

# Civil Rights Reviews

*Conducted by the Illinois Community College Board  
on behalf of the United States Department  
of Education, Office for Civil Rights*




# Authority

**United States Department of  
Education, Office for Civil Rights  
(OCR)**



**The Guidelines for Eliminating Discrimination and  
Denial of Services on the Basis of Race, Color,  
National Origin, Sex, and Handicap in Vocational  
Education Programs (Guidelines) (34 C.F.R. Part 100,  
Appendix B)**



**Methods of Administration (MOA)  
program**



**Illinois Community College Board  
(ICCB)**

# Authority

***The Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (Guidelines)*** (34 C.F.R. Part 100, Appendix B)

- Requires each state agency responsible for the administration of CTE programs to conduct compliance reviews of sub-recipients that **1.** offer CTE programs and **2.** receive federal Perkins funding from the USDOE.
- Provided for the creation of the **Methods of Administration (MOA)** program



# MOA Program

The purpose of the MOA program is to ensure that all students, *regardless of race, color, national origin, sex, or disability*, have equal access to high quality CTE programs. Through its MOA authority, OCR oversees the civil rights compliance programs of state agencies that administer career and technical education.



“No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.”

—Civil Rights Act of 1964

# Other Pertinent Legislation

ICCB must also ensure compliance with:

- Title VI of the Civil Rights Act of 1964 (34 C.F.R. Part 100)
  - Race, color, and national origin
- Title IX of the Education Amendments of 1972 (34 C.F.R. Part 106)
  - Sex
- Section 504 of the Rehabilitation Act of 1973 (34 C.F.R. Part 104)
  - Disability
- Title II of the Americans with Disabilities Act of 1990 (28 C.F.R. Part 35)
  - Disability

# Purpose

Per the ***Guidelines***, the ICCB is required to:

- 1) Monitor sub-recipients for civil rights compliance
  - a. Collect and analyze civil rights info and data
  - b. Conduct periodic compliance reviews
- 2) Provide technical assistance
- 3) Report activities and findings to OCR



# Selection Criteria

## Sex, Disability, Race

*These criteria ensure that appropriate emphasis is given to the degree of difference between CTE enrollments and total college-wide enrollment.*

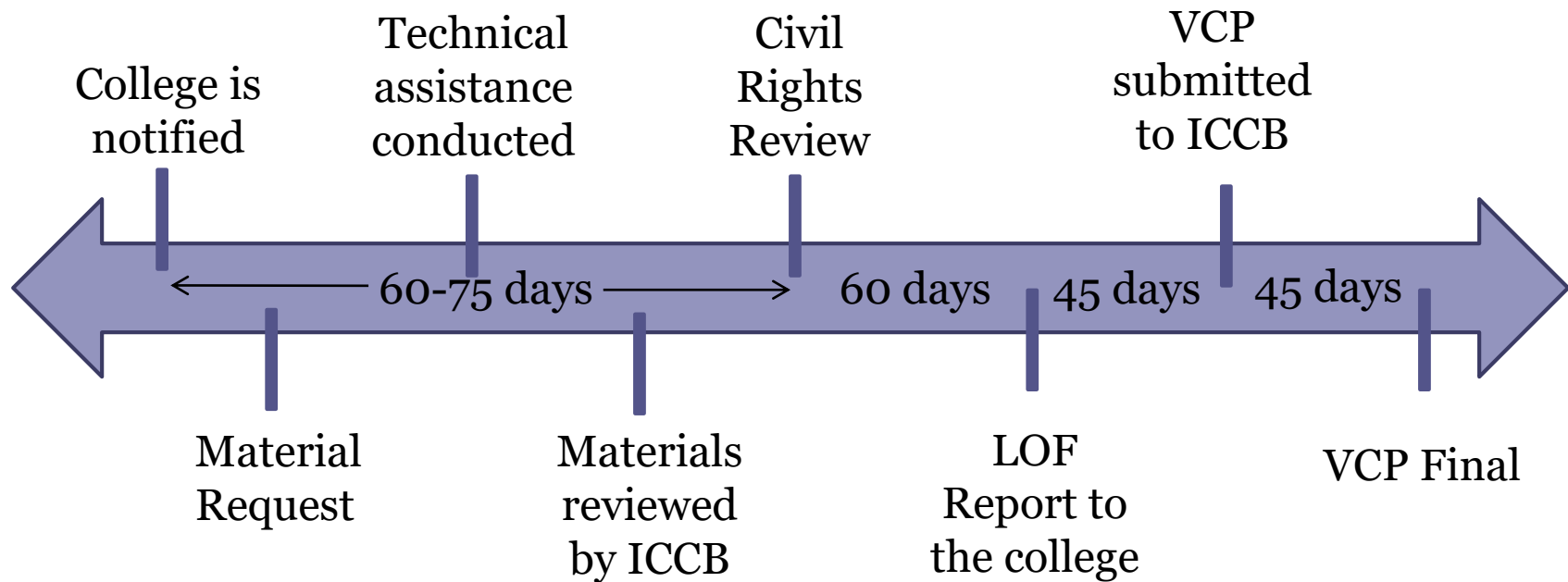
- Based on the percentage point difference between the overall college enrollments and the CTE program enrollments for sex, disability, and race

## Prior Review

*Utilizing the following scale, the ICCB assigns points to a community college based on if and/or when the community college received an on-site review.*

POINT ASSIGNMENTS FOR PRIOR REVIEWS	
PRIOR REVIEW	POINTS ASSIGNED
The community college has never been reviewed.	10
The community college was reviewed over 5 years ago.	5
The community college was reviewed within the last 5 years.	0

# Process Overview





# Prior to Review:

- The ICCB requests materials to be submitted for review prior to the on-site visit.
- Technical assistance is scheduled and conducted.
- Requested materials are reviewed by members of the ICCB review team.

## During the Review:

- ICCB staff will meet with various groups including administrators, faculty, and students to discuss college policies and practices related to areas covered by relevant civil rights laws.
- ICCB staff will tour the campus to examine compliance with accessibility standards.

# What is Reviewed?



Recruitment materials

Facilities (e.g. classrooms, labs, parking lots, restrooms, common areas, student service areas)

Hiring process

College Catalog (e.g. nondiscrimination notice and statement, identification of Title IX/Section 504 Coordinator(s), grievance procedures)

Cooperative Agreements with Work-Study/ Internship/ Clinical sites

# After the Review:

- ICCB staff will thoroughly analyze all information collected as part of the review.
- ***Letter of Finding (LOF)***
  - The LOF compiles the results of the review and outlines any issues of noncompliance
  - Issued to the college within 60 days of the review
- ***Voluntary Compliance Plan (VCP)***
  - The VCP [is issued with the LOF simultaneously and] must address each area of noncompliance and provide an action plan for correcting it
  - The college then has 45 days to submit the VCP for ICCB approval
- Once the VCP is approved by the ICCB, the college shall periodically submit documentation verifying completion of each finding.

# Accountability

The ICCB is required to submit a biennial report to the Office for Civil Rights. This report includes the selection criteria for the corresponding review years and all on-going Letters of Finding and Voluntary Compliance Plans.

# Resources

- [www.ilcivilrightsreview.com](http://www.ilcivilrightsreview.com)

Questions? Please contact:

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