



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**



**COMMUNITY AND  
TECHNICAL COLLEGES**  
*Washington State Board*

# *Washington: Methods of Administration*

**2020**

# WASHINGTON: METHODS OF ADMINISTRATION

*State Plan for July 2020 Submission*

**June 2020**

DRAFT

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## **Office of Superintendent of Public Instruction**

Rebecca Wallace, Executive Director, Career and Technical Education

Deifi Stolz, MOA Program Specialist, Career and Technical Education

Clarisse Leong, CTE Operations Manager, Career and Technical Education

Samantha L. Sanders, Assistant Director, Career and Technical Education

Dierk Meierbachtol, Chief Legal Officer

Sarah Albertson, Managing Attorney, Equity and Civil Rights

Gayle Pauley, Assistant Superintendent, Special Programs & Federal Accountability

Timothy McNeely, Director, Consolidated Program Review & Rural Education, Special Programs & Federal Accountability

Jon Claymore, Director, Office of Native Education

Glenna Gallo, Assistant Superintendent, Special Education

Alyssa Fairbanks, Dispute Resolution Team Lead and Investigator, Special Education

Deb Came, Assistant Superintendent, Assessment and Student Information

Katie Weaver-Randall, Director, Student Information

Kathe Taylor, Assistant Superintendent, Learning and Teaching

## **State Board for Community and Technical Colleges**

Maryam Jacobs, System Internal Auditor and MOA Coordinator

Steve Lewandowski, Chief Architect, Capital Budget

John Ginther, Accounting and Business Services Division

Nate Humphrey, Director, Workforce Education

Tim McClain, Program Administrator, Workforce Education

# PURPOSE AND BACKGROUND

On February 6, 2020 the U.S. Department of Education’s Office of Civil Rights (OCR) and Office of Career, Technical, and Adult Education (OCTAE) jointly issued an updated Memorandum of Procedures (MOP) to inform the development of the state’s plan for administering Methods of Administration (MOA) for the purposes of ensuring the civil rights of students participating in CTE programs.

Through this new MOP, states were given the option to maintain the current MOA processes and plan or to create a new plan. In light of the changes of Perkins V, the state’s existing processes for the administration of Perkins and Civil rights laws, its monitoring and technical assistance practices, and the focus on special populations in the newly developed Perkins V plan, Washington state has elected to submit a new MOA plan, which will highlight implementation plans unique to both the secondary and postsecondary system. The plan oversight will be provided by the state’s Workforce Training and Education Coordinating Board (WFB), the agency with administrative oversight of Perkins V and the MOA plan.

For secondary programs, OSPI will guide the administration of the MOA requirements in a cohesive, consistent manner – placing special emphasis on the alignment of existing requirements and processes and the focus on providing technical assistance.

For postsecondary institutions, the Washington State Board for Community and Technical Colleges (SBCTC) has elected to shift its primary focus to technical assistance and create a partnership with postsecondary institutions to allow for greater self-monitoring. In addition to efforts to provide technical assistance, SBCTC has elected to use a risk-based approach for monitoring, to ensure resources are concentrated on institutions and review areas with the highest risk of non-compliance.

## Guiding Principles

The new Washington MOA plan will be developed with the following guiding principles in mind:

- The state has a responsibility to ensure that all students, regardless of race, color, national origin, sex, or disability, have equal access and opportunities to succeed in CTE.
- Students regardless of geography, demographics, or socioeconomic status must have equitable access to high quality CTE programs.
- A primary responsibility of the SBCTC and OSPI agencies is to utilize available data to support leveraging resources and the prioritization of technical assistance to support subrecipients to close the opportunity, access, and performance gaps for students.
- The new Comprehensive Local Needs Assessment (CLNA) requirement will provide subrecipients data, including the evaluation of the performance for special populations and subgroups. The CLNA requirement will drive intentional review and planning for subrecipients to support equal access to high-quality CTE courses and support the closure of performance gaps.
- Subrecipients should focus efforts on engaging in meaningful evaluations of their programs, and systems should be streamlined where possible. The state administrative agencies should focus efforts on providing technical assistance and resources.

- All work should lead with objectivity, common sense, compassion, and communication.

The state's MOA plan will align with the state's Perkins plan. Within Washington's Perkins plan is the following Mission, Vision, and Values that will lead the implementation of our work.

**MISSION:**

The Washington state Perkins plan uses an industry-informed, equity-focused approach to support the design, development, implementation and improvement of career and technical education.

**VISION:**

Support high quality, data-informed CTE pathways that develop a skilled workforce, ensure business and industry thrive and expand across the state, and enable every Washingtonian to obtain living wage careers through credentials of workplace value.

**VALUES:**

- The Washington state agencies entrusted with administering the Perkins plan are committed to the following values, which prioritize equity and access for individuals served by Perkins:
- Using quantitative and qualitative data to inform decisions
- Engaging a diverse range of stakeholders, reflective of the communities they serve, to inform policies and practices
- Leveraging and aligning federal and state policies and funding to improve student outcomes
- Responding to labor-market gaps and emerging industries and occupations in the design of programs of study
- Promoting life-long learning that develops the knowledge and skills that allow individuals to remain competitive in chosen occupations/careers

## **Oversight Responsibility Requirements**

Administration and monitoring of Washington's Career and Technical Education programs are handled by OSPI at the secondary level (7-12 grade) and SBCTC at the postsecondary level. Washington must comply with multiple federal and state requirements in the administration of the state's CTE and professional/technical programs including those mandating that agencies may not require, approve of, or engage in any discrimination or denial of services on the basis of race, color, national origin, sex, or disability in performing any of the following activities:

1. Establishment of criteria or formulas for distribution of federal or state funds to CTE programs in the State;
2. Establishment of requirements for admission to or requirements for the administration of CTE programs;

3. Approval of action by local entities providing CTE. (For example, a state agency must ensure compliance with Section IV of these Guidelines if and when it reviews a CTE agency decision to create or change a geographic service area.);
4. Conducting its own programs. (For example, in employing its staff it may not discriminate on the basis of sex or disability.)

Based on the updated Memorandum of Procedures (MOP) issued from the Assistant Secretary of the Office for Civil Rights and the Assistant Secretary of the Office of Career, Technical, and Adult Education from the Department of Education on February 6, 2020, and the 1979 MOA guidelines, Washington must submit an MOA plan. The administration and monitoring related to Methods of Administration (MOA) requirements must include:

1. Collecting and analyzing civil rights related data and information that subrecipients compile for their own purposes or that are submitted to state and federal officials under existing authorities;
2. Conducting periodic compliance reviews of selected subrecipients (i.e., an investigation of a subrecipient to determine whether it engages in unlawful discrimination in any aspect of its programs). Upon finding unlawful discrimination, notifying the subrecipient of steps it must take to attain compliance and attempting to obtain voluntary compliance;
3. Providing technical assistance upon request to subrecipients. This includes assisting subrecipients identify unlawful discrimination and instructing them in remedies for and prevention of such discrimination;
4. Periodically reporting its activities and findings under the foregoing paragraphs, including findings of unlawful discrimination under paragraph 2, immediately above, to the Office for Civil Rights.

# STATE OVERVIEW

## Alignment with Perkins State Plan

### OSPI

OSPI's mission is to, "transform K-12 education to a system that is centered on closing opportunity gaps and is characterized by high expectations for all students and educators. We achieve this by developing equity-based policies and supports that empower educators, families, and communities." With agency values that include ensuring equity and achieving excellence through continuous improvement, OSPI has an agency focus on serving all students; which will include focused efforts to expand access to CTE for special populations. OSPI's equity statement is, "Each student, family, and community possesses strengths and cultural knowledge that benefits their peers, educators, and schools."

The agency further states, "Ensuring educational equity:

Goes beyond equality; it requires education leaders to examine the ways current policies and practices result in disparate outcomes for our students of color, students living in poverty, students receiving special education and English Learner services, students who identify as LGBTQ+, and highly mobile student populations.

Requires education leaders to develop an understanding of historical contexts; engage students, families, and community representatives as partners in decision-making; and actively dismantle systemic barriers, replacing them with policies and practices that ensure all students have access to the instruction and support they need to succeed in our schools."

The OSPI CTE department will rely on the expertise of multiple internal departments and divisions to ensure that the alignment of our MOA and Perkins state plan focuses on closing opportunity gaps, and expand access for students. Examples of these critical partnerships include:

- Special Programs & Federal Accountability: Working with staff from the Migrant and Bilingual department, Consolidated Program Review, and Office of Native Education (ONE)
- Office of Student Engagement and Support: Working with staff within student support programs such as institutional education, homeless education, homeless stability, and foster care.
- Learning and Teaching: Working with content leads to ensure equitable academic supports and access to high quality education for all students.
- Special Education: Working in partnership to build consistent resource and communication tools for LEAs to support students with disabilities and to ensure that CTE educators lead in the implementation of inclusionary practices.
- Equity and Civil Rights: Working with staff to align civil rights policy, inform accessibility issues, and ensure aligned guidance to school districts and response to violations.



- Assessment and Student Information: Working with staff to align state collected achievement data, student information, and publicly reported indicators to position state and local institutions in making data driven investments.

## **SBCTC**

SBCTC's vision statement reads, "Leading with racial equity, our colleges maximize student potential and transform lives within a culture of belonging that advances racial, social, and economic justice in service to our diverse communities." Accordingly, the agency dedicates a full section to equity and access in both its comprehensive local needs assessment (CLNA) and Perkins Plan application. With respect to the former, all colleges must articulate an equity-based approach to maximizing student potential in CTE programs, describe methods of providing outreach to special and/or historically underserved populations, list financial and support resources available to members of underserved populations, and explain how their implementation of programs of study ensures equal access to high-quality career and technical education. In addition, the following section of the CLNA requires an analysis of disaggregated performance data, and where deficiencies, discrepancies, or gaps in performance exist, the college must develop an action plan to address them.

These priorities and strategies must be incorporated into the colleges' local application and annual Reports of Accomplishment, which have their own sections on improving equity and access.

In the documents cited above, the colleges summarize programs, services, and initiatives designed to recruit and support students from special populations and report on the findings and action plans associated with their CLNA. Insufficient responses are returned for revisions and/or addressed through technical assistance or monitoring visits.

## **State Response**

The state's new MOA plan will allow OSPI and SBCTC staff to focus on the development of communication and resource tools to support CTE directors, college administrators, educators and faculty, school counselors, district level administrators, and support staff who directly impact students that represent special populations as described in Perkins V. Additionally, the OSPI CTE office will continue to support monitoring of equitable access to CTE programs for all students through the Consolidated Program Review (CPR) process, via desk and on-site reviews. These monitoring experiences are another step in ensuring equitable access, and encouraging local districts to prioritize policy and funding to result in expanded access to underserved students. Additionally, as sub-recipients apply for Perkins funds, the districts and colleges are required to adhere to the state and federal guidelines, including non-discrimination requirements.

School districts and colleges will utilize the results of their Comprehensive Local Needs Assessment (CLNA) and the available disaggregated data to determine how to invest their Perkins V allocations to intentionally close opportunity, access, and performance gaps across members of special populations. [Washington's CLNA Form is available as Appendix A.](#)

As referenced throughout this document, and defined by Perkins V, “special populations include: individuals with disabilities; individuals from economically disadvantaged families, including low-income youth and adults; individuals preparing for non-traditional fields; single parents, including single pregnant women; out of workforce individuals; English learners; homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); youth who are in, or have aged out of, the foster care system; and youth with a parent who is a member of the armed forces and is on active duty.

### **State Perkins Plan Investments**

The Washington State Perkins Plan identifies the priority of intentional investment to support special populations. From the state plan, Washington will administer Leadership and Perkins Reserve funds in alignment with the General Authority and Permissible Uses of Funds articulated in the Perkins V Act. In alignment with the Washington Perkins Plan Mission, Vision, and Values, SBCTC and OSPI will commit to assessing and evaluating local and statewide performance data to identify performance and opportunity gaps and establish priorities for local and/or state funding. Highly informed by the local Comprehensive Local Needs Assessments (CLNAs) and state level data, and with a commitment to diversity, equity, and inclusion, the SBCTC and OSPI will invest Leadership funding in the following areas that support closing gaps and specifically serving special populations:

- **Improved Access and Outcomes for Special Populations:** Examples include investing in programs and activities that increase student access, engagement, and success in programs that prioritize representation of members of special populations. These may include but are not limited to: partnerships with tribes and tribal organizations and business and industry leaders; supporting participation for non-traditional employment; lowering barriers identified by school districts and colleges in rural communities; and activities that eliminate inequities in access to high-quality programs.

# Staff and Process Support

## OSPI

The Career and Technical Education department is organized by three offices that provide direct technical assistance to school districts, skill centers, and tribal compact schools that operate CTE programs. The Office of Program and Pathway Support provide direct technical assistance to school districts in the program areas of Agriculture Education, Business and Marketing, Family and Consumer Science, Health Science, STEM, and Skilled and Technical Sciences. The Office of Operations Support provides oversight of compliance, data, and funding associated with the Federal Perkins Act, and state law and apportionment. The Office of Project Development provides technical assistance for CTE initiatives including CTE Pathways, Career Connected Learning, course equivalencies, and Core Plus. The department staff all provide direct technical assistance and support, and staff in the offices of Program and Pathway Support and Operations Support have direct responsibilities related to Perkins administration, and the Consolidated Program Review (CPR). Throughout the CPR monitoring process, CTE staff conduct both desk and on-site reviews of criteria, as identified in the [CTE/Perkins CPR 2019-20 Checklist in Appendix B](#). The CPR checklists are reviewed and updated on an annual basis to support the continuous improvement of subrecipient programs.

## Other Departments and Processes

In addition to the OSPI CTE Department, the OSPI Equity and Civil Rights Office works to ensure that each student has equal access to public education without discrimination. The Equity and Civil Rights Office is responsible for monitoring and enforcing school districts' compliance with state and federal civil rights laws, including chapter 28A.640 of the Revised Code of Washington (RCW); chapter 28A.642 RCW; chapter 392-190 WAC; Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; and Title II of the Americans with Disabilities Act of 1990. The Equity and Civil Rights Office promulgates rules and guidelines to eliminate discrimination in Washington public schools. The office also provides technical assistance and training to school district staff regarding their responsibilities under state and federal nondiscrimination laws, including topics related to discriminatory and sexual harassment, Section 504 and students with disabilities, gender-inclusive schools, nondiscrimination in student discipline, sex equity in athletics, and language access for limited-English proficient families.. The Equity and Civil Rights Office monitors school district compliance through discrimination complaint investigations, agency-initiated compliance reviews, and Consolidated Program Review.

## Civil Rights Complaint Process

OSPI regulations, WAC 392-190-065 through 392-190-075, outline a grievance procedure all school districts must use in responding to complaints of discrimination. In accordance with this procedure, anyone who believes unlawful discrimination is or has taken place in a school district's programs or activities may submit a written discrimination complaint to any school or district administrator or compliance coordinator (including a civil rights compliance coordinator, Title IX

coordinator, or Section 504 coordinator). Upon receipt of a written complaint, the school district must, within 30 calendar days, conduct an investigation and respond to the complainant with the outcome of the investigation and any corrective measures the school district determined are necessary to address any discrimination that occurred. If a complainant disagrees with the school district's determinations, they may submit an appeal to the school board and then a complaint to OSPI's Equity and Civil Rights Office.

### **Special Education Complaint Process**

The OSPI Special Education Department works to ensure that each student with a disability, eligible for special education services has access to a free appropriate public education (FAPE). The Special Education Department provides guidance to support understanding of special education processes, requirements, and best practices within school districts. The department provides direct technical assistance and resources related to special education to districts, parents, and community members. The Special Education Department also conducts monitoring through the Washington Integrated System of Monitoring (WISM) and oversees the formal dispute resolution options required by the Individuals with Disabilities Education Act (IDEA), which include mediation, written complaints, and due process hearings. The department's dispute resolution team conducts the written state complaint investigations, while OSPI contracts with Sound Options Group to provide mediation and the Office of Administrative Hearings to provide due process hearings.

The OSPI Special Education Department has a written state complaint process, the special education citizen complaint (SECC) process, that can be utilized to resolve disputes that allege procedural violations of Part B of the IDEA, federal implementing regulations, and Washington state special education regulations (WAC 392-172A). The SECC process can also be used to investigate allegations regarding substantive denials of FAPE and allegations related to the failure to implement mediation agreements or resolution agreements resulting from due process.

Any organization or individual, including an organization or individual from another state, may file a written, signed complaint that OSPI, or a subgrantee of OSPI (e.g., an educational service district (ESD), school district, educational service agency (ESA), charter school, etc.) is violating or has violated Part B of the IDEA or implementing regulations, or that the subgrantee is not implementing a mediation agreement or resolution agreement. Once OSPI opens a complaint investigation, OSPI has 60 days to complete an independent investigation, which may include document review, interviews, and on-site visits. Throughout the complaint process, the district and complainant have an opportunity to share relevant information, including, if applicable, information related to specially designed instruction (SDI) that is to be provided in support of CTE. At the end of the 60-day investigation, OSPI will issue a decision, and if a violation is found, order corrective action.

### **SBCTC**

SBCTC provides college oversight and technical assistance in civil rights matters by two divisions, the Budget & Finance and Education division. The Education Division's Policy Associate and

Program Administrator for Workforce Education are chiefly responsible for administering and monitoring Perkins funding in the form of the Perkins Plan, Perkins Leadership Block, Non-Traditional Employment & Training, Corrections Education, and Special Projects grants. All Perkins grants require annual applications and year-end Reports of Accomplishment that are reviewed, remarked upon, and scored by the Program Administrator. These are informed by the colleges' Comprehensive Local Needs Assessments and SBCTC-generated disaggregated performance data. All but two (Corrections Education and Special Projects applications) of these reporting mechanisms include specific sections and multiple questions on equity and access. All of these information sources – along with the colleges' Program of Study Verification Forms, Advisory Committee evaluations, and faculty certification records – provide the basis for on-site monitoring visits, which investigate even more thoroughly topics of diversity, equity, and inclusion. Until the transition to Perkins V, each college was monitored on a three-year rotation; however, like the Budget & Finance division, the Workforce Education department will be adopting a risk-based approach as detailed in the Washington State Perkins Plan.

Technical assistance from the Workforce Education department comes in a variety of forms. In addition to the monitoring activities described above, which always concludes with an exit letter outlining findings and recommendations, staff present on Perkins at quarterly, statewide Workforce Education Council (WEC) meetings, have facilitated daylong Perkins V and CLNA trainings, host annual technical assistance webinars prior to the release of grant applications, draft and disseminate handbooks and guidance memos, chair Perkins workgroups and committees, and are available upon request by phone, email, video conferencing, or in-person appointments. Whenever necessary, feedback requiring revision is provided on applications and reports through SBCTC's Online Grants Management System (OGMS), ensuring that remarks and corrections are transparently recorded and available to whomever may need to review them.

SBCTC's Finance division, with assistance from the capital budget staff who assist in facility accessibility monitoring, manages the MOA function by incorporating oversight and technical assistance into the agency's internal audit function. The use of SBCTC's internal audit function ensures all reviews are performed using a risk-based approach, as required by Governmental Auditing Standards, and that reviews meet the standards of objectivity, integrity, independence, and due professional care as provided by internal audit standards. The internal audit division relies on the assistance of the division's Lead Architect for accessibility reviews due to the positions regular and ongoing work at all state colleges and technical colleges.

# I. INTRODUCTORY INFORMATION

## Development of MOA Plan

### I. Which state agency was lead agency (responsible) for developing this MOA plan?

The state plan was developed in partnership between SBCTC and OSPI as the agencies with direct administration responsibility for the MOA and Perkins programs. In Washington, the Workforce Training and Education Coordinating Board (Workforce Board) has direct Perkins administrative authority and retains responsibility for the approval and submission of the state’s MOA plan.

### II. Which state agencies other than the lead agency participated in the development of the MOA plan?

Multiple staff from both SBCTC and OSPI were consulted in the development of the MOA plan. Additionally, Workforce Board members and staff were consulted in the development of the state plan. The Workforce Board is [comprised of members](#) representing government, business, and labor, and invited members with specialized representation. Due to this tripartite organization, multiple agency representatives have reviewed and provided feedback to the state’s MOA plan.

### III. Which advisory groups or stakeholders were involved and to what extent?

Date	Who	What
February, 2020	WFB, OSPI, SBCTC  Internal OSPI Meeting	Received Updated MOP from DOE/OCTAE/OCR  Office of Civil Rights, CTE, and Chief Legal Counsel meet to review DOE MOP and impact
March, 2020	OSPI, SBCTC	Staff discussion on impact of 2020 MOP and initial questions for clarity
April, 2020	OSPI, SBCTC	Staff discussion on questions for clarity for MOA conference and staff
May, 2020	WFB, OSPI, SBCTC  OSPI/SBCTC Staff (May 20, 2020)  Secondary CTE Update (May 8, 2020)	Staff attend MOA Conference + debrief as a state team to inform planning  Staff meet to engage in drafting discussions and planning  178 participants: Superintendents, CTE Directors, CTE Educators, and

	<p>External Secondary MOA Meeting (May 22, 2020)</p>	<p>Stakeholders briefed on MOA Update and Timeline</p> <p>Invited secondary administrators and educators that had been monitored the last three years to inform the state plan. Administrators from Toppenish, Renton, and Bethel School District, representing both comprehensive high schools and a skill center took part in this feedback.</p>
<p>June, 2020</p>	<p>External Secondary and Postsecondary MOA Meeting ( )</p> <p>External Secondary Stakeholder Feedback</p> <p>Updated prior to submission to OCR</p>	<p>-Perkins sub-committee, ONE/Tribal, Previously monitored MOA group, Posted to OSPI website</p>

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## II. PLAN FOR PERFORMING OVERSIGHT RESPONSIBILITIES

### State Plan Requirement

Collecting and analyzing civil rights related data and information that subrecipients compile for their own purposes or that are submitted to State and Federal officials under existing authorities (Section II(B)1 of the Guidelines)

### OSPI

Civil rights related data will be reported and reviewed by the Equity and Civil Right Office, the Career and Technical Education Department, and the Special Education Division at OSPI. Data will be reviewed primarily through the following methods:

- ✓ Review of district submitted [Annual Equity Assurance Report](#)
- ✓ Demographic data collected by OSPI from all school districts as part of regular business. The specific data that will support MOA will include two reports based on student-level data collected through the Comprehensive Education Data and Research System (CEDARS) i; (1) the district CTE participant list which will include students who have earned credit for any course with a CIP code for the reporting year, regardless of district or school. Individual course records will be used to create detailed lists for each student to allow school districts to see what CTE courses have been taken; (2) the CTE Concentrator Report which will be based on all students in the 4-year graduation cohort for the reporting year and the associated student grade history records, where term end date is within the school year and CIP code is not null for the reporting year and the prior 3 school years. This report will identify all students that have taken CTE courses in the past four years.
- ✓ These CEDARS generated reports will provide districts with disaggregated data across multiple demographics and special populations; enabling district to identify potential gaps in access and performance.
  - General enrollment data and enrollment statistics for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines
  - Rate of general enrollment in CTE programs and enrollment for members of special populations, as defined by Perkins V
  - Four-year and extended graduation rates for CTE participants and concentrators including members of special populations, as defined by Perkins V



- Academic proficiency in reading/language arts, mathematics, and science for CTE participants and concentrators including members of special populations, as defined by Perkins V
- Postsecondary placement for CTE participants and concentrators including members of special populations, as defined by Perkins V
- Non-traditional program enrollment for CTE participants and concentrators including members of special populations, as defined by Perkins V
- Program quality indicators including attainment of a recognized postsecondary credential, attainment of postsecondary credits, and participation in work based learning for CTE participants and concentrators including members of special populations, as defined by Perkins V
- ✓ Review of Perkins V application and annual report content
- ✓ Review of completed Comprehensive Local Needs Assessment (CLNA) including the student performance element
- ✓ Results of Consolidated Program Review (CPR) desk and on-site monitoring by staff from multiple departments within OSPI

Districts will review their data through annual CTE reports that will inform their CLNA development and amendment, as well as contribute to the state’s Consolidated Annual Report (CAR). The state office will also review data to inform funding priorities, technical assistance, and the development of training and resource materials.

## **SBCTC**

### **Civil Rights Data and Information**

Data and information to be used for identification of institutions for review will be gathered from various sources. The following is a list of the main methods to be used:

- ✓ Demographic data collected by SBCTC from all state colleges, as a regular part of business. The specific data used for the MOA review will include:
  - General enrollment data and enrollment statistics for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines
  - Rate of general enrollment in CTE programs and enrollment for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines

- Graduation/completion rates for the institution’s general population and for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines
- Graduation/completion rates for CTE programs for the general population and those for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines
- Attrition rates for the general student population and for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines
- Rate of attrition from CTE programs for the general student population and for individuals from protected groups, as defined by OCR, and special populations, as defined by Perkins V guidelines
- ✓ Publicly available community, state, and location demographic data
- ✓ Demographic data on the proportion of English learners in a college’s service area and languages spoken by these community members
- ✓ Physical observations during facility reviews performed as part of regular SBCTC business
- ✓ Available information on civil rights complaints and lawsuits from US Department of Education (DOE), Department of Justice (DOJ), Washington State Attorney General’s Office, and other Washington State agencies tasked with ensuring compliance with civil rights guidelines
- ✓ Public information and data available on the subrecipient website, including but not limited to, non-discrimination statements, course catalogs, handbooks, employment and financial aid forms, etc.
- ✓ Review of Perkins V application and annual report content
- ✓ Results of Perkins V monitoring activities
- ✓ Information gathered pursuant to a biannual request for information from postsecondary institutions. All postsecondary institutions will be asked to provide the following information on a biannual basis:
  - Information on the annual non-discrimination statement (i.e. a copy of the statement, method of distribution, date of publication, etc.)
  - Information on changes in key personnel such as civil rights coordinators and directors of key departments
  - Summary information pertaining to the number of civil rights grievances and the disposition of each case

- Information on significant changes in collective bargaining agreements; policies relating to civil rights, complaints, and grievances; appeal processes and procedures; CTE program requirements, apprenticeships, etc.

SBCTC will refine the risk assessment tool by adding and removing data, tools, and information used for the risk assessment to ensure a better overview of the institution's compliance with civil rights guidelines. Data and information used may also be adjusted if the quality of information is found to be unreliable, if new and better indicators of risk are discovered, or if it is found that the information/data is not a true indicator of risk.

### **Analyzing Data**

Civil rights data and information will be divided into groups corresponding with areas of civil rights oversight, and will be used to assess risk of non-compliance in each area. As an example, demographics showing low enrollment rates for students in protected and special populations, as compared to general enrollment, will be considered as an indication of possible risk in marketing, recruitment, admissions, and registration.

Each risk factor will be assigned a numerical score, with 0 indicating no risk detected. For each review section risk scores will be totaled and if the risk score indicates significant risk, the institution would receive either a desk review or a full review of that particular section.

For a complete overview of the risk assessment process, see [Appendix C: SBCTC Risk Assessment](#).

# State Plan Requirement

Conducting periodic compliance reviews of selected subrecipients (i.e., an investigation of a subrecipient to determine whether it engages in unlawful discrimination in any aspect of its program); upon finding unlawful discrimination, notifying the subrecipient of steps it must take to attain compliance and attempting to obtain voluntary compliance (Section II(B)2 of the Guidelines)

## OSPI

### Consolidated Program Review (CPR)

The Office of Superintendent of Public Instruction has a developed federal program monitoring cycle that is aligned with the Department of Education's direction of risk-based monitoring. This process fulfills OSPI's compliance monitoring requirements under Federal regulations (2 CFR 200). The Consolidated Program Review (CPR) process consists of a tiered monitoring system that includes the following types of reviews:

- Selected LEAs based on risk analysis (up to ten LEAs).
- Four largest LEAs (by federal fund allocations in programs reviewed).
- Educational Service District regional on-site or desk review cycle (ESDs 114 and 101 in 2019–20).
- Newly established LEAs such as charter schools and State-Tribal Compact schools.
- ESDs acting as LEAs for Title IV, Part A.

A risk assessment is used to identify the districts where additional attention is needed. The selected portion of the monitoring process concentrates on assessing student performance and program effectiveness data, and the level of internal management and controls at Washington LEAs. The review uses twelve performance data elements (consisting of 29 possible points total), updated annually, that may have a significant impact on a LEA's compliance with federal programs and receipt of federal funding. [The CPR Data Cell Description used for 2019-20 reviews may be found in Appendix D.](#)

The risk assessment included the following factors:

- LEA Size
- Office of System and School Improvement - Comprehensive or Targeted Support Identification
- Bilingual - EL Proficiency Rates, 5-year EL Transition Rate, and Dually Identified EL/SPED Rate (2017–18)
- Special Education - IDEA Determinations (2017–18)
- Career and Technical Education (CTE) - State Allocated Funds and Perkins Performance Improvement Plan (PPIP) Indicators
- Graduation Rate (2016–17 AND 2017–18)

- Fiscal - Federal Funds Allocated by Programs under CPR per FTE (2018–20 funds and 2018–19 FTE)
- Audit Finance and Grant Administration - Risk Audit Ranking (2018–19)
- Title I, Part A - Math and ELA Low Income 4th Grade SBAC Score (2017–18)

The information is computed, each district is grouped by enrollment, and then ranked by risk. An agency-wide team meets to review the LEAs risk score ranking, and sites are selected and informed by the team, which has CTE staff representation. In the appendices, the 2019-20 Consolidated Program Review (CPR) LEA Performance Data Column Descriptions are included.

Through the CPR process, the following programs are monitored:

1. Title I, A - Improving Academic Achievement
2. LAP (Learning Assistance Program)
3. Title I, C - Migrant Education
4. Title I, D - Neglected and Delinquent
5. Test Fee Reduction
6. Title II, A - Teacher and Principal Quality
7. Title III/TBIP (Transitional Bilingual Instructional Program)
8. Gun-Free Schools Act
9. Title V, B - Rural Education
10. Title IX - McKinney-Vento (Students Experiencing Homelessness)
11. Highly Capable
12. CTE/Perkins (Career and Technical Education)
13. Private Schools
14. Civil Rights
15. Fiscal Cross-Cutting
16. System and School Improvement
17. Foster Care
18. Title IV, A - Student Support and Academic Enrichment
19. Tribal Consultation

The periodic compliance reviews of the MOA requirements will primarily be conducted through the CPR process and on-site and desk reviews. The Program Monitor tool used to administer the CPR processes, will provide the documentation evidence for monitoring. Through this tool, exit reports will identify any areas that are out of compliance and will provide the communication tool for notifying monitored subrecipients of unlawful discrimination.

The state CTE office will reserve the right to consider CLNA information and information from the Equity and Civil Rights Office to provide addition technical assistance or monitoring if districts are identified as high risk, outside of the scheduled CPR process. This reservation does not assure that additional districts will be monitored outside of the CPR cycle, but rather provides the option for the state to make high-risk data-driven interventions.

The CTE office will develop and provide districts with resource documentation that provides an oversight of guidance related to all optional requirements of the MOA, specifically those that are not monitored through the CPR process. These resources will include self-assessment tools to support risk management.

### **Process and Procedures upon Findings**

OSPI will notify subrecipients through the Program Monitor tool of any determinations of noncompliance as a result of the CPR review. The Program Monitor tool provides an electronic-based form for staff to identify areas of noncompliance as well as requirements and/or steps necessary to achieve compliance. This tool exports a final exit report available to the subrecipient with identification of areas of noncompliance. Through this notification process, OSPI will be positioned to receive voluntary compliance through the receipt of an action plan submitted to address the determination, or documentation of the correction of the noncompliance; moving the subrecipient to “compliant” from “noncompliant” within the monitoring tool. Depending upon the determination, the CTE office may reach out to the Office of Civil Rights OPEN department for guidance or suggestions to support the subrecipient in achieving compliance. CTE staff will follow up with those reviewed to ensure corrections are made and that action plans are implemented. Failure to demonstrate voluntary compliance may result in additional OSPI monitoring and corrective actions, or potential termination of state funding. [An example of a district exit report can be found as Appendix E.](#)

## **SBCTC**

SBCTC will temporarily stop performing formal MOA reviews for a short period of time and will commence a technical training and assistance campaign during state fiscal years 2021 and 2022.

As part of this effort, all institutions that have not received a MOA review in the past five academic years (24 colleges), will be contacted and an informational/training session will be scheduled. The college will be encouraged to include all key stakeholders in the process. During the session, the following information will be provided:

- ✓ An overview of the MOA process;
- ✓ The laws and regulations applicable to the MOA process;
- ✓ How a MOA review is performed and what is reviewed;
- ✓ Washington State’s plan to ensure compliance in postsecondary institutions;
- ✓ An overview of compliance requirements and most common findings.

For training on physical accessibility, all colleges will be provided with an accessibility technical training session during this time period. As a regular part of business, SBCTC regularly performs facility condition surveys at colleges. During the 2021 calendar year, each college will have a scheduled visit by SBCTC staff to evaluate capital needs. As part of this site survey, accessibility

technical assistance will be provided to facility staff. SBCTC will also invite the college's administrative and business staff, as well as the college's disability coordinator and their staff, to participate in this review. A summary of assistance that will be provided during this technical assistance will include the following:

- ✓ Introduction to accessibility requirements: An overview of requirements will be provided as part of a facility condition survey kick off meeting
- ✓ Hands-on support: cursory review of easily-identifiable compliance issues identified during the campus facility condition survey
- ✓ Summary closure meeting: An opportunity to recap findings and provide additional technical assistance
- ✓ Office resource: The State Board will be available for technical assistance throughout the year for consultation

### **Process and Procedures for Reviews**

In June of 2022, after two years of technical assistance and training, SBCTC will begin the process of performing a biannual desk audit/risk assessment for each institution, and will start scheduling more detailed reviews at colleges showing additional risk in specific civil rights compliance areas.

Every other year, beginning in academic year 2023, SBCTC's MOA coordinator will perform a risk assessment of each college in the subrecipient universe, which will also serve as a desk audit. Based on the results of this assessment, one of the following actions below will be taken.

If a section shows low risk, based on numerical score, this low risk rating will be communicated to the institution via an annual letter. The letter will also summarize any minor violations and errors noted during the desk review, any recommendations for improvements, and any trends indicating possible future risk. If no areas of risk are noted, the institution will be notified that due to low risk, no further action will be required in the current academic year and will ask the college to correct minor issues during the upcoming academic year. The corrective actions will be reviewed in the following year and lack of correction by the college in a subsequent review will result in an increased risk in that section.

If the risk assessment indicates higher risk in a particular area, depending on the risk scores and the section, the institution may receive either a full desk audit of the area or a full on-site review of the section. Subsequent investigative steps for sections showing higher risk factors may include requesting more documentation from the college, more in depth review of records and information, surveys of community members, and possible interviews, as appropriate. The institution will be notified of the need for a more in-depth review of a particular area via the biannual letter, which will also summarize the risk factors that led to the higher risk score. The MOA coordinator will schedule and coordinate the review with appropriate college personnel during the upcoming academic year.

For accessibility reviews, SBCTC's Lead Architect will perform a review as part of a biannual facility condition review performed as a regular part of business. Any findings and issues found in these inspections will be communicated to the institution via a letter of finding and a request will be made for a corrective action. As in prior years, SBCTC staff will monitor the status of the corrective action and will document corrections.

Risk assessments will be refined continuously based on changes in requirements, lessons learned during the course of reviews and risk assessments, and availability of information to ensure they remain a useful tool for the purposes of detecting possible non-compliance and assisting institutions in identifying areas of risk and minor instances of non-compliance.

### **Notification Process**

On a biannual basis, each college will receive a desk review as part of a risk assessment. This review will result in a letter describing the results of the desk review and will be used as the initial tool to notify institutions of any requirement for a more details review of a particular section.

For institutions requiring further review, the administrative process will remain substantially unchanged from prior years, except for the scope of reviews, which will be narrowed to only those areas showing increased risk. Following the biannual letter, SBCTC's MOA coordinator will coordinate logistics for the upcoming engagement with a college liaison and will send an official letter to the college's president and/or chancellor confirming the date, the specific civil rights area(s) that will be examined, and details of the upcoming review. Attached to the letter will be a document providing the institution with a list of records and information needed, a list of parties that will interviewed, and further steps required by the college to prepare for the engagement (i.e. sending out surveys).

Once the review has been completed, a letter summarizing the results of the review will be sent to the president and/or chancellor. The process for reporting violations and findings will remain unchanged for areas showing moderate and significant risk. As in prior years, institutions will receive a LOF describing the violation, a recommendation for corrective action, and appropriate citations to support the finding. Along with the LOF, subrecipients will also receive a Voluntary Compliance Plan (VCP) and will be required to complete and submit the VCP to the MOA coordinator within 45 of days of receipt of the LOF. The VCP will require institutions to explain how the finding will be corrected, the date the corrective action will be complete, and information on the individual responsible for ensuring the corrective action is complete.

For accessibility reviews, SBCTC's Lead Architect will notify staff that the regularly scheduled facility condition review will also include a review for accessibility. At the end of the facility visit, if no instances of non-compliance are noted, results will be communicated to the college personnel during an exit interview. If instances of non-compliance and findings are noted, the college will be provided a Letter of Finding (LOF) in the same manner described above.



SBCTC’s MOA coordinator will continue to monitor all corrective actions and ensure all necessary steps have been taken to correct violations. Procedures for completion of the review will remain unchanged from prior years.

**Timing for MOA Procedures:**

Timing	Procedures
<b><i>Odd Numbered Years</i></b>	
May – June	Distribution of letters to all subrecipients of the upcoming desk review/risk assessment and request for information and records (i.e. annual non-discrimination notice, changes in coordinator, summary of Title IX and disability complaints and their disposition, etc.)
July – August	Performance of desk reviews and risk assessments
September	Distribution of bi-annual letters summarizing the results of desk reviews/risk assessments and informing subrecipients if action is required
October – April	Scheduling, performance, and reporting on reviews
<b><i>Even Numbered Years</i></b>	
December	Preparation and submission of Bi-Annual Report to OCR

# III. TECHNICAL ASSISTANCE FOR SUBRECIPIENTS

## State Plan Requirement

Providing technical assistance upon request to subrecipients. This includes assisting subrecipients identify unlawful discrimination and instructing them in remedies for and prevention of such discrimination (*Section II(B)3 of the Guidelines*)

## OSPI

Technical assistance will be provided to subrecipients to help prevent, identify, and remedy unlawful discrimination and improve access to CTE programs, services and activities.

The CTE office will develop and provide districts with resource documentation that provides an oversight of guidance related to all optional requirements of the MOA, specifically those that are not monitored through the CPR process. These will be posted on the CTE Resources/MOA website, i.e., as noted below:

- ✓ Self-Evaluation Facility Checklist
- ✓ Parallel Requirements of Construction Standards for Accessibility
- ✓ Accessibility Standards Timeline
- ✓ 1991 ADA Standards
- ✓ 2010 ADA Standards
- ✓ Methods of Administration Resource Documentation
- ✓ Sample Annual Nondiscrimination
- ✓ Notification Statement
- ✓ Items as Informed by CPR Process and Feedback/Request from Subrecipients

CTE office will collaborate with internal departments and link to their resource websites, i.e., as noted below:

- Equity and Civil Rights
- Special Education
- Migrant and Bilingual Education
- Native Education
- System and School Improvement
- Education for Homeless Youth and Children
- Foster Care

The CTE office will provide technical assistance to subrecipients via:

- ✓ Webinars
- ✓ Partnering with OSPI's Internal Departments to Provide Training

- ✓ Professional Development Training Conferences, i.e., Fall CPR, Fall WACTA, Spring WACTA, WA-ACTE Summer Conference

The CTE office will have MOA Office Hours scheduled as a means to offer technical assistance. Also, CTE and MOA questions can be submitted at [cte@k12.wa.us](mailto:cte@k12.wa.us)

The CTE office will use communication as a means of technical assistance, i.e.

- ✓ CTE Update Electronic Newsletter
- ✓ OSPI CTE External Zoom Meetings
- ✓ ESD Superintendents' Meeting Updates
- ✓ Surveys

The CTE office will promote the use of the United States Department of Education Office for Civil Rights and the Outreach, Prevention, Education and Non-Discrimination (OPEN) Center for further technical assistance.

- ✓ OCR, MOA Policy Guidance:  
<https://www2.ed.gov/about/offices/list/ocr/frontpage/fag/rr/policyguidance/moa.html>
- ✓ OCR, Civil Rights Data Collection (CRDC):  
<https://www2.ed.gov/about/offices/list/ocr/data.html?src=rt>
- ✓ OCR, FAQs:  
<https://www2.ed.gov/about/offices/list/ocr/faqs.html>
- ✓ OCR, Reading Room:  
<https://www2.ed.gov/about/offices/list/ocr/frontpage/fag/readingroom.html>
- ✓ Open Center: [OPEN@ed.gov](mailto:OPEN@ed.gov)

## **SBCTC**

Based on MOA reviews performed in the past 5 years, turn-over in key personnel, changes in guidelines and communications with subrecipients, SBCTC has found that a large number of institutions are not familiar with civil rights requirements and require training. In an effort to provide this training, to allow subrecipients to self-identify and correct areas of non-compliance internally, and to ensure institutions are aware of requirements reviewed by OCR, SBCTC will temporarily suspend all reviews, and will undertake a training and information sharing campaign.

To provide this training, SBCTC's MOA coordinators will contact 24 institutions in the next two fiscal years. This population will include all subrecipients that have not received a compliance review in the prior 5 years. Training will be provided in-person by the MOA coordinators to the extent possible to allow participants the opportunity to ask questions and engage in discussion. Colleges will be allowed and encouraged to invite any key personnel directly involved in ensuring compliance. At the conclusion of the training, the college president or chancellor will receive a letter confirming the training has occurred, including a summary of areas covered and the name

and contact information for the MOA coordinator for further questions or if assistance is needed. The letter will also serve to remind subrecipients that regular MOA reviews will resume in fiscal year 2023.

In addition to live training, SBCTC will create a webpage providing general civil rights information and resources. The webpage will clarify the role of the MOA coordinator, provide contact information for the MOA coordinators, and will invite institutions to submit questions via email. These questions will be tracked to determine if there are areas in which further training may be required. The webpage will also include a statement notifying readers that the MOA coordinator does not take individual civil rights complaints and that the purpose of the webpage is to ensure institutions, as a whole, are complying with the laws and have the systems and resources in place to ensure civil rights laws are followed. The page will include information on the parties and agencies available for individual complaints and grievances, including college coordinators, OCR, DOJ, and state agencies tasked with investigating civil rights complaints.

For accessibility issues, information on the web page will include basic requirements regarding accessibility compliance and contact phone numbers for technical assistance. The webpage will also include links to accessibility laws and standards.

In addition to the processes described above, SBCTC will continue the practice of sending occasional memorandums to all institutions, notifying them of upcoming deadlines, changes in the law and/or requirements, and other pertinent information. [For an example of a memorandum, see Appendix F.](#)

Staff will be available for technical reviews, on-site training, or other types of assistance as requested by subrecipients. SBCTC's civil rights webpage will include procedures required to request technical assistance.

As in the past, the MOA coordinator will rely heavily on OCR as a resource. OCR will be consulted to provide guidance with issues found during reviews, to assist in answering questions by subrecipients, and to provide overall guidance. In addition, SBCTC will rely on OCR to learn of changes in the laws, guidelines, and scope of MOA reviews. Finally, SBCTC will use the advice and guidance of OCR to continue the process of improving the risk assessment/desk audits, on-site reviews, reporting and technical assistance.

# IV. REPORTING TO THE DEPARTMENT

## Optional State Plan Requirement

Periodically reporting its activities and findings under the foregoing paragraphs, including findings of unlawful discrimination under paragraph 2, to the Office for Civil Rights.

### OSPI

OSPI will report to OCR through the established protocol set forth in the 2020 Memorandum of Procedures; submitting a civil rights compliance report to OCR and OCTAE as a narrative attachment in the State’s Consolidated Annual Report for Perkins V on the established biennial cycle for Washington. [The form in the Appendix G will be used to support the reporting requirement.](#)

The report will include:

- ✓ Identification of staff resources for MOA administration
- ✓ Description of compliance with Section II(A) of the *Guidelines*
- ✓ A list of subrecipients reviewed
- ✓ Copies of any findings or plans issues to subrecipients; and
- ✓ Description of technical assistance services

### SBCTC

SBCTC will continue reporting to OCR using the same format used in prior years for biannual reports and will submit reports by December 31 on even numbered years. Reports will be composed of the following sections:

#### Section 1 – Staff Resources

A summary of staff involved in all MOA related activity and the amount of effort expended on these duties will be provided in the following format:

<i>Staff Member</i>	<i>Position</i>	<i>% of Annual FTE Spent on MOA Activity</i>
<i>John Smith</i>	<i>CTE Policy Associate</i>	<i>5%</i>

#### Section 2 – Results of Prior Year Reviews

As shown below, a table will be provided listing all reviews from prior years that remain open. The table will include columns identifying the entity, the date of the review, the section(s) reviewed,

the number of open items, the date(s) the item(s) will be corrected, and, if applicable, the reason corrective action has been delays.

Institution	Year of Original Review	Section Reviewed	Item(s) Remaining Open	Date of Correction	Reason for Delay (If applicable)
<i>Institution A</i>	<i>2018</i>	<i>Recruitment</i>	<i>2</i>	<i>June 2021</i>	<i>COVID school closure</i>
<i>Institution B</i>	<i>2014</i>	<i>Financial Aid</i>	<i>1</i>	<i>March 2021</i>	

### Section 3 – A Summary of Monitoring Activity for the Prior Two Years

The section of the report will include a table listing each college in the postsecondary universe and the results of the annual risk assessments for each of the prior two years. The following is a sample of the format that will be used to convey this information:

AY 2020-21 Review Results							
Institution	Low Risk in All Areas (Issuance of Annual Letter Only)	Sections Indicating a need for further Review	Date of the Review	Number of Issues Found	Copy of Letter of Findings Issues	Copy of VCP	Current Status
Institution A	Yes	None	N/A	N/A	N/A	N/A	N/A
Institution B	No	Recruitment	October 2021	3	Attachment A	Attachment B	1 Item remaining Open
Institution B	No	Financial Aid	October 2021	1	Attachment A	Attachment B	Complete
Institution C	No	Counseling & Pre-vocation Activity	November 2012	1	Attachment C	Attachment D	Closed

### Section 4 – Summary of Technical Assistance Provided

The report will include the following data on technical assistance provided:

- ✓ Number of training sessions (live and virtual) provided
- ✓ Number questions received and answered through SBCTC website
- ✓ Number of memorandums distributed and information provided in memorandums
- ✓ Any other activity performed to assist subrecipients in compliance activities

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# Perkins V Comprehensive Local Needs Assessment (CLNA)

## Washington Template



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**





## What are the minimal requirements of the CLNA?

1. A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including:
  - strategies to overcome barriers that result in lower rates of access to, or performance gaps for, special populations;
  - providing programs that are designed to enable special populations to meet the local levels of performance; and
  - providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency. **(Element 1)**
2. An evaluation of student performance served by your district or college, based on state and locally determined levels of performance, including the evaluation of performance for special populations and subgroups. **(Element 2)**
3. A description of how offered CTE programs are:
  - Sufficient in size, scope and quality to meet the needs of all students served by your district or college; and
  - Aligned to state, regional, Tribal, or local in-demand industry sectors or occupations identified by the state or local workforce development board, including career pathways, where appropriate; or
  - Designed to meet other local education or economic needs identified through other sources. **(Element 3)**
4. An evaluation of progress toward the implementation of career and technical education programs and programs of study. **(Element 4)**
5. A description of how your district or college will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions. **(Element 5)**

### For Partnerships Conducting a CLNA

Eligible recipients can opt to complete an individual CLNA or partner with one or more local educational agencies (secondary and/or postsecondary) to conduct the CLNA. Keep in mind, however, that most data must be collected on each individual agency's programs to meet the Perkins V requirements for the CLNA. Partnerships must be established from the start of your CLNA process, with the partners participating together to inform the CLNA development.

### Perkins Leadership Team

Use the below template to identify the organizational leadership responsible for leading the CLNA process. This template should identify which Perkins recipient institutions (School District(s)/Skill Center(s)/Community and Technical College(s)) are involved with the completion of this template. This template should reflect the leadership team behind the CLNA, not the stakeholders consulted as part of the CLNA process.

Please add additional cells as needed.

Name	School District/Institution	Email/Contact Info	Role

## CLNA Stakeholders

Identify stakeholders involved in the evaluation of program data and completion of the CLNA. If an individual involved represents multiple roles, please identify both the primary and secondary role, if applicable. If “representative of a special population” or “other stakeholder” has been identified, please include the specific representation within the table below.

The Representative drop down includes representative of:

- **Basic Education for Adults/Title II WIOA**
- Economic Development/ADO
- Local Business and Industry Representative
- Local Workforce Development Area Representative
- Parent
- Postsecondary Administrator
- Postsecondary Career Counseling and Advising Professionals
- Postsecondary CTE Faculty
- Representatives of Indian Tribes and Tribal Organizations
- Representatives of Special Populations
- Secondary Administrator
- Secondary Career and Guidance Counselor
- Secondary Counselor
- Secondary CTE Administrator
- Secondary CTE Educator
- Secondary Instructional Support/Paraprofessionals
- Student
- Youth/Adult Corrections Education Representative
- Other Relevant Stakeholders

*For the purposes of “Other relevant stakeholders” please identify the appropriate representation.*

*For the purposes of special populations, representation may include gender, race/ethnicity, and/or members representing economically disadvantage, youth in, or aged out of, foster care system, students with disabilities, English learners, migrant students, Homeless students, or students with a parent in active military.*

Name	Organization	Email/Contact Info	Representative (Primary)	Representative (Secondary)
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.
			Choose an item.	Choose an item.

## Local Needs Assessment Element 1: Improving Equity and Access

Respond to the narrative prompt in consideration of the data collected from interviews, focus groups, or other methodologies. The response should identify strategies to overcome barriers that result in lower rates of access to, or performance gaps for, special populations and ways that programs are designed to enable special populations to meet the local levels of performance. Additionally, the responses should identify that activities are designed to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency for CTE students. The evidence or data source used to inform should be identified in the chart below.

**1.A** What is your equity-based approach for maximizing student potential to increase success in your CTE programs?

Current State	Desired State	Evidence/Data Source

**1.B** What is your approach to provide outreach to special and/or historically underserved populations?

Current State	Desired State	Evidence/Data Source

**1.C** What counseling or guidance resources do your college or district provide to ensure equitable access to both state and federal financial aid for special and underserved populations?

Current State	Desired State	Evidence/Data Source

**1.D** Describe your progress toward the implementation of equal access to high-quality career and technical education courses and programs of study for all students.

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Element 1: Improving Equity and Access	Action Plan for Improving Equity and Access
<p><b>Ratings:</b></p> <ol style="list-style-type: none"> <li>1 Significant gaps and/or multiple gaps exist</li> <li>2 Some gaps exist and/or we do not have a concrete plan to address them</li> <li>3 Very few gaps exist, and we have processes in place to close the remaining gaps</li> <li>4 No gaps exist</li> </ol> <p><b>Rating</b> (circle one)</p> <p style="text-align: center;"><b>1   2   3   4</b></p>	<p style="text-align: center;">Strategies in Priority Order:</p>          

## Local Needs Assessment Element 2: Evaluation of Student Performance

Respond to the narrative prompt in consideration of the data collected from interviews, focus groups, or other methodologies. The below questions will provide an evaluation of student performance served by your district or college, based on state and locally determined levels of performance, including the evaluation of performance for special populations and subgroups. The evidence or data source used to inform should be identified in the chart below.

**2.A** Where are the biggest gaps in Perkins Performance Indicators among CTE programs?

Current State	Desired State	Evidence/Data Source

**2.B** Where are the biggest gaps in Perkins Performance Indicators among student demographic subgroups?

Current State	Desired State	Evidence/Data Source

**2.C** Where are the biggest gaps in Perkins Performance Indicators among Perkins special populations?

Current State	Desired State	Evidence/Data Source

**2.D** In which CTE programs is the enrollment of one gender over 75% of the total program enrollment? Where there are program disparities in performance in either 4S1 or 3P1, what is being done to address them?

Current State	Desired State	Evidence/Data Source

**2.E** Which performance measurements were missed, if any, and what factors contributed to that performance outcome? \*

Current State	Desired State	Evidence/Data Source

<b>Element 2: Evaluation of Student Performance</b>	<b>Action Plan for Improving Equity and Access</b>
<p style="text-align: center;"><b>Ratings:</b></p> <ol style="list-style-type: none"> <li>1 Significant gaps and/or multiple gaps exist</li> <li>2 Some gaps exist and/or we do not have a concrete plan to address them</li> <li>3 Very few gaps exist, and we have processes in place to close the remaining gaps</li> <li>4 No gaps exist</li> </ol> <p style="text-align: center;"><b>Rating</b> (circle one)</p> <p style="text-align: center;"><b>1   2   3   4</b></p>	<p style="text-align: center;">Strategies in Priority Order:</p>

### Local Needs Assessment Element 3: Evaluation of CTE Programs: Alignment including Size, Scope & Quality

Respond to the narrative prompt in consideration of the data collected from interviews, focus groups, or other methodologies. The response below will identify how CTE programs are sufficient in size, scope, and quality; are aligned to state, regional, tribal, or local-in demand industry sectors, and are aligned to meet economic and labor needs. The evidence or data source used to inform should be identified in the chart below.

**3.A** Which of your programs are experiencing difficulty meeting the state approved secondary or postsecondary definitions of size, scope, and quality? Why?

Current State	Desired State	Evidence/Data Source

**3.B** Which programs do not yet incorporate current industry standard equipment, appropriate classroom and laboratory space, and/or quality instructional materials?

Current State	Desired State	Evidence/Data Source

**3.C** How does your district or college partner with stakeholders to ensure program alignment to workforce needs?

Current State	Desired State	Evidence/Data Source

**3.D** What strategies are in place to recruit and retain employers participating in work-based learning? What should be added?

Current State	Desired State	Evidence/Data Source

**3.E** How are you evaluating employer satisfaction with the learners they supervise and the quality of the work-based learning experiences? How are program outcomes met and/or reinforced by work-based learning activities?

Current State	Desired State	Evidence/Data Source

**3.F** Do you have adequate CTE program design? Adequate CTE design indicators include growing and sustainable enrollment, meaningful programs of study, articulation agreements, sequenced progression of courses within program area, meaningful credentials, and program evaluation.

Current State	Desired State	Evidence/Data Source

**3.G** Describe how your offered CTE Programs are sufficient size, scope, and quality to meet the demands of students served by your district or college, and are:

- Aligned to State, regional, Tribal, or local in-demand industry sectors or occupations; or

Element 3: Evaluation of CTE Programs	Action Plan for Improving CTE Programs
<p><b>Ratings:</b></p> <ol style="list-style-type: none"> <li>1 Significant gaps and/or multiple gaps exist</li> <li>2 Some gaps exist and/or we do not have a concrete plan to address them</li> <li>3 Very few gaps exist, and we have processes in place to close the remaining gaps</li> <li>4 No gaps exist</li> </ol>	<p>Strategies in Priority Order:</p>
<p><b>Rating</b> (circle one)</p> <p><b>1   2   3   4</b></p>	

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## Local Needs Assessment Element 4: Implementation of Programs and CTE Programs of Study

Respond to the narrative prompt in consideration of the data collected from interviews, focus groups, or other methodologies. The responses should identify progress toward the implementation of career and technical education programs and programs of study. The evidence or data source used to inform should be identified in the chart below.

**4.A** How do programs partner with secondary, postsecondary, adult basic education, local workforce development boards, and business/industry representatives to ensure programs of study are aligned to a postsecondary pathway?

Current State	Desired State	Evidence/Data Source

**4.B** How does your district/college ensure that CTE faculty and teachers are involved in the design and approval of programs of study and articulation agreements?

Current State	Desired State	Evidence/Data Source

**4.C** How do you ensure your programs of study are responsive to community employment needs, are informed by labor market information, and allow for employer input?

Current State	Desired State	Evidence/Data Source

**4.D** How do your programs of study lead to credentials of workplace value that provide all students opportunities for living wage employment, with an emphasis on the Perkins special populations and student subgroups?

Current State	Desired State	Evidence/Data Source

Element 4: Programs and CTE Programs of Study	Action Plan for Improving Programs and CTE Programs of Study
<p style="text-align: center;"><b>Ratings:</b></p> <ol style="list-style-type: none"> <li>1 Significant gaps and/or multiple gaps exist</li> <li>2 Some gaps exist and/or we do not have a concrete plan to address them</li> <li>3 Very few gaps exist, and we have processes in place to close the remaining gaps</li> <li>4 No gaps exist</li> </ol> <p style="text-align: center;"><b>Rating</b> (circle one)</p> <p style="text-align: center;"><b>1   2   3   4</b></p>	<p style="text-align: center;">Strategies in Priority Order:</p>

## Local Needs Assessment Element 5: Recruitment, Retention and Training of CTE Educators

Respond to the narrative prompt in consideration of the data collected from interviews, focus groups, or other methodologies. The responses will describe how your district or college will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions. The evidence or data source used to inform should be identified in the chart below.

**5.A** How do your staff and faculty demographics compare with your student demographics?

Current State	Desired State	Evidence/Data Source

**5.B** What processes are in place to recruit new CTE educators who reflect your student population?

Current State	Desired State	Evidence/Data Source

**5.C** What strategies are used to support the retention of high-quality CTE educators? For secondary programs, include the process to determine the extension of limited certification of CTE educators in your district.

Current State	Desired State	Evidence/Data Source

**5.D** What training and/or resources are available to your staff and faculty to ensure culturally responsive and inclusive programming?

Current State	Desired State	Evidence/Data Source

### Element 5: Recruitment, Retention and Training of CTE Educators

### Action Plan for Improving Recruitment, Retention and Training of CTE Educators

**Ratings:**

- 1 Significant gaps and/or multiple gaps exist
- 2 Some gaps exist and/or we do not have a concrete plan to address them
- 3 Very few gaps exist, and we have processes in place to close the remaining gaps
- 4 No gaps exist

Strategies in Priority Order:

**Rating** (circle one)

**1   2   3   4**



## Comprehensive Local Needs Assessment Summary

Summarize the information from each required element, identifying the priority work activity areas based upon the results of your CLNA. Once the priority areas are identified, please estimate the amount of funding used through Perkins V. The priority strategies may be duplicated from your CLNA before.

### Element 1: Improving Equity and Access

Rating	Priority Strategies	Estimated Funding Use (\$)

### Element 2: Evaluation of Student Performance

Rating	Priority Strategies	Estimated Funding Use (\$)

### Element 3: Evaluation of CTE Programs: Alignment including Size, Scope, & Quality

Rating	Priority Strategies	Estimated Funding Use (\$)

### Element 4: Implementation of Programs & CTE Programs of Study

Rating	Priority Strategies	Estimated Funding Use (\$)

### Element 5: Recruitment, Retention, and Training of CTE Educators

Rating	Priority Strategies	Estimated Funding Use (\$)

## Local Needs Assessment Required Stakeholder Verification

This form must be completed to verify the engagement of each of the required stakeholders. Please indicate the stakeholder engaged, the organization or company represented, and how the stakeholder was engaged in the Evidence of Engagement column. Evidence could be completing a survey, attending a meeting, focus group, etc.

Required Stakeholder	Name of Stakeholder	Organization/Company Representing	Evidence of Engagement
<b>1.</b> Representatives of career and technical education programs in a local educational agency or educational service agency, including teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals			
<b>2.</b> Representatives of career and technical education programs at postsecondary educational institutions, including faculty and administrators;			
<b>3.</b> Representatives of the State board or local workforce development boards and a range of local or regional businesses or industries;			
<b>4.</b> Parents and students			
<b>5.</b> Representatives of special populations including individuals with disabilities; individuals from economically disadvantaged families, including low-income youth and adults; individuals			

preparing for non- traditional fields; single parents, including single pregnant women; out- of-workforce individuals; English learners; homeless individuals: youth who are in, or have aged out of, the foster care system; youth with a parent who is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and is on active duty (as such term is defined in section 101(d)(1) of such title			
<b>6.</b> Representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at- risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965)			
<b>7.</b> Representatives of Indian Tribes and Tribal organizations in the State, where applicable			
<b>8.</b> Any other stakeholders that the eligible agency may require the eligible recipient to consult			

# APPENDIX B: 2019-20 CPR CHECKLISTS: CTE/PERKINS AND EQUITY AND CIVIL RIGHTS

## Career and Technical Education/Perkins

Item	Description	Evidence	Determination	Actions Required	Comments
12.1	<p><b>Assurances and Plan Approval</b>  <i>The LEA complies with the assurances for state and federal funds. State CTE RCWs, Perkins Act of 2006 (Perkins IV), and the Strengthening CTE for the 21<sup>st</sup> Century Act (Perkins V).</i></p>	<p><b>LEA Level:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A. Physical copy of signed and dated current year Perkins Assurances page.*</li> <li><input type="checkbox"/> B. Copy of minutes from School Board meeting in which Perkins Local Plan was approved.*</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Action Plan Approved</li> <li><input type="checkbox"/> Evidence Needed</li> <li><input type="checkbox"/> Noncompliant</li> <li><input type="checkbox"/> N/A</li> </ul>		
12.2	<p><b>State CTE Approval/Frameworks</b></p> <p><i>The LEA improves the academic and technical skills of students participating in career and technical education programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs to ensure a well-rounded education. (Perkins V – Sec. 134 (b)(4)) The LEA supports integration of academic skills into CTE programs and programs of study. (Perkins V- Sec. 135 (b)(3))</i></p> <p><i>The LEA will provide access to at least one CTE equivalency course. (CTE High School Course</i></p>	<p><b>LEA Level:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A. Copy of the current year course catalog(s) identifying CTE courses.</li> <li><input type="checkbox"/> B. List of all CTE courses offered by program area, with evidence of approval, and identification of any courses offered as state and/or local equivalencies identifying the type of academic credit offered. (Evidence may include course approval ID number, program approval signature page, etc.)</li> <li><input type="checkbox"/> C. Upload one approved and updated framework for each program area offered within the district – more may be requested as needed. Locally approved and updated frameworks must include all required components (including relevant Washington Academic Learning Standards, Industry Standards, and Leadership Standards), and demonstrate state approval through appropriate signature page.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Action Plan Approved</li> <li><input type="checkbox"/> Evidence Needed</li> <li><input type="checkbox"/> Noncompliant</li> <li><input type="checkbox"/> N/A</li> </ul>		

*equivalencies - RCW 28A.230.097)*

*The LEA will meet state approval requirements through course and program approval. (Career and Technical Education – Plans – Standards -RCW 28A.700.010)*

**12.3 Community and Educational Partnerships and Program Evaluation**

*The LEA ensures that parents, students, academic and CTE teachers, faculty, administrators, career guidance and academic counselors, representatives of business (including small business) and industry, labor organizations, parents and students, representatives of Indian Tribes and Tribal organizations, representatives of special populations (as defined in Perkins V), and other interested individuals are involved in the development, implementation, and evaluation of career and technical education programs. (Perkins V – Sec. 134 (d))*

*The LEA develops and implements evaluations of the activities carried out with funds. (Perkins V – Sec. 135 (b)(6)) The LEA evaluates annually, using the district's local adjusted levels of performance and CTE activities in its program. (RCW 28A.700.010) Educational agencies offering vocational*

**LEA Level:**

- A. Current year advisory committee meeting minutes. (General and/or program specific, depending upon LEA's CTE program offerings)
- B. Copy of approved minutes from previous meetings.
- C. Signed membership roster that reflects representatives from the program specific business, industry, and community agencies. (List must include member names, and specific stakeholder group they represent).
- D. Evidence of program evaluation for CTE program.

- Compliant
- Action Plan Approved
- Evidence Needed
- Noncompliant
- N/A

education programs – local advisory committees (RCW 28A.150.500)

#### 12.4 Special Populations

*The LEA will provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency; prepare students for non-traditional fields; provide equal access for special populations to CTE courses, programs, and programs of study; and ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations. (Perkins V – Sec. 134 (b)(5))*

*Special populations defined in Perkins IV/V include:*

- *Individuals with disabilities;*
- *Individuals from economically disadvantaged families, including low-income youth;*
- *Individuals preparing for non-traditional fields;*
- *English learners;*
- *Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act*
- *Youth who are in, or have aged out, of the foster care system; and*
- *Youth with a parent who is a member of the armed forces or is on active duty*

#### LEA and Building Level:

A. Copy of current year, class/course level CTE Enrollment report that must identify gender, race, and special population status. \*

B. Evidence of support offered to CTE students, examples of evidence include: tutorial services; language assistance; 504 plans; IEPs; or achievement evaluations for special population students (LEP, foster children, individuals preparing for non-traditional fields, see special pops. as described).

C. Evidence of how the district is addressing barriers to enrollment in CTE courses, for special populations. Evidence may include:\*

- Photographic evidence of modifications, ensuring ADA accommodations are met
- Documentation of availability of supportive personnel
- Instructional aids and devices
- Examples of modified curriculum (EL, SPED)
- Samples of targeted communication to students or families
- Copies of transition plans
- Samples of targeted career guidance
- Documentation of internship or work experience, or targeted professional development

Compliant

Action Plan

Approved

Evidence Needed

Noncompliant

N/A

(Perkins V – Sec. 3 (48))

*The LEA will incorporate strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations. (Perkins V – Sec. 134 (C) (2)(E)(i))*

**12.5 Professional Development/CTE Personnel**

*The LEA supports the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable state certification and licensure requirements, including individuals from groups underrepresented in the teaching profession. (Perkins V - Sec. 134 (b)(8))*

*The LEA provides professional development programs to teachers, faculty, administrators, specialized instructional support personnel, career guidance and academic counselors or paraprofessionals who are involved in integrated CTE programs and supports education programs for teachers of CTE in public schools and other public school personnel who are involved in the direct delivery of educational services to CTE students, to ensure that such teachers and personnel stay current with all aspects of an*

**LEA and Building Level**

- A. Evidence of LEA offered professional development opportunities for teachers, administrators, specialized instructional support personnel, career guidance and academic counselors or paraprofessionals.
- B. List of all staff involved in CTE programs professional development opportunities (list must include names of LEA staff, staff/teacher assignment(s), date(s) of the PD, and conference/workshop titles).
- C. Evidence that each instructor assigned to CTE course holds a current CTE certificate to teach the identified classes. (Evidence can include list of teacher/course CIP code/V-code/certification number)
- D. Proof of a written training plan for any conditionally certified instructor.

- Compliant
- Action Plan Approved
- Evidence Needed
- Noncompliant
- N/A

industry. (Perkins V - Sec. 135 (b)(2))

CTE courses must be taught by properly CTE certified instructors. Conditionally certified teachers must complete a written training plan developed in coordination with the CTE administrator and the CTE advisory committee (WAC 181-77-014)

**12.6 Leadership, Employability, and Extended Learning Opportunities**

*The LEA provides students with the skills necessary to pursue careers in high-skill, high-wage, or in demand industry sectors or occupations; (Perkins V- Sec. 135 (3)) which will include work-based learning opportunities, including simulated work environments. (Perkins V – Sec. 135 (b)(5)(E)) The LEA provides students with leadership skill development opportunities available at the local, state, national, and international level, accessed through extended learning opportunities, as defined as learning activities that extend beyond the scheduled school day and/or school year. (CTE state standards)*

*Time and resources will be allocated for the teachers/advisors to manage and supervise leadership activities (CTE state assurances)*

**LEA and Building Level**

- A. List of Career and Technical Student Organizations (CTSOs) and equivalency leadership programs available in the school, identified by course area/educator.
- B. For any CTSO: a copy of official membership rosters, official charter letter or paid invoice and/or a program of work. For any equivalent leadership program: the completed program of work on the required OSPI Equivalency Leadership Template.
- C. Documentation of work-based learning opportunities provided to students participating in CTE programs, and documentation that learning is extended into the community (e.g., Supervised Agricultural Experience (SAE) documentation, service learning activities, work-based learning, or cooperative worksite learning activities)
- D. Documentation that time is allowed for staff coordination of extended learning.

- Compliant
- Action Plan
- Approved
- Evidence Needed
- Noncompliant
- N/A

**12.7 Postsecondary Opportunities and Programs of Study**

**LEA and Building Level**

- A. One signed current year Program of Study Assurance Checklist form.\*

- Compliant
- Action Plan
- Approved



*The LEA develops a minimum of one program of study, with curriculum aligned to the requirements for a program of study (Perkins V – Sec. 135 (b)(5)(A). The LEA will provide students participating in CTE programs with the opportunity to gain postsecondary credit while attending high school. (Perkins V – Sec. 134 (b)(7))*

*The LEA will provide industry-recognized certification examinations or other assessments leading towards a recognized postsecondary credential. (Perkins V – Sec. 135 (b)(5)(F)*

*The LEA will demonstrate that all preparatory CTE courses offered by the district meet the requirements of RCW [28A.700.030](#). (RCW [28A.700.010](#))*

- B. Current year articulation agreements (signed articulation agreement must match the identified Program of Study in the LEAs Perkins Application).\*
- C. Evidence that the current course(s) within the Program of Study identified in the LEA's Perkins application have been approved by OSPi (e.g. the identified course approvals).\*
- D. List of available industry recognized certificate/credentials or dual credit opportunity by course area(s) currently offered, including evidence of opportunity. (Example: Earned certificate)

- Evidence Needed
- Noncompliant
- N/A

**12.8 Materials**

*Brochures and other printed materials paid for, in whole or in part, with Carl D. Perkins funds will carry a statement indicating the funding source. EDGAR 75.620*

**LEA and Building Level**

- A. If any materials were published with Perkins funds, evidence that the funding source is cited. \*

- Compliant
- Action Plan Approved
- Evidence Needed
- Noncompliant
- N/A

\*Denotes required evidence only of LEAs that applied and received Perkins funding in the last two years. All other required evidence will be reviewed regardless of LEAs application and allocation of Perkins.

# Civil Rights Equity and Civil Rights

LEA

Program Monitor

Date

For resources and sample materials for each item on the Civil Rights checklist, visit: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights>. CPR monitors a LEA’s implementation of critical requirements under state or federal law – it is not an audit or an investigation. A determination of “Compliant” indicates that the reviewer did not identify noncompliance issues related to the specific item number during the review. A “Compliant” determination does not guarantee that the LEA has complied with all requirements under state and federal law.

**Unless noted below (14.4 and 14.6), follow these directions for items requiring building-level evidence:**

- **For on-site reviews**, provide evidence from every building selected for review (see buildings identified in the CPR Review Scheduled letter).
- **For desk reviews**, submit evidence for two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable).
- 

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
14.1	<p><b>Compliance Coordinators</b>  <i>The LEA has designated at least one employee to coordinate and monitor the LEA’s compliance with its responsibilities under state nondiscrimination laws, Title IX, and Section 504.</i></p> <p><i>Each civil rights coordinator has received training regarding their responsibilities under these laws.</i></p> <p><b>Guide to Item 14.1:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.8; Section 504, 34 C.F.R.</p>	<p><b>LEA Level</b></p> <p><input type="checkbox"/> A. Name and title (e.g., superintendent, principal, HR director) for each of the following:</p> <ul style="list-style-type: none"> <li>• Civil Rights Coordinator</li> <li>• Title IX Officer</li> <li>• Section 504 Coordinator</li> </ul> <p><i>(Please also confirm that the LEA has updated the OSPI coordinator contact list: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators</a>)</i></p> <p><input type="checkbox"/> B. Evidence that the Civil Rights Coordinator, Title IX Officer, and Section 504 Coordinator have each obtained sufficient training to fulfill their respective responsibilities. Evidence should include training materials, certificates of attendance, agendas, or attestations of self-training (e.g., lists of materials reviewed on OSPI’s Equity and Civil Rights website, along with approximate dates of review).  <i>A sample self-training checklist is available at: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-">https://www.k12.wa.us/policy-funding/equity-and-civil-</a></i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p>Sec.104.7; Title II, 28 C.F.R.            Sec.35.107; RCW 28A.640.010 and            28A.642.010; WAC 392-190-020 and            392-190-060.</p>	<p><a href="#">rights/consolidated-program-review-civil-rights.</a></p> <p><b>Building Level</b>  <input type="checkbox"/> C. (On-Site Only) Building staff can identify the LEA’s Civil Rights Coordinator, Title IX Officer, and Section 504 Coordinator.</p>			
14.2	<p><b>Nondiscrimination Statement</b>  <i>The LEA provides continuous notice that it does not discriminate based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, creed, religion, age, veteran or military status, disability, or the use of a trained dog guide or service animal by a person with a disability.</i></p> <p><i>The nondiscrimination statement is included in all major LEA and building publications that are widely disseminated to students, parents, or employees.</i></p> <p><i>The LEA’s nondiscrimination statement includes the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Notice that the LEA does not discriminate based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, creed, religion, age, veteran or military status, disability, or the use of a trained dog guide or service animal by a person with a disability.</i></li> <li>• <i>Notice that the LEA provides equal access to the Boy Scouts and other designated youth groups.</i></li> <li>• <i>Contact information for each compliance coordinator (including their name or title,</i></li> </ul>	<p><b>LEA or Building Level</b>            For each of the following publications, please provide a URL or indicate the page number where a complete, current nondiscrimination statement is located:</p> <p><input type="checkbox"/> A. Website.  <input type="checkbox"/> B. Newsletter or a similar publication.  <input type="checkbox"/> C. Student/parent handbook or a similar publication.  <input type="checkbox"/> D. Job announcement or employment application.  <input type="checkbox"/> E. CTE publication, announcement, or student recruitment materials. <i>Please indicate if the district does not have a CTE program.</i>  <input type="checkbox"/> F. Online or ALE program publication, announcement, or recruitment materials. <i>Please indicate if the district does not have an online or ALE program.</i></p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p><i>mailing address, email address, and phone number).</i></p> <p><b>Guide to Item 14.2:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.6; Title IX, 34 C.F.R. Sec.106.9; Section 504, 34 C.F.R. Sec.104.8; Title II, 28 C.F.R. Sec.35.106; Boy Scouts Act, 34 C.F.R. Sec.108.6; RCW 28A.640.010 and 28A.642.010; WAC 392-190-060.</p>				
14.3	<p><b>Complaint Procedures: Discrimination and Sexual Harassment</b></p> <p><i>The LEA has adopted discrimination complaint and appeal procedures and a sexual harassment policy and procedure that are consistent with the requirements in state law (chapter 392-190 WAC, revised December 2014).</i></p> <p><i>The LEA annually notifies all students, parents, and employees about the discrimination complaint procedure and sexual harassment policy in student and employee handbooks. LEAs that do not provide student or employee handbooks otherwise provide this information—in writing—to all students, parents, and employees.</i></p> <p><i>The LEA posts either the OSPI sexual harassment poster or the LEA’s sexual harassment policy in each school building in a location visible</i></p>	<p><b>LEA Level Policies and Procedures</b></p> <p><input type="checkbox"/> A. LEA’s student nondiscrimination policy and procedure (WSSDA’s 3210 and 3210P, or equivalents).</p> <p><input type="checkbox"/> B. LEA’s employee nondiscrimination policy and procedure (WSSDA’s 5010 and 5010P, or equivalents).</p> <p><input type="checkbox"/> C. LEA’s student sexual harassment policy and procedure (WSSDA’s 3205 and 3205P, or equivalents).</p> <p><input type="checkbox"/> D. LEA’s employee sexual harassment policy and procedure (WSSDA’s 5011 and 5011P, or equivalents).</p> <p><b>Building Level Notification</b></p> <p><i>For 14.2.E and 14.2.F, upload only the relevant pages or indicate the page numbers where information about both the LEA’s sexual harassment policy and discrimination complaint procedures are located.</i></p> <p><input type="checkbox"/> E. Student handbook or similar publication.</p> <p><input type="checkbox"/> F. Employee handbook or similar publication.</p> <p><input type="checkbox"/> G. Evidence that the LEA has posted the OSPI Sexual Harassment Poster or the LEA’s sexual harassment policy in a location visible to both students and staff. Evidence should include photos of postings (please indicate location of poster), a signed assurance from Superintendent or designee assuring posting, or visual inspection by OSPI staff for on-site reviews.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p>to both students and staff.</p> <p>The LEA has provided training to all administrators and certificated and classroom personnel regarding their responsibilities under civil rights laws and to raise awareness of and eliminate bias based on sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression, gender identity, disability, and the use of a trained dog guide or service animal.</p> <p><b>Guide to Item 14.3:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.8; Section 504, 34 C.F.R. Sec.104.7; Title II, 28 C.F.R. Sec.35.107; RCW 28A.640.010, 28A.640.020, and 28A.642.010; WAC 392-190-056, WAC 392-190-057, WAC 392-190-058, WAC 392-190-060, 392-190-065, 392-190-070, and 392-190-075.</p>	<p><b>Employee Training</b></p> <p><input type="checkbox"/> H. Evidence that all administrators and certificated and classroom personnel have received training on their responsibilities under state civil rights laws. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. Training materials or a summary of topics included in the training, including at a minimum the following: (a) protected classes under Washington state law, (b) employee responsibilities to report and respond to discrimination, and (c) the LEA's discrimination complaint procedures.</li> <li>2. Sign-in sheets documenting attendance or other attestation that all administrators and certificated and classroom personnel have received the training.</li> </ol>			
14.4	<p><b>Section 504</b></p> <p>The LEA provides parents with prior written notice, including notice of procedural safeguards, when the LEA takes any action to identify, evaluate, and place students under Section 504.</p> <p>The LEA identifies, evaluates, and places students with disabilities in compliance with Section 504 and has implemented the legal</p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. The LEA's notice to parents of Section 504 rights/procedural safeguards.</p> <p><input type="checkbox"/> B. Evidence that the LEA conducts manifestation determinations when required for Section 504-eligible students. Evidence must include a description of the LEA's manifestation determination process and any manifestation determination form the LEA uses.</p> <p><b>Building Level</b></p> <p><input type="checkbox"/> C. Section 504 plan documentation, including the following:</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p><i>standards under the ADA Amendments Act of 2008 (such as changes regarding major life activities, mitigating measures, etc.).</i></p> <p><i>The LEA receives parental consent before all initial evaluations and initial placements under Section 504.</i></p> <p><i>The LEA ensures that evaluation and placement decisions are made by a group of persons, including persons who are knowledgeable about the student, the meaning of the evaluation data, and placement options.</i></p> <p><i>The LEA provides all necessary accommodations, related aids, and services for students with disabilities, including students with health conditions who may also be served by a health plan.</i></p> <p><i>The LEA conducts manifestation determinations before removing a student with a disability from their current placement because of a behavioral violation.</i></p> <p><b>Guide to Item 14.4:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Section 504, 34 C.F.R. Part 104; RCW 28A.642.010.</p>	<ol style="list-style-type: none"> <li>1. Parent consent for initial evaluation.</li> <li>2. Evaluation documentation.</li> <li>3. Parent consent for initial placement.</li> <li>4. Section 504 plans.</li> <li>5. Evidence of manifestation determination meetings (if applicable).</li> </ol> <ul style="list-style-type: none"> <li>• <i>For on-site reviews</i>, the CPR monitor will review student files on site.</li> <li>• <i>For desk reviews</i>, upload documentation for two students at an elementary school, middle/junior high school, high school, online or ALE program, and alternative school (where applicable). Uploaded documentation must include at least one student with a health condition (e.g., diabetes, allergies, etc.).</li> </ul>			

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
14.5	<p><b>Interpretation and Translation Services</b></p> <p><i>The LEA communicates with all limited-English proficient parents (LEP) in a language they can understand, which includes providing qualified and competent adult interpreters to communicate with LEP parents and translating vital documents when a significant percentage of the population in a school or LEA needs the information in a language other than English.</i></p> <p><i>If there is a small number of parents with particular language needs, or if a school or LEA is unable to translate a document because of undue expense, the LEA still otherwise provides the information to parents in a language they can understand (i.e., through oral interpretation).</i></p> <p><i>The LEA ensures that interpreters and translators have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue and are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.</i></p> <p><b>Guide to Item 14.5:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p>	<p><b>LEA Level</b>  <b>All LEAs</b></p> <p><i>Submit this item even if the LEA has not identified any limited-English proficient (LEP) parents.</i></p> <p><input type="checkbox"/> A. Evidence or a description of the process the LEA uses to identify LEP parents, including a home language survey or questions about home language on a student enrollment form.</p> <p><b>LEA and Building Level</b>  <b>LEAs with One or More LEP Parent</b></p> <p><i>If an LEA has identified LEP parents, the LEA must provide the following:</i></p> <p><input type="checkbox"/> B. A description of the process the LEA uses to ensure that interpretation and translation services are provided to communicate vital information with LEP parents, including at least the following:</p> <ol style="list-style-type: none"> <li>1. How the LEA determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided).</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated).</li> <li>3. How the LEA determines which language(s) to translate documents into.</li> <li>4. How the LEA ensures its staff know how to access interpreters or translators to communicate with LEP parents.</li> </ol> <p><input type="checkbox"/> C. A description of the process the LEA uses to ensure that interpreters and translators, including LEA or school employees who perform this role, are qualified and competent to serve in the role of an interpreter or to translate documents.</p> <p><input type="checkbox"/> D. N/A – The LEA has not identified any LEP families (applies to B and C).</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; Lau v. Nichols, 414 U.S. 563 (1974); RCW 28A.642.010.</p>				
14.6	<p><b>English Language Development Services</b></p> <p>The LEA provides English language development (ELD) services to English Learners (EL) – national origin minority students with limited-English proficiency.</p> <p>The LEA has a process to identify, assess, and place EL students, which includes a home language survey and provisions for testing students on the state language proficiency assessment.</p> <p>The LEA’s ELD services are based on a sound educational theory and have been implemented effectively, including qualified staff and adequate resources and facilities.</p> <p>The LEA evaluates the program’s effectiveness and makes modifications as needed.</p> <p><b>Guide to Item 14.6:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; Lau v. Nichols, 414 U.S. 563 (1974); Castañeda v. Pickard, 648 F.2d 989 (5th Cir. 1981); Chapter 28A.642 RCW and 392-190 WAC.</p>	<p><b>LEA or Building Level</b></p> <p>For LEAs that receive Title III or TBIP funding, OSPI reviews this documentation under Title III/TBIP (CPR Checklist 7) – no additional documentation is required for this item.</p> <p>All LEAs that do not receive Title III or TBIP funding must complete the following items:</p> <p><input type="checkbox"/> A. Evidence that the LEA identifies the language background of each student upon enrollment (including the first language learned, the language the student uses most often, and the language used in the home). Evidence should include a home language survey or student enrollment form with the required questions.</p> <p><input type="checkbox"/> B. Assessment and placement procedures for ELD services, including testing on the state language proficiency assessment and criteria for determining eligibility and exit.</p> <p><input type="checkbox"/> C. A roster of eligible EL students, indicating language proficiency level and the type and amount of ELD services provided for each student.</p> <p>If LEA has identified EL students, respond to D, E, F, and G.</p> <p><input type="checkbox"/> D. A list of all teachers who design, oversee, and evaluate ELD services. For each teacher listed, provide their qualifications to provide EL services, such as EL/ESL endorsement or ongoing training relating to the delivery of ELD services.</p> <p><input type="checkbox"/> E. A list of all paraeducators who assist in providing ELD services. For each paraeducator listed, provide evidence that they instruct under the direct supervision of a qualified teacher and receive ongoing training relating to the delivery of ELD services.</p> <p><input type="checkbox"/> F. Student files with completed home language survey, placement test, and annual language proficiency assessment score sheets.</p> <ul style="list-style-type: none"> <li>For on-site reviews, upload documentation from two students at each of the buildings selected for review and any ALE or online program, where applicable.</li> </ul>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A <input type="checkbox"/> N/A - Limited		



Item	Description	Evidence to Submit	Determination	Actions Required	Comments
14.7	<p><b>National Origin and Immigration Status (Student Enrollment and Registration)</b></p> <p><i>The LEA does not discourage or prevent a student from enrolling because they lack a birth certificate or have records indicating a foreign place of birth. The LEA accepts a variety of documents to establish a student's age and residency.</i></p> <p><i>The LEA does not inquire about a student's or parent's U.S. citizenship status or immigration status. If the LEA requests a student's or parent's social security number, the LEA (1) informs the individual that disclosure is voluntary, (2) provides the statutory or other legal basis for why the LEA is requesting the number, and (3) explains how the LEA will use the number.</i></p> <p><b>Guide to Item 14.7:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; RCW 28A.642.010; Plyler</p>	<ul style="list-style-type: none"> <li>• For <i>desk reviews</i>, upload documentation from two students at an elementary school, middle/junior high school, high school, ALE or online program, and alternative school, where applicable.</li> <li><input type="checkbox"/> G. Evidence of evaluation of the effectiveness of the LEA's ELD services (e.g., progress made in language acquisition and academic achievement, feedback from teachers and parents, meeting minutes, etc.).</li> <li><input type="checkbox"/> H. N/A – The LEA has not identified any EL students (applies to C, D, E, F, and G). <i>Please Add Comment to this item stating grounds for N/A.</i></li> </ul> <p><b>LEA and Building Level</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A. All LEA and building-level student enrollment forms and packets (including cover sheets), and any new student registration information, whether available in hardcopy or online format, in English and any translated versions the LEA uses.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Action Plan Approved</li> <li><input type="checkbox"/> Evidence Needed</li> <li><input type="checkbox"/> Noncompliant</li> <li><input type="checkbox"/> N/A</li> <li><input type="checkbox"/> N/A - Limited</li> </ul>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
14.8	<p><i>v. Doe, 457 U.S. 202 (1982).</i></p> <p><b>Course and Program Enrollment</b>  <i>To ensure the LEA does not discriminate in the counseling and guidance of students, the LEA at least annually reviews disaggregated course and program enrollment data to identify disproportionalities based on sex, race, EL status, and disability (special education and Section 504).</i></p> <p><i>The review should include honors and advanced placement courses, career and technical education, highly capable programs, online programs, specialized programs, etc.</i></p> <p><i>If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination.</i></p> <p><b>Guide to Item 14.8:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.36; Section 504, 34 C.F.R. Sec.104.34; Title VI, 34 C.F.R. Sec.100.3; RCW 28A.640.020 and 28A.642.010; WAC 392-190-010.</p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. A description of the process the LEA uses to annually review disaggregated course and program enrollment data at each building to identify and address disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must specify the following:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. Which course and programs are reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p><b>Building Level</b></p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. Course and program enrollment data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol> <p><input type="checkbox"/> C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling).</li> </ol> <p><input type="checkbox"/> D. N/A – No disproportionalities were identified (applies to C). <i>Please Add Comment to this item stating grounds for N/A. CPR monitors may cross-reference with OSPI course enrollment data.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A <input type="checkbox"/> N/A - Limited		
14.9	<b>Student Discipline</b>	<b>LEA or Building Level</b>	<input type="checkbox"/> Compliant		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p><i>To ensure the LEA does not discriminate in the administration of student discipline, the LEA at least annually reviews disaggregated discipline data to identify disproportionalities based on sex, race, EL-status, and disability (special education and Section 504).</i></p> <p><i>At a minimum, the review should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions.</i></p> <p><i>If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination.</i></p> <p><b>Guide to Item 14.9:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 35 C.F.R. Sec.100.3; Section 504, 34 C.F.R. Sec.104.4; Title IX; 34 C.F.R. Sec.106.31; RCW 28A.640.010; RCW 28A.642.010; and WAC 392-190-048.</p>	<p><input type="checkbox"/> A. A description of the process the LEA uses to annually review disaggregated student discipline data at each building to identify and address disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must specify the following:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. What data is reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p><b>Building Level</b></p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. Student discipline data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of identified disproportionalities.</li> </ol> <p><input type="checkbox"/> C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e.</i>, root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</li> </ol> <p><input type="checkbox"/> D. N/A – No disproportionalities were identified (applies to C). <i>Please Add Comment to this item stating grounds for N/A. CPR monitors may cross-reference with OSPI student discipline data.</i></p>	<p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		
14.10	<b>Accommodating Student Interests and Abilities (Three-Part Test)</b>	<b>Building Level</b>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p><i>Each building that offers an interscholastic athletic program equally accommodates the interests and abilities of male and female students as demonstrated in one of the following ways (“Three-Part Test”):</i></p> <ol style="list-style-type: none"> <li><i>1. The ratio of male/female student enrollment is substantially proportionate to the ratio of male/female athletic participation,</i></li> <li><i>2. The school has a history and continuing pattern of program expansion for the underrepresented sex, or</i></li> <li><i>3. The school’s current program fully and effectively accommodates the interests and abilities of the underrepresented sex as demonstrated by the athletic interest survey and other requests for specific sports.</i></li> </ol> <p><i>The LEA administers the OSPI student athletic interest survey at least once every three years at each building that offers interscholastic athletics.</i></p> <p><i>The LEA disaggregates and summarizes its survey results by sex and by building and considers these results when planning and developing which recreational and athletic activities to offer and when determining whether equal opportunities are available to members of both sexes.</i></p> <p><b>Guide to Item 14.10:</b>  <a href="https://www.k12.wa.us/policy-">https://www.k12.wa.us/policy-</a></p>	<p><i>If your LEA operates, sponsors, or provides interscholastic athletics, submit the following items.</i></p> <p><input type="checkbox"/> A. A complete copy of the student athletic interest survey instrument, and date it was last administered.</p> <p><input type="checkbox"/> B. Survey results for each building, with student responses <i>disaggregated by sex</i> (use the sample summary worksheet or equivalent), including at a minimum:</p> <ol style="list-style-type: none"> <li>1. The number of students surveyed.</li> <li>2. The number of students enrolled (i.e., eligible to take the survey).</li> <li>3. The top five sports requested, including the number of students who expressed interest in each sport.</li> <li>4. The top reasons for non-participation.</li> </ol> <p><i>Download the sample summary worksheet here:</i>  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx</a>.</p> <p><input type="checkbox"/> C. A completed Three-Part Test analysis for each building, using the OSPI’s Athletic Opportunities Tool.</p> <p><i>Download the tool and instructions here:</i>  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip</a>.</p> <p><input type="checkbox"/> D. N/A – The LEA does not operate, sponsor, or provide interscholastic athletics. <i>Please Add Comment to this item stating grounds for N/A.</i></p>	<p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
	<p><a href="#"><u>funding/equity-and-civil-rights/consolidated-program-review-civil-rights</u></a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.41; RCW 28A.640.020; WAC 392-190-030, 392-190-035, 392-190-040, and 392-190-045.</p>				
14.11	<p><b>Annual Athletic Evaluation</b></p> <p><i>The LEA provides equal opportunities and benefits for male and female students to participate in athletics. Each building that offers an athletic program conducts an annual evaluation of its athletic program to ensure that the overall benefits and treatment of the boys' and girls' athletic programs are comparable, considering the following factors:</i></p> <ul style="list-style-type: none"> <li>• Accommodation of interests and abilities (already addressed via Item 14.10)</li> <li>• Coaching and tutoring</li> <li>• Equipment and supplies</li> <li>• Scheduling</li> <li>• Facilities</li> <li>• Medical services and training</li> <li>• Publicity and awards</li> <li>• Travel and per diem</li> </ul> <p><i>The LEA has a process in place to ensure that outside sources of athletics funding (i.e., fundraisers, donations, or booster club activities) do not result in disparities in benefits or treatment between the girls' and boys' programs.</i></p> <p><i>If fundraising or donations result in a disparity along gender lines, the LEA corrects the disparity, using its</i></p>	<p><b>LEA or Building Level</b></p> <p><i>If your LEA operates, sponsors, or provides interscholastic, club, or intramural athletics, submit the following items.</i></p> <p><input type="checkbox"/> A. A description of the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.</p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include dated and completed building-level worksheets and analysis, or equivalent.</p> <p><input type="checkbox"/> C. If the athletic evaluation for the 2018–19 or 2019–20 school year identified disparities that favor one sex at any building, evidence that the LEA or building is taking effective steps to correct the disparity. <i>If no disparities were identified, please Add Comment to this item stating grounds for N/A.</i></p> <p><input type="checkbox"/> D. A description of the LEA's process to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another.</p> <p><input type="checkbox"/> D. E. N/A – The LEA does not operate, sponsor, or provide interscholastic athletics. <i>Please Add Comment to this item stating grounds for N/A.</i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>		

Item	Description	Evidence to Submit	Determination	Actions Required	Comments
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*own funds if needed.*

**Guide to Item 14.11:**  
<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights>

**Legal authority:** Title IX, 34 C.F.R. Sec.106.41; RCW 28A.640.020; WAC 392-190-030, 392-190-035, 392-190-040, and 392-190-045.

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# APPENDIX C: SBCTC MOA RISK ASSESSMENT TOOL

Below are the first three pages of the MOA Risk Assessment Tool. The full tool is available by emailing [mjacobs@sbctc.edu](mailto:mjacobs@sbctc.edu).

## SBCTC MOA Risk Assessment Tool

SECTION ONE - ADMINISTRATIVE REQUIREMENTS							
Review Step	Method of Review	Point Distribution Method	Not Applicable	Full Compliance (0 Points)	Partial Compliance (5)	Non-Compliance (10 points)	Total Points
<i>General</i>							
Has the college corrected minor issues and non-compliance noted in prior year review?	Results of prior year review	5 points for partial corrections, 10 for no corrections					
Do the results of the Perkins V review indicate additional risk in this area?	Perkins V Review	5 for minor/small risk and 10 for significant risk					
<i>Non-Discrimination Notice</i>							
Is non-discrimination statement easily accessible from main webpage?	Website Review	5 points for not easily accessible, 10 points for no non-discrimination statement					
Is non-discrimination statement complete?	Website Review	5 points for each missing component (10 max)					
Is the statement on the following documents: student handbook, employee handbook, job announcements, course catalog, etc.	Website Review	5 points for one missing statement, 10 for more than one (10 max)					
<i>Title IX and 504 Coordinators</i>							
Has there been a change in coordinators from prior year?	Website Review	5 points for each coordinator change					
Does the website and non-discrimination notices include all required information pertaining to coordinators? (Name, address, phone number and email for Title IX)	Website Review	5 points for each missing component (10 max)					

**SBCTC**  
**MOA Risk Assessment Tool**

Review Step	Method of Review	Point Distribution Method	Not Applicable	Full Compliance (0 Points)	Partial Compliance (5)	Non-Compliance (10 points)	Total Points
Are sources of training for Title IX posted on college website as required?	Website Review	10 points for not having information posted					
Did the college post a non-discrimination notice prior to the beginning of the academic year in a place accessible to the college and general community?	Documentation request from college	5 points if not distributed before academic year, 10 for not distributing it					
Did the annual non-discrimination notice include all required elements? (i.e. a summary of programs, admission policy, language regarding English learners, etc.)	Documentation request from college	5 points for each missing component (10 max)					
Was the non-discrimination notice available in languages spoken in the college's community?	Documentation request from college	5 points if not in all languages in service area, 10 for no languages					
<b>Grievance Policy</b>							
Is the college's grievance policy posted on line?	Website Review	10 points for not having information posted					
Does the grievance policy include all elements required by Title IX?	Website Review	5 points for each missing component (10 max)					

<b>Total Possible Points</b>	<b>130 Points</b>
<b>&gt;65 - Minor errors will be included in annual letter. No further action</b>	
<b>66-100 - Training</b>	
<b>101-130 - Full desk review and training</b>	



**SBCTC  
MOA Risk Assessment Tool**

<b>SECTION TWO - SITE LOCATION &amp; STUDENT ELIGIBILITY</b>								
<b>Review Step</b>	<b>Method of Review</b>	<b>Point Distribution Method</b>	<b>Not Applicable</b>	<b>Full Compliance (0 Points)</b>	<b>Partial Compliance (5)</b>	<b>Non-Compliance (10 points)</b>	<b>Total Points</b>	
<i>General</i>								
Has the college corrected minor issues and non-compliance noted in prior year review?	Results of prior year review	5 points for partial corrections, 10 for no corrections						
Do the results of the Perkins V review indicate additional risk in this area?	Perkins V Review	5 for minor/small risk and 10 for significant risk						
<i>Student Eligibility</i>								
Is student eligibility always determined by the college? (if yes, go to next session - Washington state law requires open enrollment for all state colleges)	Annual Information Request	0 if determined by college, 10 if determined by an outside group.						
If student eligibility for some individuals is determined by an outside group or organization for a CTE program, is the selection criteria free of discrimination and/or bias or appearance thereof?	Annual Information Request	5 if agreement with no non-discrimination statement, 10 for no agreement						
If student eligibility for some individuals is determined by an outside group or organization for a CTE program, is the rate of acceptance of individuals from protected and Special population the same as the general population?	SBCTC Data Collection and Annual Request for Information	5 points for up to 10% variance, 10 points for a variance over 10%						

# APPENDIX D: CPR DATA CELL DESCRIPTION 2019-20

## Consolidated Program Review (CPR) LEA Performance Data Column Descriptions

Column	Code	Description of Cell	Raw Data / Score Calculation	Data Year	Data Source	Available
D	LEA Size	<p><b>LEA Size</b> LEAs are grouped/scored as large (3), medium (2), and small (1) based on student count.</p>	<p><i>Raw Data:</i> In the form of student count by LEA. <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with a pop. Above 5000 received a score of 3.</li> <li>• LEAs with a pop. Between 1500 and 5000 received a score of 2.</li> <li>• LEAs with a pop. Below 1500 received a score of 1.</li> </ul>	2017–18	OSPI Report Card or Data Portal	June
H	Comprehensive/ Targeted	<p><b>Comprehensive Schools</b> Schools identified for support as the lowest-performing five percent of Title I schools, based on achievement on the statewide assessments. Comprehensive schools include high schools that have a consistent graduation rate of less than two-thirds of their students.</p> <p><b>Targeted Schools</b> Schools identified for support as the lowest-performing ten percent of Title I schools, based on achievement on the statewide assessments. Targeted schools include schools identified due to performance of three or more student groups and those identified for English Learner</p>	<p><i>Raw data:</i> List of Comprehensive and Targeted Schools provided by the Office of System and School Improvement. <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with more than 75% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 4.</li> <li>• LEAs with more than 50% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 3.</li> <li>• LEAs with more than 25% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 2.</li> </ul>	2018–19	OSSI	June

		<i>progress.</i>	<ul style="list-style-type: none"> <li>• LEAs with more than 0% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 1.</li> <li>• LEAs with NO schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 0.</li> </ul>			
I	EL Proficiency	<p><b>English Language Proficiency Assessment (ELPA) 21</b>  <i>The ELPA21 summative assessment measures students' English language proficiency, both knowledge and skills, in reading, listening, writing, and speaking. This is an assessment given to all students who qualify for English language development (ELD) services with a placement test. Results from this test determine which students are eligible to continue receiving ELD services.</i></p>	<p><i>Raw data:</i> In the form of percentage students who have tested English proficient on the ELPA21, excluding LEAs with EL populations n&lt;20.  <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with an average greater than 1 percentage point below the rounded down state average receive a score of 2.</li> <li>• LEAs with an average within 1 percentage point below the rounded down state average receive a score of 1.</li> <li>• LEAs with an average above the rounded down state average receive a score of 0.</li> </ul> <p><i>Example: If the state average proficiency is 13.6 and an LEA has an average proficiency of 11.9, the state average is rounded down to 13 and the LEA receives a score of 2.</i></p>	2017–18	Federal Programs, Title III Tableau Dashboard	January
J	EL Transition Rates	<p><b>EL Students Not Yet Transitioned out of EL Services after 5 years</b>  <i>Measure includes students who do not score proficient on the ELPA21 after 5 years or more of ELD services.</i></p>	<p><i>Raw data:</i> In the form of percentage students who have not tested out of ELD services after 5 years by scoring proficient on the ELPA21, excluding LEAs with EL populations n&lt;20.</p>	2017–18	Federal Programs, Title III Tableau Dashboard	March

			<p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with an average greater than 5 percentage points above the rounded up state average receive a score of 2.</li> <li>• LEAs with an average within 5 percentage points above the rounded up state average receive a score of 1.</li> <li>• LEAs with an average below the rounded up state average receive a score of 0.</li> </ul> <p><i>Example: If the state average is 24.6 and an LEA has an average of 30.5, the state average is rounded up to 25 and the LEA receives a score of 2.</i></p>			
K	EL/SpEd	<p><b><i>ELs who Qualify for Special Education</i></b> LEAs that identify their EL students for special education at significantly higher rates than the state for all identified students have a likely potential for misidentifying their EL students.</p>	<p><i>Raw Data:</i> In the form of percentages of ELs who qualify for Special Education by LEA. Excluding data for LEAs with EL populations n&lt;50 AND n&lt;20%.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with an average of 25% or higher receive a score of 2.</li> <li>• LEAs with an average of 20-24.9% receive a score of 1.</li> <li>• LEAs with an average below 20% receive a score of 0.</li> </ul>	2017–18	Federal Programs, Title III Tableau Dashboard	March
L	SpEd IDEA	<p><b><i>Special Ed</i></b> <i>The Individuals with Disabilities Education Act (IDEA) requires the U.S. Department of Education to make annual “determinations” regarding the overall compliance of</i></p>	<p><i>Raw Data:</i> A list of LEAs sorted by compliance classification as determined by the WA state.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs identified as having Met Requirements receive a score of 0.</li> </ul>	2017–2018	Special Ed OSPI Website	November of prior year

		<p><i>each State with the requirements of Part B of the IDEA. States are likewise required to make “determinations” regarding the level of overall compliance each year for each district within the State. IDEA identifies specific technical assistance and/or enforcement actions that the State must take under specific circumstances for districts that are not determined to “meet requirements.”</i></p>	<ul style="list-style-type: none"> <li>• LEAs identified as Needing Assistance receive a score of 1.</li> <li>• LEAs identified as Needing Intervention receive a score of 3.</li> <li>• LEAs identified as Needing Substantial Intervention receive a score of 4.</li> </ul> <p><i>A score of 4 has been given LEAs who need Substantial Intervention, as this is a rare and noteworthy SpEd risk indicator and its score should reflect such. The jump from 1 to 3 in scoring is done because it is the opinion of the CPR department that LEAs should not be significantly scored against for needing intervention; 2 being too weighty a score.</i></p>			
M	CTE State Funds	<p><b>LEA Perkins Allocation Requirements</b> LEAs who do not meet the minimum allocation requirements (less than \$15,000) may not be as familiar with permissible/non-permissible use of funds and/or the requirements for federal grant management. Generally, these LEAs have lower state allocations as well. Due to financial constraints, these LEAs may use their federal funds based on LEA need rather than what is federally mandated. In addition, a higher allocation may mean the LEA could benefit from monitoring.</p>	<p><i>Raw Data:</i> In the form of LEAs state CTE allocation amounts.  <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs that have received allocations as low as \$15,000 or below OR allocations above \$100,000 receive a score of 2.</li> <li>• LEAs that have received an allocation between \$15,000 and \$100,000 receive a score of 0.</li> </ul>	2018–19	CTE Staff	June

N	CTE - PPIP Indicators	<p><b>LEA Perkins Performance Indicators</b>  <i>LEAs that have failed one or more Perkins Indicators for three or more consecutive years via the PPIP review. LEAs who have consecutively failed indicators may be required to use their federal funds in a manner designated by the state to improve local performance scores. Failure to meet state targets set by the federal government is an existing risk factor and reported in the Consolidated Annual Report.</i></p>	<p><i>Raw Data:</i> In the form of LEAs who have failed one or more Perkins Indicators for 3 consecutive years.  <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs that have failed one or more PPIP Indicators for 3 consecutive years receive a score of 2.</li> <li>• LEAs that have not failed one or more PPIP Indicators for 3 consecutive years receive a score of 0.</li> </ul>	2014–17	CTE Staff	June/July
O	Low Income Grad Rate	<p><b>LEA performance</b>  <i>Defined by the number of graduated students identified as low-income compared to their non-cohort group.</i></p>	<p><i>Raw Data:</i> In the form of the percentage of graduated students identified as low-income compared to the students who were identified as non-low-income.  <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with a decrease in the low-income graduation rate and above the average low-income grad rate receive a score of 3.</li> <li>• LEAs with an increase in the low-income graduation rate and above the average low-income grad rate receive a score of 2.</li> <li>• LEAs with a decrease in the low-income graduation rate and below the average low-income grad rate receive a score of 1.</li> <li>• LEAs with an increase in the low-income graduation rate and below the average low-income grad rate receive a score of 0.</li> </ul>	2017–18	Unsuppressed from Student Information	June

P	Funds/FTE	<p><b>Financial-Grant Administration</b>  <i>This measure identifies the magnitude of federal funds in a LEA. Those with higher ratios of funding per full time equivalent (FTE) student are managing more federal programming than those with lower amounts. The risk assessment ranks those with higher ratios ahead of those with lower ratios for the purpose of LEA selection for monitoring and determining an on-site or desk review. The per-FTE ratio provides a proportion LEAs can be ranked by risk by size of LEA.</i></p>	<p><i>Raw data:</i> In list format by LEA for all special programs including their funding.  <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with a Funds/FTE above 1000 received a score of 4.</li> <li>• LEAs with a Funds/FTE above 600 received a score of 3.</li> <li>• LEAs with a Funds/FTE above 300 received a score of 2.</li> <li>• LEAs with a Funds/FTE above 100 received a score of 1.</li> <li>• LEAs with a Funds/FTE below 100 received a score of 0.</li> </ul>	2018–19, 2019–20	Funds – Fiscal Office FTE – Fiscal Office RLIS – Rural Ed Office McKinney-Vento – MV Office	June/July
Q	Risk Audit	<p><b>Audit-Monitoring</b>  <i>This cell raises a focus of concern if a LEA has received any federal audit findings regarding allowability, eligibility, procurement, and reimbursements. Special Education and Child Nutrition findings are excluded.</i></p>	<p><i>Raw data:</i> Raw Data not available.  <i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEA did not require a single audit (under \$ threshold). LEA did not have any federal findings. LEA had a federal finding for a program not included in the CPR and the finding was a program-specific requirement (not cross-cutting such as time/effort). If these qualifications are met the LEA will receive a score of 0.</li> <li>• LEA received one finding and there were no questioned costs. If it was an isolated issue resulting in questioned costs, the LEA will receive a score of 1.</li> <li>• LEA received more than one finding (or there were several issues in one finding) and/or there</li> </ul>	2018–19	Fiscal Office	July

			were questioned costs. Other factors will be considered such as the amount of questioned costs, materiality, systemic control issue, audit history, etc. These LEAs will receive a score of 2.			
R-S	4th Grade Math/ELA SBAC	<b>Student Achievement</b> as defined by the amount of students identified as low-income who met standard for SBAC.	<p><i>Raw Data:</i> A list by LEA for the count of low-income students who met standard on the 2016–17 SBAC for math and ELA.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs whose percentage of low income students met standard below the state average received a score of 2.</li> <li>• LEAs whose percentage of low income students met standard above the state average (as compared to other low income LEAs), but below the state average test score for all populations received a 1.</li> <li>• LEAs whose percentage low income students met standard above the state average test score for all populations received a 0.</li> </ul>	2017–18	Unsuppressed from Student Information	June



# APPENDIX E: EXAMPLE OSPI CPR

## Sample Monitoring Exit Report

**From:** Timothy.McNeely@k12.wa.us  
**To:** XXX  
**CC:** XXX  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report – [REDACTED] School District  
**Attachments:** No attachments found for this message.



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## SUPERINTENDENT OF PUBLIC INSTRUCTION

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/17/2020

TO: Superintendent XXX  
ABC School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/16/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/1/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

## Technical Assistance

Program	Technical Assistance Note
6. Title II, Part A	<p>6.1: LEA is encouraged to continually monitor staffing updates for certification and endorsement matches and to ensure teachers who are placed out-of-field or out-of-endorsement have been approved for the placement.</p> <p>Item 6.3: District is encouraged to have copies of high school diploma (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
12. CTE/Perkins	<p>1. It is recommended that your meeting minutes format includes the date of the previous meeting in the approval of them.</p> <p>2. Please use the PESB website link provided on what is required to be included on Professional Growth Plans. <a href="https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/">https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/</a></p>
14. Civil Rights	<p><b>14.1: Compliance Coordinators.</b> The district is encouraged to review all publications (online and hard copy) that contain its nondiscrimination statement to ensure that Ms. [REDACTED] is the only Title IX Officer listed.</p> <p><b>14.2: Nondiscrimination Statement.</b> All versions of the nondiscrimination statement (online and hard copy) should include full contact information for each compliance coordinator (i.e., name or title, phone number, email address, and mailing address).</p> <p><b>14.3: Complaint Procedures.</b> Consider updating the sexual harassment complaint procedure for students so that it contains the name or title and contact information for the Title IX Officer, instead of "[insert name of appropriate district employee]". Consider using OSPI's sample handbook language in the student and employee handbooks, available here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a> (scroll to Item 14.3, "Sample Student Handbook Language"). OSPI has developed a model civil rights training (i.e., a PowerPoint slide deck and talking points designed to last approximately 30 minutes), which districts may use to fulfill the employee training requirement. It is available on our CPR webpage, here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a>, scroll to Item 14.3 and click on "OSPI Sample Staff Training Slide Deck".</p> <p><b>14.4: Section 504.</b> If it hasn't already done so, the district is encouraged to fully transition to the newer notice of parent rights/procedural safeguards found on our CPR webpage. When writing Section 504 accommodations, the district is encouraged to be as specific as possible, and to be sure to define general terms, such as "extra time" or "preferential seating." Additionally, the district should ensure that it is not making predeterminations about students' eligibility under Section 504- verbiage like "automatically qualifies" should be avoided, since Section 504 requires districts to fully evaluate a student for eligibility before making such decisions.</p> <p><b>14.11: Annual Athletics Evaluation.</b> The district is encouraged not to count activities such as cheer, dance, drill team, debate, band, and drama as athletic participation opportunities for purposes of tracking interests and abilities on page 1 of the building level worksheet. This is because to date, none of these activities has been included by the U.S. Department of Education as athletic participation opportunities under Title IX. For guidance on what counts as an athletic participation opportunity under Title IX, please review: <a href="https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20080917.pdf">https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20080917.pdf</a>. The district is encouraged to keep more specific records to track its outside sources of athletic funding, so that it is clear where the money is being obtained and spent. For example, just looking at the spreadsheet, it isn't clear whether some funds are benefiting the boys, the girls, or both programs (i.e., "State</p>

	Competition \$450", or █████ Athletics \$3933.45"). It is also unclear whether team fundraisers are being included in the spreadsheet (and they should be). Careful monitoring of how this money is spent will help ensure that it is not resulting in inequitable benefits to one sex's program over the other.
15. Fiscal	<p>Purchasing Policy 6220 needs threshold updating. WSSDA's original template for federal procurement of Goods listed incorrect thresholds. The District must use more restrictive \$75,000 state threshold instead of \$250,000 federal threshold. Bulletin 081-18 has been uploaded under 15.2 on 120319.</p> <p>Purchasing, Item 4: Unfortunately, the 09/27/17 email was generic and was not a prior approval specific to the registration. Based on the District's 15_2_15.2 A Accounts Payable Charges – "They approve and review all expenditures before purchasing/payment to ensure they are allowable per the above cost principles and the grant agreement."</p> <p>Technical Assistance: The District should ensure there is clear documentation approving a particular purchase prior to the purchase.</p> <p>Providing food for a meeting using federal funds: Uploaded documentation under 15.2 - this does not include Parent and Family Engagement activities under Title I</p> <ul style="list-style-type: none"> <li>• A grantee hosting a meeting or conference may not use grant funds to pay for food for conference attendees unless doing so is necessary to accomplish legitimate meeting or conference business. <ul style="list-style-type: none"> <li>○ A working lunch is an example of a cost for food that might be allowable under a Federal grant if attendance at the lunch is needed to ensure the full participation by conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.</li> </ul> </li> </ul>

### Action Plan(s) Approved

Program	Number	Description
Title I, Part A	1.1	Ranking and Allocating
Title III/TBIP	7.13	TBIP Eligible Exited Students
Civil Rights	14.7	National Origin and Immigration Status (Student Enrollment and Registration)

### Evidence Needed

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualifications	<p>Please see additional determinations for OTF teachers attached in Program Monitor.</p> <p>The resolutions of 10/1/19 and 1/1/20 are uploaded and signed.</p> <p>Please upload signed minutes of 1/1/20 Board minutes when available.</p>
Gun-Free	8.2	Policy	Please provide evidence that this policy has been made available to all stakeholders.
Homeless	10.5	Identification of Students	C & D Please provide further evidence of the following: Are LEA staff provided specific training on the identification and rights of students experiencing homelessness? Are they provided training

			materials?
Homeless	10.8	Early Childhood	<p>A. &amp; B. Please provide further evidence of the following: Evidence of coordination between the LEA's McKinney-Vento program and the LEA's preschool program(s). Evidence may include proof of preschool staff training, copies of homeless education parent resources, completed housing questionnaires.</p> <p>C: Please provide evidence that your child find notice includes language specific to students experiencing homelessness.</p>
Homeless	10.11	Title I Set-Aside	<p>Please provide further information:</p> <p>What are the professional development and outreach funds being used for (from your Title I Application)?</p> <p>How would medical needs be covered if there was a need?</p>
Highly Capable	11.2	Identification Process & Consent	Please clarify: appeal form on website states 10 days to appeal, procedure document says 30-day window.
Highly Capable	11.4	Criteria for Identification	Please clarify with evidence how "computerized assessment produces more valid results than classroom proctoring" as noted in "criteria for ID."
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	<p>B. Please provide current articulation agreements for:</p> <ol style="list-style-type: none"> <li>1. Engineering</li> <li>2. Early Learning</li> <li>3. Financial Planning</li> <li>4. WSL Cooperative Education</li> </ol>
Private Schools	13.1	Consultation	<p>Provide a brief description of the LEA's process to contact and assist private schools in completing their intent to participate in federal programs in the EDS tool. Also, provide a brief description of the initial and ongoing consultation process, and include evidence such as letters, agendas, meeting notes, sign-in sheets, etc.</p> <p>This is for participation in other federal programs, not special education.</p>
Private Schools	13.2	Complaint Process	Incorrect version of the complaint procedures are uploaded. Please provide the 2019 version and an assurance statement that the most current version is reviewed with the private schools.
Private Schools	13.3	Professional Development	Please provide actual evidence that the Private school teachers participated in professional development activities based on the private school's plans (e.g., contracts, registrations, sign-in sheets).
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	H: Employee Training. Please submit an action plan describing how the district will document employees' attendance/completion of the training and the date by which all training will be complete (must be within 2019-20 school year).

Civil Rights	14.11	Annual Athletic Evaluation	<p><b>C: Action Plans.</b> The athletic evaluation for the 2018–19 school year identified a potential disparity between the NKHS baseball and softball facilities. Please explain what steps the district has put in place to analyze and, if necessary, correct this disparity.</p> <p><b>D: Description of Process to Ensure Equity in Athletics Funding.</b> Once the district’s procedure for handling and disbursing money raised by team fundraisers is ready, please submit a copy for review.</p>
OSSI	16.2	School Improvement Plans	<p>A – Please provide a short description (250-1000 words) that details the board of directors' feedback and approval process for school improvement plans at their annual meetings.</p> <p>B – Please provide evidence for some of the evidence-based practices listed in 16.2.B. (There is no school improvement plan for the district's only school identified for Comprehensive support: Pal Program.)</p> <p>D – Please upload Pal Program's school improvement plan to the OSSI SharePoint site for review.</p>
Title IV, Part A	18.1	Comprehensive Needs Assessment	<p>The US Department of ED has recently clarified that the LEA must complete the needs assessment as required by ESEA Section 4106 in order to receive the allocation. This means it is required regardless of whether funds were transferred to another Title program.</p> <p>Please submit some evidence that the district examined needs for improvement of:</p> <ul style="list-style-type: none"> <li>-Access to, and opportunities for, a well-rounded education for all students;</li> <li>-School conditions for student learning in order to create a healthy and safe school environment; and</li> <li>-Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.</li> </ul> <p>Or submit an action plan that you will include these during your next planning period.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.5	English Language Development Services	<p>Please submit an action plan for ensuring that all English learners receive English language instruction that is designed by qualified staff.</p> <p>Services must support the language domains of Speaking, Listening, Reading, and Writing. Program services for each student must be reasonably calculated to enable students to attain English proficiency within a reasonable length of time.</p>

CTE/Perkins	12.1	Assurances and Plan Approval	B: Please provide the minutes from the School Board meeting in which the Perkins Local Plan was approved.
CTE/Perkins	12.4	Special Populations	C: Please provide CTE Instructor ELL Training Log that has the date and year of the training and the Sign-In Sheet.  This is the same one provided for GLAD and SIOP where there were no dates or year indicated.
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	B: Please provide a copy of official membership roster, or paid invoices for [REDACTED] CTSO for FBLA.  Please provide a copy of official membership rosters, official charter letter or paid invoices for [REDACTED] CTSOs: FBLA, DECA, FFA and [REDACTED], and [REDACTED] as appropriate.  Please provide equivalencies for: STS, Recording Arts; STS, Metal Jewelry; STEM, Engineering; Family & Consumer Science, Culinary Arts; Family & Consumer Science, ASL; Ag Ed and Science, Environmental Science.  D: Please provide a current completed [REDACTED] CTE Extended Days 2019-20 verification form.
Civil Rights	14.8	Course and Program Enrollment	A: <b>Description of Process.</b> Please supplement the District's current response by clarifying how the district determines whether a disproportionality exists. For example, does the district consider a difference of +/-1% to be a "disproportionality," or is does it use a higher threshold, perhaps +/-5% threshold higher, perhaps around 5%?  B: <b>Evidence of Implementation.</b>  <ol style="list-style-type: none"> <li>1. Data: The district needs to submit data samples from two middle schools. Note that the worksheet for MSOP is missing some data and needs to be completed.</li> <li>2. Once the data review sessions occur in January, the district will need to submit a narrative, report, or meeting minutes that demonstrate and explain how the district analyzed its data to identify and determine the cause of any disproportionalities.</li> <li>3. Once the data review sessions occur in January, the district needs to submit a list of any identified disproportionalities in each building.</li> </ol> C: <b>Action Plans.</b> Once the data review sessions have occurred in January, and if substantial disproportionalities were identified in any building, provide evidence that demonstrates that the district is addressing them to ensure they are not the result of discrimination. Evidence must include at least the following:  <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building's plan to address each disproportionality to ensure it is not the result of</li> </ol>

			discrimination (e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling).
Civil Rights	14.9	Student Discipline	<p>B: Evidence of implementation. Please submit ██████ Middle School's student discipline data, disaggregated by race, sex, EL status, Section 504 status, and special education status. Please submit a narrative, report, or meeting minutes explaining how the district analyzed its data in each building to identify and determine the cause of any substantial disproportionalities that may exist. Please list any substantial disproportionalities that were uncovered.</p> <p>C: Disproportionalities and action plans. The plans submitted are quite broad, and it is unclear how they are intended to address each specific disproportionality identified. Please submit the district's plan to address each substantial disproportionality it identified. Make sure that each action plan is specifically targeted at a particular disparity.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p><b>B: Survey results for each building.</b></p> <p>Please provide survey results, disaggregated by sex, for each building offering interscholastic athletics. Consider using OSPI's Survey Results Summary worksheet, available here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx</a>.</p> <p><b>C: Three-Part Test Analysis.</b></p> <p>Once the Three-Part Test Analysis is completed (in early February) for each building offering interscholastic athletics, please upload to the Program Monitor Tool. Download the required worksheet here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip</a></p>
Fiscal	15.3	Payroll Charges	<p>1 of the 8 Time &amp; Effort should have been monthly due to state and federal funding, District provided an Annual Certification.</p> <p>Please review Bulletin B048-17 and provide an Action Plan describing the steps the District will take to ensure accurate Time &amp; Effort will be documented.</p>

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

- XXX, CPR Contact 1, ABC School District
- XXX, CPR Contact 2, ABC School District
- XXX, Civil Rights Contact, ABC School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

# APPENDIX F: SBCTC EXAMPLE

## MEMORANDUM



September 3 2019

Ref: 19-32-27

Dear Colleagues,

As we approach a new school year, I would like to take this opportunity to remind everyone of Department of Education's Office of Civil Rights (OCR) requirement for an *Annual Public Notice of Career and Technical Education Opportunities*. This requirement is applicable to all schools receiving federal funds that offer one or more career or technical programs. Previous civil rights reviews indicate that many institutions are not aware of this requirement and are not providing the required notice to the general public.

Guidelines<sup>1</sup> require all career and technical colleges receiving federal assistance to disseminate a notice prior to the beginning of each school year to the general public notifying the public that all career and technical education opportunities will be offered without regard to *race, color, religion, national origin, sex, age, or disability*.

The notification must:

- Be made prior to the beginning of each school year;
- Advise students, parents/guardians, employees and the general public of the policy of nondiscrimination;
- Provide the name, title, office address, telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance.
- Provide a brief summary of program offerings.
- Provide a brief description of admission criteria.
- Contain an assurance that lack of English language skills will not be a barrier to admission and participation in career and technical education programs, and
- Be disseminated to communities of national origin minority persons with limited English language skills in their native language.

Please be advised that although dissemination of the notice through an institution's main website was not allowed previously, in recent years OCR has changed its position on this requirement. Colleges may now disseminate the annual notification via their main website, if it can be demonstrated that it would reach the community it serves. Publication in a local newspapers, school catalogs, and newsletters mailed to members of the community, bulletins, memoranda, and the

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<sup>1</sup> Title IX: 34 CFR 106.8(b), Section 504: 34 CFR 104.7(a), and Title II: 28 CFR 35.107(a) Guidelines IV-O



college websites are still acceptable methods of disbursing the notification and may be required if a college's service area contains a population with limited access to computers and/or not regular users of technology.

Please note that evidence that the notification has been made and that the method of distribution is sufficient to reach students, employees, and members of the public should be maintained and will be required for civil rights reviews.

In addition to the requirement for the annual non-discrimination notice, OCR also requires continuous notices of non-discrimination to be published in newspapers and magazines operated by the school or its students, alumnae or alumni newspapers or magazines, memoranda, or other written communications distributed to students and employees. In addition, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, or employees. The notice must include the title, office location, and phone number for individual(s) tasked with ensuring compliance with Title IX and disability regulations. The use of the coordinator's name is not required for printed material, but is required on the college's website. OCR suggests the inclusion of an email address for coordinators, however at this time, an email is not required.

If you have any questions or need any additional information, please feel free to contact me at (360) 704-4389 or [mjacobs@sbctc.edu](mailto:mjacobs@sbctc.edu).

Regards,

*Maryam A. Jacobs*

Maryam Jacobs, CPA, CFE  
System Internal Auditor & Methods of Administration Coordinator

# APPENDIX G: OSPI MOA REPORTING FORM



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**

CAREER AND TECHNICAL EDUCATION  
Old Capitol Building | PO BOX 47200 | Olympia WA 98504-7200

## Methods of Administration Overview Report

This report reflects the administration of MOA between the dates of (date) and (date).

<b>Part A: Staff Resources:</b>		
<b>Identification of resources allocated to the MOA compliance program during each year of the reporting period.</b>		
School Year		
Staff Name	Staff Role	Outcome
General Resource Description:		
School Year		
Staff Name	Staff Role	Outcome
General Resource Description:		
<b>Part B: State Agency's Compliance:</b>		
<b>Description of OSPI's compliance with Section II(A) of the <i>Guidelines</i> (relating to distribution of funds, admissions and administration, approval of local entity action, and conducting state-run programs.)</b>		

**Part C: Subrecipients:**

A list of subrecipients for which OSPI conducted compliance reviews.

School Year	
Subrecipient (District/Skill Center/Tribal School)	Method (desk/onsite)
	Desk Review
	Onsite Review
	Choose an item.
	Choose an item.
	Choose an item.
	Choose an item.
	Choose an item.
	Choose an item.

Common findings to inform technical assistance:

School Year	
Subrecipient (District/Skill Center/Tribal School)	Method (desk/onsite)
	<u>Onsite Review</u>
	<u>Onsite Review</u>
	Choose an item.
	Choose an item.
	Choose an item.

Common findings to inform technical assistance:

**Part D: Results**

Copies of any written findings or compliance plans issued.

**Please see attached copies of applicable exit reports**

**Part E: Technical Assistance**

Description of technical assistance services offered to subrecipients to address gaps in access and success for CTE students in CTE programs.

**Optional: Feedback to Federal Civil Rights Resources.**

# APPENDIX H: OSPI EQUITY ASSURANCE REPORT

Page 1

**This form package is an assurance only. Please maintain documentation of compliance with each item at the district.**

OSPI monitors compliance with each item during Consolidated Program Review. In addition, districts may be required to provide documentation of compliance at any time.

School District Contacts	
<i>The name and contact information of each school district's current compliance coordinators will be made available on the OSPI website. In addition to ensuring the district's compliance with civil rights laws, these employees serve as points of contact for OSPI to communicate information and resources related to civil rights compliance. OSPI may also use this information to refer individuals to their school district's compliance coordinator to facilitate local resolution of discrimination concerns.</i>	
<b>Please visit the <a href="#">Equity and Civil Rights Website</a> to make sure each coordinator's name and contact information is current. If necessary, updates can be made on the website.</b>	
Title IX Compliance Coordinator	
<b>NAME:</b>	<input type="text"/>
<b>TITLE:</b> (e.g., Superintendent, Principal, HR Director, etc.)	<input type="text"/>
<b>PHONE NUMBER:</b> (Use format 555-555-5555)	<input type="text"/>
<b>EMAIL ADDRESS:</b>	<input type="text"/>
<b><a href="#">Sample Job Description</a></b>	
Section 504 Compliance Coordinator	
<b>NAME:</b>	<input type="text"/>
<b>TITLE:</b> (e.g., Superintendent, Principal, HR Director, etc.)	<input type="text"/>
<b>PHONE NUMBER:</b> (Use format 555-555-5555)	<input type="text"/>
<b>EMAIL ADDRESS:</b>	<input type="text"/>

**Sample Job Description**

**Civil Rights Compliance Coordinator (Chapters 28A.640 and RCW 28A.642 RCW, and Chapter 392-190 WAC)**

<b>NAME:</b>	<input type="text"/>
<b>TITLE:</b> (e.g., Superintendent, Principal, HR Director, etc.)	<input type="text"/>
<b>PHONE NUMBER:</b> (Use format 555-555-5555)	<input type="text"/>
<b>EMAIL ADDRESS:</b>	<input type="text"/>

**Sample Job Description**

**Page 2**

**Language Access Policy and Procedure**

Has your school district adopted the WSSDA model policy on Language Access (Policy 4218)?

[WSSDA Language Access Policy and Procedure](#)

(response required)

If **YES**, please include a link to the policy, or upload it below.



If **YES**, has your school district adopted procedures to implement the Language Access Policy (e.g., Procedure 4218P)?

**Upload files here (optional).**

**File names may *not* include symbols.**

Enter file to upload

Upload

Uploaded Files	Uploaded By	Uploaded At
<b>Files have not been uploaded</b>		

**Background:**

In accordance with ESSB 6052, OSPI is required to maintain a list of school districts that have and have not adopted the WSSDA model policy on language access (Policy 4218). While districts are not required to adopt a language access policy or procedure, it is highly recommended to make sure your district meets its obligation to provide interpretation and translation services for limited-English proficient families.

**Page 3**

**Gender-Inclusive Schools Policy and Procedure**

Has your school district adopted the WSSDA model policy on Gender-Inclusive Schools (Policy 3211), or has your school district adopted a policy that incorporate all of the elements of WSSDA’s model policy on Gender-Inclusive Schools?

[WSSDA Gender-Inclusive Schools Policy and Procedure](#)

Select (response required)

If **YES**, please include a link to the policy, or upload it below.



If **YES**, has your school district adopted the WSSDA model procedure on Gender-Inclusive Schools (Procedure 3211), or has your school district adopted a procedure that incorporate all of the elements of WSSDA’s model procedure on Gender-Inclusive Schools?

Select (response required)

If **NO**, please include a link to the procedure, or upload it below.



If **NO** to either question, please describe your school district’s plan and timeline to adopt or amend policies and procedures that, at a minimum, incorporate all the elements of the WSSDA model Gender-Inclusive Schools policy and procedure, as required in RCW [28A.642.080](#).



**Upload files here (If links not provided above).**

**File names may *not* include symbols.**

Enter file to upload

Upload

Uploaded Files	Uploaded By	Uploaded At
----------------	-------------	-------------

**Files have not been uploaded**

***Background:***

In accordance with SSB 5689 (codified at RCW 28A.642.080), by January 31, 2020, each school district must adopt or amend, if necessary, policies and procedures that, at a minimum, incorporate all the elements of the model transgender student (Gender-Inclusive Schools) policy and procedure.

**Page 4**

**This form package is an assurance only. Please maintain documentation on site of compliance with each item.**

OSPI monitors compliance with each item during Consolidated Program Review. In addition, your district may be required to provide documentation of compliance at any time.

**Civil Rights Assurance**

OSPI encourages districts to use this list to annually self-assess compliance with various civil rights requirements. This list is aligned with the [Civil Rights Consolidated Program Review Checklist](#), which can also be a helpful tool to regularly self-evaluate and document compliance, even outside of the Consolidated Program Review process.

For assistance or questions about these requirements, please contact us.

***The district provides the following assurances:***

**Compliance Coordinator and Staff Training:**

- The Civil Rights Compliance Coordinator, Title IX Compliance Coordinator, and Section 504 Compliance Coordinator have received training necessary to coordinate the district’s compliance with state and federal nondiscrimination laws. Each compliance coordinator understands their responsibilities under [OSPI’s Civil Rights Guidelines](#).  
[Learn more about this](#)
- All administrators and certificated and classroom personnel have received training regarding their responsibilities under civil rights laws and to raise awareness of and eliminate bias based on all protected classes.  
[Learn more about this](#) | [Sample training materials](#)

**Nondiscrimination Statement**

- The district includes a nondiscrimination statement on all district and building publications, such as handbooks, newsletters, CTE publications, announcements, website, catalogs, application forms, and recruitment materials. The statement includes each of the following:
  1. Notice that it does not discriminate based on sex, race, creed, religion, color, national origin, age, veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of trained dog guide or service animal, and provides equal access to the Boy Scouts of America and other designated youth groups; and
  2. The name or job title, office address, email address, and telephone number of the current Title IX coordinator, Section 504 coordinator, and civil rights coordinator.  
[Learn more about this](#) | [Sample statement](#)

**Discrimination Complaint Procedure**

- The district has adopted a discrimination complaint and appeal procedure that is consistent with the requirements in state law (WAC [392-190-060](#) through [392-190-075](#), revised Dec. 2014).  
[Learn more about this](#)
- The district informs students, parents, and employees about the discrimination complaint procedure each year, such as in student and staff handbooks.  
[Learn more about this](#) | [Sample handbook language](#)

**Sexual Harassment**

- The district’s sexual harassment policy or OSPI’s sexual harassment poster is posted in each school building in a location visible to students and staff. Comprehensive information about the district’s sexual harassment policy and complaint procedure is included in student and employee handbooks—including who to contact to report sexual harassment and to receive a copy of the policy and procedure.  
[Learn more about this](#) | [Sample poster and student handbook language](#)

**Section 504**



- The district identifies and evaluates students with disabilities under Section 504 and provides all necessary accommodations, related aids, and services for students to access and benefit from their education. The district provides parents with prior written notice, including notice of procedural safeguards, when any actions are taken regarding identification, evaluation, or placement under Section 504.  
[Learn more about this](#) | [Sample procedural safeguards notice](#)
- The district conducts manifestation determinations for students who are protected under Section 504 when disciplinary removals result in a change in placement, such as a pattern of suspensions resulting in removal for ten or more school days in a school year.  
[Learn more about this](#)

### **Language Access Services**

- The district provides qualified adult interpreters to communicate with parents with limited English proficiency, such as at parent-teacher conferences, IEP meetings, discipline meetings, etc. The district translates vital documents—such as enrollment forms, discipline notices, and information about school programs—for parents with limited English proficiency within the district.  
[Learn more about this](#) | [Resources and sample translated documents](#)

### **English Language Development Services**

- The district identifies and assesses students with limited English proficiency (English Learners) who need special language assistance, including use of a home language survey and provisions for testing students on the Washington language proficiency placement test.  
[Learn more about this](#) | [Home language survey](#)
- The district provides effective English language development services for English Learners using staff who are qualified and receive ongoing training in the English language development services being provided. The district evaluates the effectiveness of its English language development services, including determining whether or not students are making progress using the services the district provides.  
[Learn more about this](#)

### **National Origin and Immigration Status**

- The district does not inquire about students’ or parents’ U.S. citizenship status or immigration status. The district does not request a student’s or parent’s Social Security Number, unless the district (1) informs the individual that disclosure is voluntary, (2) provides the legal basis for why the district is requesting the number, and (3) explains how the district will use the number.  
[Learn more about this](#)

### **Equal Access to Courses and Programs**

- The district at least annually reviews disaggregated course and program enrollment data to identify potential disparities based on (1) sex, (2) race, (3) English Learner-status, and (4) disability (Special Education and Section 504). If the district identifies disparities in course and program enrollment, the district takes steps to ensure it is not the result of discrimination, including in the identification and selection of students, enrollment criteria, tests and appraisal

instruments, guidance materials, scheduling and placement, etc.

[Learn more about this](#) | [Sample data worksheet](#)

- The school district does not provide single-sex classes or schools, except in limited circumstances as allowed by the OSPI Guidelines.

[Learn more about this](#)

### **Equity in Student Discipline**

- The district at least annually reviews disaggregated student discipline data to identify potential disparities based (1) sex, (2) race, (3) English Learner-status, and (4) disability (Special Education and Section 504). If the district identifies disparities in discipline, the district takes steps to ensure it is not the result of discrimination.

[Learn more about this](#) | [Data and resources](#)

### **Sex Equity in Athletic Programs**

- Each middle and high school building that offers athletics conducts an annual evaluation to ensure the overall benefits and treatment of the boys' and girls' athletic programs are comparable, considering all of the following factors: accommodation of interests and abilities, coaching and tutoring, equipment and supplies, scheduling; facilities, medical services and training (physical trainers, etc.), publicity and awards, and travel and per diem.
- The district administers a student athletic interest survey at least every three years at each middle and high school building that offers an athletic program. The district uses OSPI's survey instrument, unless the district received prior approval from OSPI's Equity and Civil Rights Office. The district analyzes all survey results to identify the top requested sports, by sex and by building, and the top reasons for nonparticipation, by sex and by building.

[Learn more about this](#) | [Sample evaluation worksheets](#)

[Learn more about this](#) | [Athletic interest survey](#) | [Athletic Opportunities Worksheet](#)

- The school district has a process to ensure that athletic fundraising, donations, and booster clubs do not result in disparities that favor one sex over another.

[Learn more about this](#)

**Check to indicate the district assures compliance with each of the above requirements.**

**If the district cannot assure compliance with each of the above requirements, please explain what specific steps the district is taking to meet these requirements:**



# LEGAL NOTICE

The below legal notice will be updated with the appropriate information for OSPI and SBCTC as this is a joint document.



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