities review will follow the chronology of the information you provide.</i></p>	□	□
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### Application Standards by Date



\*An institution may choose to use UFAS or the 2010 ADA Standards to meet its Section 504 obligation, which is the focus of compliance reviews

- Post-March 15, 2012, new constructions or renovations must meet the 2010 ADA Standards.
- Pre-March 15, 2012, existing facilities should comply with the standards in place at the time of construction or renovation, unless they are undergoing modifications, which then require compliance with the 2010 Standards.
- Facilities must be brought up to current standards if non-compliance is identified.

### Attachment A: Parking lot matrix

Identify the number of parking spaces per type in each lot. Please signify how many of the accessible spaces in a lot are van accessible. The OTHER field should identify spaces that are not the first four types. Examples of these can include emergency vehicles, public/visitor parking, bus parking, and facilities/equipment. Edit lines as needed.

PARKING LOT MATRIX						
LOT	Student	Staff	Accessible	Motorcycle	Other	
					Description	#
A						
B						
C						
D						
E						
F						
<b>Total</b>						

### Attachment B: Parking lot construction/alteration dates

Parking Area	Date of Construction	Last Date of Resurfacing	Last Date for Signage Replacement
Lot A			
Lot B			
Lot C			
Lot D			
Lot E			
Lot F			



## Attachment D: Emergency Systems

Emergency Power and Systems			
Building:	Yes	No	Battery-powered?
Does this building have an emergency power source? <i>If yes, please indicate the source:</i>			
Does this building have fire suppression?			
If yes, is it connected to emergency power?			
If any onsite emergency power is available, is the entire site gear emergency supplied?			
Does the building have any of the following components?			
Fire alarms			
Egress lighting			
Exit signs			
Accessible doors			
Area of rescue assistance			
Emergency systems			
Outside buildings and/or parking lot lights			

## Attachment E: Elevators

Provide schedule of all elevators. Include a copy of all current state inspection certificates and match to schedule provided. Indicate the landings they respond to in case of an emergency (ICE). Add row/columns as necessary.

*Example*

Building: A					
Elevator	Current Inspection Date	Emergency power?	Floor Recall Ex.	Date of installation	Any updates?
1	01-01-17	Yes	2	05-16-85	Yes
2	06-27-15	No	3	07-18-89	No
Update description:					
ICE landing:					

Building:					
Elevator	Current Inspection Date	Emergency power?	Floor Recall Ex.	Date of installation	Any updates?

Update description:

ICE landing:

Building:					
Elevator	Current Inspection Date	Emergency power?	Floor Recall Ex.	Date of installation	Any updates?

Update description:

ICE landing:

Building:					
Elevator	Current Inspection Date	Emergency power?	Floor Recall Ex.	Date of installation	Any updates?

Update description:

ICE landing:





## Postsecondary Compliance Self-Assessment Checklist (Required)

Section 1 Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Example Documentation
<b>1.1 Continuous Nondiscrimination Notice</b>		
<p>A college must take continuing steps to notify participants, beneficiaries, applicants, parents, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the college that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p> <p><u>Title IX: 34 CFR 106.9</u> <u>Section 504: 34 CFR 104.8</u></p>	<p>A variety of college publications notifies applicants, students, employees and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p> <p><i>Please provide a minimum of three examples of nondiscrimination notices.</i></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>• Newspapers (school newspaper as well as ads in community newspaper)</li> </ul>
<b>1.2 Persons Responsible for Coordinating 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 college 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>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>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>• 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>• Interview students, particularly nontraditional and disabled</li> <li>• Interview some faculty and administrators</li> </ul>

<b>1.3 Annual Public Notification</b>		
<p>Prior to the beginning of each school year, colleges must advise students, parents, employees and general public that all vocational 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 and Section 504.  <u>Title IX: 34 CFR 106.8(b)</u>  <u>Section 504: 34 CFR 104.7(a)</u>  <u>Title II: 28 CFR 35.107(a)</u>  <u>Guidelines IV-O</u></p>	<p>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 a 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, and 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 them</li> </ul>
<b>1.4 Grievance Procedure</b>		
<p>A 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>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>• 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>Section 2 Recruitment</b>		
<b>Equity Requirement/ Legal Citation</b>	<b>Indicators of Compliance</b>	<b>Example Documentation</b>
<b>2.1 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.  <u>Title IX: 34 CFR 106.23 (a)(b)</u>  <u>Guidelines V-C</u></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> </ul>
<b>2.2 Recruitment Materials</b>		

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disability. <u>Guidelines V-C</u>	Descriptions of career opportunities are bias-free and free from stereotyping.	<ul style="list-style-type: none"> <li>• Recruitment brochures and marketing materials</li> <li>• Course catalog</li> </ul>
<b>2.3 Recruiting Teams</b>		
To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities. <u>Guidelines V-C</u>	Where possible, persons of differing races, genders, and disability are used for recruiting purposes.  (But a failure to do so should not be construed as noncompliance.)	<ul style="list-style-type: none"> <li>• Staff demographics by program</li> <li>• Recruitment team demographics by program</li> </ul>
<b>2.4 Promotional Efforts and Materials</b>		
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>	Materials and/or media presentations show persons of varying races, male and female, persons with disabilities, and different national origins.	<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>
<b>2.5 Community with Persons of Limited English Proficiency</b>		
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>	The process is in place to identify and communicate with language minority communities. Efforts are made to communicate in a commonly understood language.	<ul style="list-style-type: none"> <li>• Verification of limited English proficient community</li> <li>• Samples of materials in other languages</li> </ul>

Section 3 Admissions		
Equity Requirement/ Legal Citation	Indicators of Compliance	Example Documentation
<b>3.1 Student Eligibility</b>		
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. <u>Guidelines IV-A</u>	Student eligibility criteria for admission to Career & Technical Education schools, facilities or programs do not discriminate on the basis of race, color, national origin, sex, or disability.	<ul style="list-style-type: none"> <li>• Eligibility and admission criteria for Career &amp; Technical Education Schools</li> <li>• Eligibility and admission criteria for Career &amp; Technical Education facilities, campuses</li> <li>• Eligibility and admission criteria for Career &amp; Technical Education programs</li> </ul>
<b>3.2 Admission Issues</b>		
A 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. <u>Guidelines IV-K</u>	<p>Demographics of career-technical enrollment are similar to demographics of eligible pool or college provides a legitimate nondiscriminatory rationale.</p> <p>Demographics of specific Career &amp; Technical Education programs are similar to demographics of entire career-technical enrollment or college 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 programs (where there are more applicants than can be accommodated)</li> <li>• Demographics of rejected applicants by selection criteria</li> <li>• Demographics of selected applicants by selection criteria</li> </ul>
<b>3.3 Preadmission Inquiries</b>		
Colleges must avoid preadmission inquiries about marital, parental, or disability status. <u>Title IX: 34 CFR 106.21(c) Section 504: 34 CFR 104.42 (b)(4)</u> <u>Title II: 28 CFR 35</u>	Application forms and materials do not request information about marital, parental, or disability status.	<ul style="list-style-type: none"> <li>• Admissions application form and materials</li> </ul>
<b>3.4 Unlimited Occupational Opportunities for Disabled Persons</b>		

<p>A college must not deny access to vocational 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 nondisabled 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>The agency 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 disabled students by program</li> <li>• Placement/follow-up data</li> </ul>
<p><b>3.5 Limited English Skills</b></p>		
<p>A college may not restrict admission to vocational 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>College has a procedure in place to identify and assess applicants with limited English proficiency.</p> <p>LEP enrollment in vocational education is proportional to LEP enrollment in the service area</p> <p>LEP enrollment in specific vocational programs is proportional to LEP enrollment in vocational 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>
<p><b>3.6 Impaired Sensory, Vocal, or Speaking Skills</b></p>		
<p><b>Postsecondary</b> 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).  <u>Section 504: 34 CFR 104.44(b)(3)</u>  <u>Guidelines IV-N</u></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 tests used</li> <li>• Description of test administration methods for persons with sensory, vocal, or speaking impairments</li> </ul>
<p><b>3.7 Preadmission Inquiries Regarding Disabling Conditions</b></p>		
<p><b>Postsecondary</b> institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.  <u>Section 504: 34 CFR 104.42(b)(4) &amp; (c)</u></p>	<p>The college does not request information about disability prior to admission.</p>	<ul style="list-style-type: none"> <li>• Student handbook/college catalog</li> <li>• Application forms</li> <li>• Guidance/counseling forms and procedures</li> <li>• Recruitment materials</li> <li>• Admissions packets</li> </ul>
<p><b>Section 4 Student Financial Assistance</b></p>		
<p><b>Equity Requirement/ Legal Citation</b></p>	<p><b>Indicators of Compliance</b></p>	<p><b>Example Documentation</b></p>

<b>4.1 Financial Assistance Available to All Students</b>		
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>	Institutional data on financial aid demonstrates that there is equitable distribution of financial aid regardless of sex, race, color, national origin, or disability. If an apparent disparity exists, the institution offers a legitimate, nondiscriminatory reason.	<ul style="list-style-type: none"> <li>Financial aid data by sex, race, color, national origin, or disability</li> </ul>
<b>4.2 Sex-Restricted Awards</b>		
Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex. <u>Title IX: 34 CFR 106.37</u> <u>Guidelines VI-B</u>	Documentation is available as to the number and amount of aid given as a result of will, trust, bequest, or other legal instrument.  Overall, the institution's financial assistance does not discriminate on the basis of sex.	<ul style="list-style-type: none"> <li>Review of all financial assistance given as a result of trust, bequest, or other legal instrument</li> <li>Review of all sex-restricted financial aid given</li> <li>Review total list of financial aid to ensure the overall effect does not discriminate</li> </ul>
<b>4.3 Financial Aid Information Written Equitably</b>		
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>	Materials written provide information equitably.  All written materials contain the nondiscrimination statement.  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.	<ul style="list-style-type: none"> <li>Review materials written for students and families concerning the financial assistance available</li> </ul>
<b>4.4 Aid Information in Other Languages</b>		
National origin minority persons with limited English language skills receive information about financial assistance in their own language. <u>Guidelines VI-B</u>	Community demographics indicate that national origin minority persons with limited English language skills are a part of the population served by the college.  Communications about financial assistance is available in the home language of these members of the community.	<ul style="list-style-type: none"> <li>Review written communications</li> <li>Review demographics of the area served by the college</li> </ul>

<b>Section 5      Advising and Counseling</b>		
<b>Equity Requirement/ Legal Citation</b>	<b>Indicators of Compliance</b>	<b>Example Documentation</b>
<b>5.1 Counseling Materials and Activities</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><u>Title IX: 34 CFR 106.21 (a)(b)</u>  <u>Title IX: 34 CFR 106.36 (a)</u>  <u>Title IX: 34 CFR 106.34</u>  <u>Section 504: 34 CFR 104.4 (a), and 104.34 (a) and (c)</u>  <u>Section 504: 34 CFR 104.47 (b)</u>  <u>Title II: 28 CFR 35.130</u>  <u>Guidelines V-A</u></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>• Advising plan, policy, and procedure</li> <li>• Assessment plan with a list of tests administered (if applicable)</li> <li>• Written procedures for evaluation and placement of disabled students</li> <li>• Promotional and recruitment materials</li> <li>• Enrollment demographics</li> <li>• Recruitment, admission policies</li> </ul>
<p><b>5.2 Career &amp; Technical Education Programs Open to All Students</b></p>		
<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 106.34</u>  <u>Section 504: 34 CFR 104.47(b)</u>  <u>Guidelines V-B</u></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>• Admission criteria</li> <li>• Enrollment forms</li> <li>• Enrollment demographics by class/program</li> </ul>
<p><b>5.3 Nonrestrictive Career Objectives for Students with Disabilities</b></p>		
<p>Colleges may not counsel disabled students toward more restrictive career objectives than nondisabled students with similar abilities and interests.</p> <p><u>Section 504: 34 CFR 104.37(b)</u>  <u>Guidelines V-B</u></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>
<p><b>5.4 Counseling of Students with Limited English Proficiency or Sensory Impairments</b></p>		
<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>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 ESL individuals</li> <li>• Written plan for provision of services for hearing impaired individuals</li> <li>• Samples of materials in other languages/formats</li> </ul>
<p><b>5.5 Disproportionate Enrollment</b></p>		

<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 Guidelines V-B</u></p>	<p>College has process in place to identify disproportionate enrollment. When disproportionate enrollment occurs, 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>• 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>
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<b>Section 6 Services for Students with Disabilities</b>		
<b>Equity Requirement/ Legal Citation</b>	<b>Indicators of Compliance</b>	<b>Example Documentation</b>
<b>6.1 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>The agency implements policies and procedures ensuring access for students with disabilities to programs, services, and activities.</p>	<ul style="list-style-type: none"> <li>• Institutional Policy</li> <li>• Student handbooks</li> <li>• Membership lists in clubs and activities</li> <li>• Procedures for selection into clubs, activities, programs</li> <li>• Criteria for admission into courses, programs, services, and activities</li> </ul>
<p>Students with disabilities must not be excluded from vocational, career, or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available. <u>Guidelines IV-N</u></p>	<p>The agency 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>• Example(s) 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 seeing or hearing impaired</li> <li>• Enrollment data by program</li> <li>• Number of disabled students denied admission</li> <li>• Student handbook/college catalog</li> <li>• Policies governing use of guide dogs, tape recorders, note takers</li> </ul>
<b>6.2 Academic Adjustments</b>		

<p>If academic requirements that are essential to the career and technical 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>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>• services coordinator and faculty</li> <li>• Records or equipment schedules for the provision of auxiliary aids and services to individuals students with disabilities.</li> </ul>
<p><b>6.3 Adjusted Academic Requirements</b></p>		
<p>Postsecondary colleges 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></p>	<p>The agency adjusts academic requirements as appropriate to meet the needs of students with disabilities.</p>	<ul style="list-style-type: none"> <li>• Number of disabled students in various courses and programs</li> <li>• List of programs in which particular disabled students have been denied access.</li> <li>• Programs in which essential requirements or licensing requirements have prevented access.</li> <li>• List of modifications by program</li> </ul>
<p><b>6.4 Course Examinations &amp; Evaluations</b></p>		
<p>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></p>	<p>The agency accommodates needs of students with disabilities during testing.</p>	<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> </ul>
<p style="text-align: center;"><b>Section 7 Work Study, Cooperative Education, &amp; Job Placement</b></p>		
<p style="text-align: center;"><b>Equity Requirement/ Legal Citation</b></p>	<p style="text-align: center;"><b>Indicators of Compliance</b></p>	<p style="text-align: center;"><b>Example Documentation</b></p>
<p><b>7.1 Opportunities Available to All</b></p>		
<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></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> </ul>

<u>Guidelines VII-A</u>		
<b>7.2 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.</p> <p><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) Guidelines VII-A</u></p>	<p>Workplace agreements 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> </ul>

<b>Section 8 Employment</b>		
<b>Equity Requirement/ Legal Citation</b>	<b>Indicators of Compliance</b>	<b>Example Documentation</b>
<b>8.1 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 inquires concerning disability, marital, or parental status.</p> <p><u>Title VI: 34 CFR 100.3(c)</u>  <u>Title IX: 34 CFR 106.51, 106.57, and 106.60</u>  <u>Section 504: 34 CFR 104.13 and 104.14</u>  <u>Guidelines VIII-A</u></p>	<p>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>• Employment practices or documents including: <ul style="list-style-type: none"> <li>• hiring policies and 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> </ul>
<b>8.2 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>Local agency or postsecondary institution 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>• Application form for employment</li> <li>• Vacancy announcements and advertisements</li> <li>• Recruitment letters or contacts</li> <li>• Personnel web site and other related recruitment documents</li> <li>• Published nondiscrimination announcement in newspapers, student handbooks, other college materials</li> </ul>
<p><b>8.3 Faculty Salary Scales Do Not Discriminate</b></p>		
<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>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 nondiscriminatory 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>• Faculty salary schedules and related policies</li> <li>• Faculty assignment information by race/ethnic group, sex, and disabled staff</li> <li>• A 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>
<p><b>8.4 Equal Employment Opportunities for Applicants with Disabilities</b></p>		
<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>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 disabled staff</li> <li>• Copies/description of policies, procedures, and criteria considered for hiring, promotion, retention, and tenure including professional and non-professional applications</li> </ul>