

Methods of Administration (MOA) Postsecondary Compliance Review Manual

May 2025

The Texas Higher Education Coordinating Board does not discriminate on the basis of race, color, national origin, gender, religion, age or disability in employment or the provision of services.

Table of Contents

Introduction	i
Federal Compliance Laws and Regulations.....	i
Overview of the Postsecondary Civil Rights Review Process.....	1
Steps for the Postsecondary Civil Rights Review Process	3
1. Selections of Postsecondary Subrecipients for Civil Rights Review	3
2. Compliance Review	3
3. Letter of Findings	4
4. On-Site Compliance Review	4
5. Corrective Action Plan.....	9
6. Reporting Review Findings and Voluntary Compliance Plans.....	9

Appendices

Appendix A: Summary of Federal and State Nondiscrimination Laws and Regulations.....	10
Appendix B: Sample On-Site Review Agenda	12
Appendix C: Developing a Corrective Action Plan	14
Appendix D: Timeline for Texas’ Postsecondary Civil Rights Compliance Review	2

Introduction

The United States Department of Education Office for Civil Rights (OCR) permits the Texas Higher Education Coordinating Board (THECB), as the recipient of federal funds through the Carl D. Perkins Career and Technical Education Act of 2006, to conduct civil rights reviews of institutions that receive Perkins funds for career and technical education (CTE) programs. The reviews help THECB identify, prevent, and remedy discrimination and ensure equal access to programs, courses, and other educational resources for postsecondary Texas students. THECB also provides technical assistance to help institutions achieve voluntary compliance with the federal nondiscrimination regulations.

This manual provides information about the civil rights review process. It serves as a guide to help postsecondary institutions understand and prepare for reviews. The manual describes how the review process works and details the types of materials, data, staff, and scheduling needed to ensure a smooth and successful review. It also highlights the importance of communication between postsecondary institutions and the Methods of Administration (MOA) Coordinator, the primary contact at THECB for civil rights reviews. The most crucial part of a successful civil rights review is the advance preparation by both postsecondary institutions and the MOA Coordinator at THECB.

Federal Compliance Laws and Regulations

- Title VI of the Civil Rights Act of 1964 and its implementing regulation at 34 C.F.R. Part 100 (Title VI), which prohibits discrimination based on race, color, and national origin by recipients of federal financial assistance.
- Title IX of the Education Amendments of 1972 and its implementing regulation at 34 C.F.R. Part 106 (Title IX), which prohibit discrimination based on sex in any educational program or activity receiving federal financial assistance.
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulation of 34 C.F.R. Part 104 (Section 504), which prohibits discrimination based on disability by recipients of federal financial assistance.
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulation at 28 C.F.R. Part 35 (Title II), which prohibits discrimination based on disability by public entities.
- Guidelines for Elimination Discrimination and Denial of Services Based on Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs, 34 C.F.R. Part 100, Appendix B (Guidelines)

Find a summary of these laws in [Appendix A](#). All schools receiving federal funds are required to comply with federal nondiscrimination laws. The United States Department of Education Office for Civil Rights monitors this compliance requirement.

Overview of the Postsecondary Civil Rights Review Process

1. Selection of Postsecondary Subrecipients for Civil Rights Review

- Texas’s Methods of Administration State Plan calls for THECB to identify at least nine post-secondary subrecipients of Perkins funds for compliance review civil rights reviews each year.
- THECB analyzes civil rights-related postsecondary data annually to develop a ranked list of postsecondary subrecipients to select for review.

2. Compliance Review

- THECB contacts the institution to provide notice of the upcoming compliance review, identify a campus liaison, schedule an orientation meeting, and set a date to start the review.
- THECB sends copies of the *Postsecondary Civil Rights Review Manual*, and any other necessary materials to the institution.
- The MOA Coordinator and review team meet with the liaison and appropriate campus staff to discuss the review process, materials needed, and review timeline.
- The institution completes the *Postsecondary Compliance Self-Assessment Checklist* using the [MOA Information Request Form](#) and provides necessary documentation, with the help of the MOA Coordinator and review team.
- The MOA Coordinator and review team review the [MOA Information Request Form](#) and documentation provided by the institution and request further information, if needed.

3. Letter of Findings

- THECB sends a Letter of Findings (LOF) to the institution detailing whether evidence of a violation was found for the standards reviewed during the compliance review process.
- The LOF will indicate one of the following:
 - The review did not find any areas of noncompliance.
 - The review did not find noncompliance, but THECB will conduct an on-site review.
 - The review found minimal areas of noncompliance requiring corrective action.
 - The review found noncompliance, and THECB will conduct an on-site review.

4. On-Site Compliance Review

- If the institution is selected for an on-site review, the MOA Coordinator and review team will meet with the campus liaison and appropriate campus staff to set a date for the on-site review, discuss the review process, and set a review schedule.
- The on-site review will include the following:
 - An entrance interview to go over the on-site review process and expectations.
 - Campus tours to conduct a comprehensive facilities accessibility review.

- Interviews of institution administrators, staff, and students
- An exit interview to explain preliminary findings and the reporting/compliance process.
- Documentation that a vendor has been hired to complete a facilities audit.

THECB will provide a new LOF to the institution after completion of the on-site review.

5. Corrective Action Plans

- If the compliance review or on-site review find areas of noncompliance, THECB and the institution prepare a Corrective Action Plan (CAP) for any corrective actions needed to remedy any violations (to be signed by the institution's president).

6. Reporting Review Findings and Corrective Action Plans

- THECB submits a Final Letter of Findings and signed Corrective Action Plan as part of a Civil Rights Review Report to OCR by December 31 of each even-numbered year.

Steps for the Postsecondary Civil Rights Review Process

1. Selections of Postsecondary Subrecipients for Civil Rights Review

Texas' Methods of Administration (MOA) State Plan, approved by the Office for Civil Rights (OCR), Texas Higher Education Coordinating Board (THECB), and Office of Public Instruction (OPI), calls for THECB to identify subrecipients of Perkins funds to be targeted for compliance review reviews. THECB performs compliance reviews of five postsecondary institutions and four on-site reviews of postsecondary institutions per year. THECB uses selection criteria, including date of last review, enrollment, and civil rights-related student demographic data, to rank institutions for review selection every year.

2. Compliance Review

After OCR develops a ranked list subrecipients to select for review, THECB notifies the selected postsecondary institutions of upcoming on-site reviews at least 30 days before the anticipated start of the compliance review.

Identifying a Campus Liaison

The civil rights review is a collaborative process between THECB and the postsecondary institution. Ongoing communication between campus staff and the MOA Coordinator is essential for a successful review. THECB encourages institutions to designate a key person as the campus liaison to manage communications with the MOA Coordinator to streamline the process.

Compliance Review Orientation

The MOA Coordinator will contact the institution to schedule an orientation meeting (by phone, online, or in-person) to discuss the review process, schedule a compliance review start date, and discuss the review timeline and expectations. Campuses may include other relevant staff and administrators in the orientation meeting.

At or before the orientation meeting, THECB will provide copies of the *Postsecondary Civil Rights Review Manual*, and any other necessary materials to the institution. These documents will help guide institutions through the review process.

Conducting the Compliance Review

The compliance review consists of compiling documentation and other material demonstrating compliance for all applicable civil rights standards/guidelines. All institutions undergoing a review must complete the *Postsecondary Compliance Self-Assessment Checklist* using the [MOA Information Request Form](#) through Smartsheet. The MOA Coordinator and review team will coordinate and guide the process for the campus liaison and other campus staff and help identify and collect documentation that demonstrates civil rights compliance.

Review Timeline

The MOA Coordinator and review team may hold additional meetings with the campus liaison to discuss the review process, materials, and timeline. THECB expects the compliance review to take 60 to 90 days. The complete timeline of the compliance review process is available in [Appendix D](#).

3. Letter of Findings

THECB will provide a Letter of Findings (LOF) to the postsecondary institution within 30 days of the completion of the compliance review. The LOF will discuss the findings of the compliance review, provide the compliance status of each of the standards/guidelines reviewed, describe the rationale for the compliance status, and identify corrective action (if needed). In addition, the LOF will indicate one of the following:

- The review did not find any areas of noncompliance, but the institution must continue to comply with all civil rights requirements.
- The compliance review found minimal areas of noncompliance, but the institution must take corrective action through a Corrective Action Plan (CAP) for the standards identified as needing corrective action.
- The compliance review found possible civil rights violations; the institution may need to take corrective action through a CAP.

For institutions receiving on-site reviews, THECB will issue a LOF after completion of the review.

The postsecondary institution will have 30 days to review and respond to any LOF. The institution will correct any inaccuracies or provide additional information to clarify findings. In some instances, institutions may have corrected items identified as needing corrective action. THECB will change the LOF to reflect the input and further information from the institution and send an updated Letter of Findings to the institution within 30 days of receipt of the institution's response. This final LOF becomes the official findings of the civil rights review.

4. On-Site Compliance Review

For post-secondary institutions, the on-site review requires advanced preparation before the site visit, including preparing documentation; identifying and scheduling administrators, staff, and students for interviews (that occur during the on-site visit); and scheduling staff to provide tours (that occur during the on-site visit).

Required Documentation

THECB requires several different types of materials for compliance review and on-site review. The institution will collect most of these materials during the compliance review process (see [Section 2. Compliance Review](#)). Requested documents, records, and other materials must be compiled in their entirety and submitted to the MOA Coordinator electronically at least 30 days before the compliance review or on-site review. THECB will review all materials provided by the institution before the on-site visit.

Required materials should include:

1. Compliance Review Postsecondary Self-Assessment Checklist
 - a. Completed self-assessment checklist, including supporting documentation.
 - b. Submit documentation using the [MOA Information Request Form](#)
2. Facilities Audit (On Site review Only)
 - Institutions should hire a vendor to complete the facilities audit. Institutions can use Perkins funds for this task. Institutions will need to submit a budget amendment to their Perkins Basic Grant under schedule D to use the allocated money for the current grant year. Confirmation of hiring a vendor for the facilities audit must be submitted with materials BEFORE the On-Site Visit.
 - **THECB will work with institutions on timelines for completion of the facilities audit. Requirements are on page 2 of the On-Site Postsecondary Compliance Checklist.**

Uploading Documents for Review

1. Select the topic for which the documentation is submitted (submit each topic separately) (example select Topic # 1 attach documents and press submit, then in separate submission 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 9 documents per submission);
3. Select to cc to yourself as desired; and press submit.
4. If there is Personally Identifiable Information (PII) included in anything you send, please ensure that it is properly redacted 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 questions.

Attention:

Label the document as follows: MOA Documentation Submission_Institution Name_Topic #.

Example: MOA Documentation_Alamo CC_01 Administrative Requirements

Interview Preparation

As part of the on-site visit, the MOA Coordinator and on-site review team will interview a variety of campus staff and students and hold an entrance interview and exit interview. The campus liaison and MOA Coordinator will work together to set a basic interview schedule with several interview sessions available during the on-site visit.

Each team member will need a private office or conference room to conduct the interviews, and the on-site review team will need a workspace with access to Wi-Fi for the on-site visit.

The on-site review team may conduct both individual and group interviews. For example, during one time slot, all team members may interview a set of staff, and during the next slot, each team member may individually interview a student or group of students.

The postsecondary institution is responsible for identifying individuals for interviews and scheduling specific times and locations for individuals' interviews. The institution has the option to schedule interviews during any of the sessions. For example, it may be more convenient to schedule students in one interview session or three different interview sessions. In addition, it is important to include minorities, individuals with disabilities, and individuals in non-traditional roles in the interviews for employees, as well as students who do not necessarily fall into these categories.

The MOA Coordinator and campus liaison will collaborate to prepare the final interview schedule before the on-site visit. The schedule should include the team member name(s), interviewee name(s), position(s), time, and room and building location of the interview. There may be a need to schedule interviews at off-campus locations. Interviewees should be informed of the scheduled time for their interview and where they are to meet an on-site team member. See [Appendix B](#) for a sample interview schedule showing the numbers of interviews, types of interviewees, and approximate time required.

Campus Tour Preparation

Post-secondary institutions must provide a guided tour of all the facilities that the institution owns and leases, including where classes are held and where students receive instruction or services. Tours should include the facilities director and a walkthrough of representative classrooms, lab, shops, auditoriums, sports facility areas, dormitories, student housing, and administrative and student service areas. The on-site review team reviews all restrooms.

The MOA Coordinator and campus liaison will work together to set the tour schedule during the on-site visit. Institutions are responsible for ensuring that the facilities director and other staff are available for the tour and that they have access to all the facilities. See [Appendix B](#) for a sample tour schedule showing the number of tours and approximate time required.

On-Site Civil Rights Review Preparation Checklist

This checklist serves as an aid for campuses to complete the required preparations for the on-site review **before** the date of the on-site visit. Campuses may need to make additional preparations not on the checklist. The campus liaison should confirm with the MOA Coordinator that the campus has all necessary preparations in place ahead of time.

- Select a staff person to serve as the campus liaison.
- Assemble and label the required general documents, including:
 - College catalog

- Student handbook
 - View book
 - College directory
 - College organizational chart
 - Other general information about the college
- Prepare maps/layouts of campus buildings, parking lots, and locations.
 - Complete the Postsecondary Civil Rights Review Self-Assessment Checklist, including supporting documentation (see [Section 2. Compliance Review](#)).
 - Schedule and arrange for campus tours with the facilities director or other staff.
 - Reserve a workspace for the on-site review team that includes access to Wi-Fi.
 - Schedule times, locations, and staff for the entrance and exit interviews.
 - Reserve rooms for interviews by the on-site review team.
 - Schedule times and locations for on-site review interviews.
 - Notify and schedule the following individuals for on-site review interviews:
 - College president/dean/CEO
 - Academic affairs and student services administrator
 - Title VI coordinator
 - Human resource director
 - Facilities director
 - Counselors (female and male)/Counselors for students with disabilities
 - Title IX coordinator
 - Section 504 coordinator
 - Financial aid officer
 - Faculty (occupational and general education, female, male, minority, disabled)
 - Students (female, male, minority, disabled)

Entrance Interview

The MOA Coordinator and on-site review team will conduct an entrance interview on the first day of the on-site visit. The purpose of this meeting is to introduce the MOA Coordinator and on-site review team members to postsecondary institution staff, to acknowledge appreciation for the effort put into preparing for the visit, to provide background information about the authority and components and procedures of the compliance review, to explain the Texas Higher Education Coordinating Board philosophy regarding the compliance review process, and to provide an overview of on-site activities.

THECB encourages the institution to invite any staff members the administration feels would be interested in or would like more information about the on-site civil rights review to this meeting. The MOA Coordinator and campus liaison will set the time and location of the entrance interview.

During the entrance interview, the MOA Coordinator will be responsible for calling the entrance interview meeting to order and introducing the on-site review team.

The on-site review team will be responsible for introducing themselves, explaining the overall plans and procedures for the on-site review, and responding to questions about the on-site civil rights compliance review process.

The president/dean/CEO will provide an orientation to the institution, which may include: the mission and philosophy of the institution, a brief history of the institution, enrollment trends, student demographics, a facility review, a review of the programs and majors offered, and strong points and problem areas for the institutions and its programs.

The entrance interview typically takes no longer than 45 minutes, depending on the number and type of questions submitted.

Interviews: Administrators, Staff, Faculty, and Students

The on-site review team will conduct interviews of administrators, staff, faculty, and students per the interview schedule prepared in advance of the on-site visit. On-site review team members will ask a set of predetermined questions. Questions vary depending on the roles of the interviewees. Team members will also take notes. Names of interviewees or specific quotes will not appear in any report or findings. For more information on interviews, see [Interview Preparation](#) in Section 2.

Tours

The on-site review team will tour all facilities the institution owns and leases and conduct a comprehensive facilities accessibility review per the tour schedule prepared in advance of the on-site visit. During the tours, the on-site review team may review the materials provided by the institution before the on-site visit. For more information on tours, see [Campus Tour Preparation](#) in Section 2.

Exit Interview

An exit interview not to exceed 60 minutes will be held on the last day of the on-site visit. The on-site review team will conduct the meeting, and the president/dean/CEO will select the campus staff who attend the meeting. The exit interview is designed to provide preliminary impressions of on-site findings and highlight positive findings and review areas that will need corrective action. The post-on-site review activities and timeline will be reviewed, including the preliminary and final Letter of Findings. In addition, the process to develop a Voluntary Compliance Plan will be reviewed.

Letter of Findings

THECB will provide a Letter of Findings to the postsecondary institution within 30 days of the completion of the on-site review. The LOF will address the findings of the, discuss the findings of the on-site review, provide the compliance status of each of the standards/guidelines reviewed, describe the rationale for the compliance status, and identify corrective action (if needed). See [Section 3. Letter of Findings](#) for more information on the LOF.

5. Corrective Action Plan

The postsecondary institution has 60 days following the date of the final Letter of Findings to

develop a Corrective Action Plan (CAP). A CAP addresses how the institution will correct or remediate specific noncompliance items in the final LOF. The CAP will define actions needed to be taken, timelines, personnel responsible, technical assistance needs, and monitoring and evaluation results and outcomes. See [Appendix C](#) for more information on developing a CAP and for a sample of the recommended format.

The institution must submit a draft of the CAP to the MOA Coordinator within 60 days. The MOA Coordinator will review the CAP and may recommend modifications to the plan in consultation with campus staff. The MOA Coordinator will issue a letter of acceptance of the VCP within 30 days of its receipt.

6. Reporting Review Findings and Corrective Action Plans

THECB submits the final LOF and the CAP as part of a report to the United States Department of Education Office for Civil Rights by December 31 of each even-numbered year.

Appendix A: Summary of Federal and State Nondiscrimination Laws and Regulations

State agencies, which are responsible for the administration of career and technical education (CTE) programs, are required to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education under the *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* ([34 C.F.R. Part 100, Appendix B](#); [34 C.F.R. Part 104, Appendix B](#); [34 C.F.R. Part 106, Appendix A](#)).

The purpose of the compliance review was to determine the postsecondary institutions' compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at [34 C.F.R. Part 100](#), which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at [34 C.F.R. Part 106](#), which prohibit discrimination on the basis of sex; and
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at ; [34 C.F.R. Part 104](#), which prohibits discrimination on the basis of disability.

State agencies conduct compliance reviews on any or all of the issue areas outlined in the Guidelines:

1. Administrative Requirements (Section IV.O).
2. Recruitment, Admissions, and Counseling (Section IV.A, K, N, and L, Section V.A-E).
3. Accessibility (Section IV.N).
4. Comparable Facilities (Section VI.D).
5. Services for Students with Disabilities (Section IV.N and VI.A).
6. Financial Assistance (Section VI.B).
7. Work-study, Cooperative Programs, and Job Placement (Section VII)
8. Housing (Section VI.C) ; and
9. Employment (Sections VIII.A-F).

Key Documentation

1. [Vocational Education Guidelines](#)
2. [Federal 2020 Memorandum of Procedures \(MOP\)](#)
3. **Responsibilities of All State Agency Recipients-** Appendix B to Part 100—Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs
 - a. See Section II (A): <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-I/part-100/appendix-Appendix%20B%20to%20Part%20100>
4. **State Agencies Performing Oversight Responsibilities:** Appendix B to Part 100—Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs

- a. See Section II (B): <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-I/part-100/appendix-Appendix%20B%20to%20Part%20100>
- b. **Assist subrecipients to identify unlawful discrimination and instruct them on remedies for and prevention of such discrimination.** See Section II (B) (3): <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-I/part-100/appendix-Appendix%20B%20to%20Part%20100>
- c. **Periodically reporting its activities and findings to OCR in Biannual Report.** See Section II (B) (4): <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-I/part-100/appendix-Appendix%20B%20to%20Part%20100>

Appendix B: Sample On-Site Review Agenda

Day 1

On-Site Review Team Arrives on Campus	8 a.m.
Entrance Interview	8:30 a.m.
Interview Set I (Group) Administrators Deans (CTE) Financial Aid Director, Financial Aid Officer	9:15 a.m.
Break	10 a.m.
Interview Set II (Group) Title IX/Section 504 Coordinator ADA Coordinator Human Resources Director	10:15 a.m.
Interview Set III (Group) 5 CTE Students	11:15 a.m.
Lunch	12:15 p.m.
Facility Tour, Part I	1:30 p.m.
Wrap Up	4:30 p.m.

Day 2

Interview Set IV (Group) Marketing Director Public Relations Staff Webmaster	8:15 a.m.
Interview Set V (Group) Minority CTE Student(s) Disabled CTE Student(s) Non-Trad CTE Student(s)	9:15 a.m.
Break	10 a.m.

Interview Set IV Group) 10:15 a.m.
Registrar
Admissions Staff
Enrollment Services

Interview Set V (Group) 11:15 a.m.
Advisors
Career Counselors
Student Services Staff

Lunch 12:15 p.m.

Facility Tour, Part II 1:30 p.m.

Wrap Up 4:30 p.m.

Day 3

Exit Interview 9:15 a.m.

Additional Facility Review (If needed) 10:15 a.m.

Appendix C: Developing a Corrective Action Plan

Definition

A Corrective Action Plan (CAP) is a written plan developed by the postsecondary institution outlining the exact procedures and actions it will take to correct items or issues identified during the on-site monitoring visit. All corrective items to be addressed are included in a Letter of Findings (LOF) produced by the Texas Higher Education Coordinating Board (THECB) Methods of Administration (MOA) Coordinator.

Timeline for Submission

Institutions have a maximum of 60 calendar days following the date on the cover letter of the Letter of Findings to submit a CAP. Upon request, THECB staff will provide technical assistance for the development and implementation of the CAP. Institutions should submit the VCP to the MOA Coordinator.

Procedure for Development

An individual or team representing the institution will develop the CAP. If the team approach is used, suggested members include administrators, counselors, CTE/academic faculty, and any other pertinent staff. Approval by the local administrative board is recommended.

Components of a Corrective Action Plan

The following information must be included in a CAP:

- Name of the postsecondary institution
- Date of submission of the plan
- Identification of each noncompliance item identified in the LOF as needing corrective action
- Statement of THECB's recommendation(s) for compliance
- Statement of planned action to be taken to comply
 - Identification of the activities/steps, such as specific tasks that must be accomplished to complete the planned corrective action
 - Timeline(s), including the date(s) each activity/step will begin and be completed
 - Person/position responsible for initiating and monitoring the implementation of the tasks or activities
- Monitoring and evaluation: Identification of tangible examples, products, or outcomes that can be examined and assessed by THECB staff to determine whether the institution has made the changes or provisions necessary for complying (pictures, etc.)
- Signature of institution president/CEO

Notes:

- Action items identified in CAPs should be completed as soon as possible, with no item taking more than two years to complete.
- Every CAP must include all items listed above.
- If using the sample below, a separate page should be used for each noncompliance item.

CORRECTIVE ACTION PLAN

[CAMPUS]

This Corrective Action Plan addresses the findings described in the Letter of Findings from the Texas Higher Education Coordinating Board (THECB), dated [DATE], which summarized the results of THECB’s compliance review conducted on [DATE].

Section	Specific Corrective Action to be Completed	Responsible Person(s)	Target Completion Date	How Completion of Remedy will be Reported and Verified to THECB
EXAMPLE 1.3 Annual Public Notification: Expand dissemination of the annual notice of nondiscrimination to the public in English and Spanish	Publish the annual notice of nondiscrimination in <i>The Sample Times</i> , in the local Spanish-language newspaper, and on the website in English and Spanish before the first day of the 2021-2022 school year.	President	August 2021	Will provide a copy of the published notice from both newspapers to THECB.
EXAMPLE 6.2 Career and Technical Education Programs Open to All Students: Eliminate and prevent any steering of students into or away from CTE programs based on sex or disability.	Provide training to counselors regarding sex stereotyping and the prohibition against directing or urging students to enroll in a career or program or predicting a student’s prospects for success in any career or program based upon the student’s sex or disability. Provide training to counseling staff and other administrators and faculty on the requirements of Title IX related to pregnancy.	President	September 2021	Will send THECB an email confirming that the training(s) occurred, including the date(s) of the training(s), the agenda(s) for the training(s), and the number of counselors and any other college personnel that attended.

Section	Specific Corrective Action to be Completed	Responsible Person(s)	Target Completion Date	How Completion of Remedy will be Reported and Verified to THECB

 President Signature

 Date

Appendix D: Timeline for Texas' Postsecondary Civil Rights Compliance Review

Duration	Phase of Compliance Review Program
30 days	Notification period ahead of review start date
60 to 90 days	The campus under review gathers and submits necessary documentation. For site visits, THECB schedules visit to collect physical accessibility and comparable facilities documentation.
30 days	THECB drafts and provides Letter of Findings (LOF). *
30 days	The campus under review responds to LOF with any additional information or explanations.
30 days	THECB provides an updated LOF based on the campus's response.
60 days	The campus under review completes and submits a Corrective Action Plan (CAP) to THECB addressing noncompliance items in the LOF.

* In the instance, a compliance review triggers an on-site review. Campuses will be notified of the visitation date **30 days** before to allow time to gather required materials and schedule necessary interviews.

Texas Higher Education

COORDINATING BOARD

This document is available on the Texas Higher Education Coordinating Board website:
<http://highered.texas.gov>.

For more information, contact:

Dr. Audra Patridge
Postsecondary State MOA Coordinator
Community and Technical Colleges-Workforce Education
Texas Higher Education Coordinating Board
P.O. Box 12788
Austin, TX 78711
PHONE 512-427-6240
Audra.Patridge@highered.texas.gov