

**Methods of Administration (MOA) for Complying
with Civil Rights Requirements
in
Vocational Education Programs**

Prepared under the direction of the

Vocational Education Unit of
The California Community Colleges
Revised 10/95

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CALIFORNIA COMMUNITY COLLEGES

VOCATIONAL EDUCATION METHODS OF ADMINISTRATION

SECTION I - INTRODUCTION

In December of 1977, the Office for Civil Rights (OCR) under the then Department of Health, Education and Welfare was mandated in an injunctive order (Adams vs. Califano) to issue guidance on the elimination of discrimination in vocational education. After consideration of extensive public comment, in March 1979, the Department issued Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs. The mandated requirements of the Guidelines were that all State Education Agencies develop and administer a civil rights compliance program that included regular monitoring of vocational education programs for compliance with the Guidelines, technical assistance and training to subrecipients, and coordination of activities with federal and state agencies. These Guidelines were designed to clarify the responsibilities of persons involved in federally funded vocational education programs in relation to:

- o **Title VI of the Civil Rights Act of 1964** which prohibits discrimination on the basis of race, color, and national origin in any program or activity receiving federal financial assistance;
- o **Title IX of the Education Amendments of 1972** which prohibits discrimination on the basis of sex in education programs receiving or benefitting from federal financial assistance; and,
- o **Section 504 of the Rehabilitation Act of 1973** which prohibits discrimination on the basis of handicap in any program or activity receiving federal financial assistance.

The Guidelines required that each state develop Methods of Administration to further clarify the responsibilities of vocational educators in performing their activities in a manner that does not discriminate on the basis of race, color, national origin, sex, or handicap.

Vocational Education has the responsibility of offering a balanced program that provides equal access and admission for all students. Included is the motivation of students to learn to be successful in occupations which are non-traditional. Vocational Education has the responsibility of preparing students for multiple career options. These options must be available in a manner that does not discriminate on the basis of race, color, national origin, sex, or handicap.

The Methods of Administration was originally prepared as a joint effort by the California State Department of Education (CSDE) and the Chancellor's Office, California Community Colleges (COCCC) and was approved on September 4, 1980. Because they are independent legal agencies under state law, the CSDE and the COCCC chose to divide responsibilities under the MOA so that each agency would deal separately with its own subrecipients.

The Chancellor's Office of the California Community Colleges (COCCC) has conducted MOA reviews since 1980 and has submitted MOA annual reports to the Office for Civil Rights. OCR has found these past reports to show some deficiencies in the COCCC's overall performance which have been resolved through successful oral negotiations and written commitments to address identified deficiencies. This revised MOA reflects the agreements and revisions developed in the past and is designed as a separate MOA from that of the California State Department of Education.

SECTION II - RECIPIENTS

The definition of "recipient" of Federal financial assistance is established by the regulations implementing Title VI, Title IX, and Section 504. As defined:

For the purposes of Title VI:

Any state, political subdivision of any state or instrumentality of any state or political subdivision, public or private agency, institution, organization or other entity, or any state to whom federal financial assistance is extended, directly or through another recipient, for any program (34 CFR 100.13(i)).

For the purposes of Title IX:

Any state, political subdivision or instrumentality of a state or political subdivision, any public or private agency, institution, organization or other entity, or any person to whom federal financial assistance is extended directly or through another recipient and which operates an education program or activity which receives or benefits from such assistance (34 CFR 106.2(h)).

For the purpose of Section 504:

Any state or political subdivision, or instrumentality of a state or its political subdivision, any public or private agency, institution, organization or other entity, or any person to which federal financial assistance is extended directly or through another recipient (34 CFR 104.3(f)).

A. Subrecipients

Educational agencies, private or public, or any individual to whom or to which federal financial assistance is extended directly or indirectly are identified in the Guidelines as covered recipients:

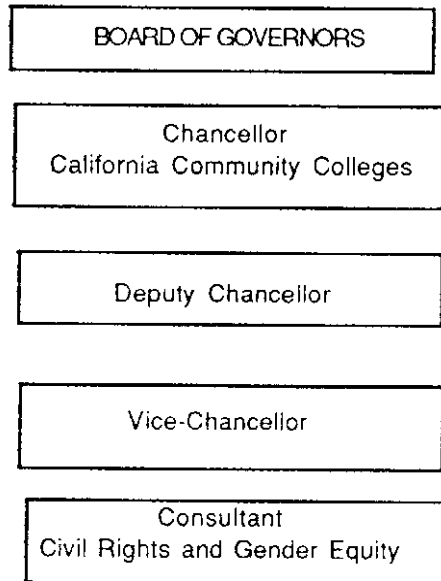
1. The administrative board of a technical or vocational school that is used exclusively or principally for the provision of vocational education to individuals who have completed or left high school (including those seeking a certificate or an associate degree through a vocational program offered by the school) and who are available for study in preparation for entering the labor market.
2. The board of education of a public school district and its administrative agency.
3. The administrative board of a specialized vocational school serving students from more than one school district.
4. The administrative board of a postsecondary institution such as a technical institute, skill center, junior college, community college, or four year college that has a department or division that provides vocational education to students seeking immediate employment, a certificate, or a degree.
5. The administrative board of a private vocational education school under contract to a subrecipient.
6. A state agency operating a vocational education program.

B. Agencies/Colleges

Agencies or colleges that receive Federal financial assistance through a state agency are identified in the guidelines as subrecipients which are subject to State oversight and include a junior college, community college, or four year college that has a department or division that provides vocational education to students seeking immediate employment, an associate degree, or a certificate through a course of vocational instruction offered by the school.

SECTION III - ORGANIZATION OF COMPLIANCE ACTIVITIES

The Chancellor's Office, California Community Colleges is responsible for the development and implementation of the Methods of Administration (MOA). The administrative process and organizational structure of those designated to administer the OCR Guidelines are as follows:



The consultant from the California Community Colleges with responsibility for carrying out the OCR compliance program is:

Nancy Davenport
Civil Rights and Gender Equity Specialist
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(916) 327-5491

The revised Methods of Administration document was developed by a consultant with expertise in the field of civil rights. Consultation with staff from the Office for Civil Rights, San Francisco, and staff members of the Chancellor's Office, provided input in stages: first, a review and discussion of the original design and the modification of that design; second, a draft of the revised MOA; third, modification and review of the draft of the MOA; fourth, a review and submission of the final draft of the MOA, with appropriate revisions, sent to the Chancellor's Office for review and approval.

Upon receiving approval, the final revised MOA was signed by the Chancellor and submitted to the Office for Civil Rights for approval.

Responsibility for implementing the MOA is assigned to the Civil Rights Specialist who reports directly to the Vice Chancellor, Economic Development and Vocational Education Unit, in the monitoring and technical assistance process, and/or an outside contractor with expertise in the area of Civil Rights. The contractor must work closely with the Civil Rights Consultant and/or support staff from the Chancellor's Office, California Community Colleges. If the COCCC uses an outside consultant to assist with implementation of the MOA, the contract will be awarded prior to the start of the time period for the MOA activities it covers. If the COCCC uses internal staff to implement the MOA, it will allocate sufficient time and staff persons with appropriate training, to conduct the MOA activities within the timeframes stated in this MOA document. The following tasks will be performed in implementing the Office for Civil Rights Guidelines for Vocational Education:

1. Review community college policies and procedures that affect vocational education's internal operation, policies, and procedures affecting Local Educational Agencies (colleges), to determine if overt or covert discrimination is in evidence and/or if certain policies and procedures result in a discriminatory effect.
2. Conduct an agency level (desk audit) review of 25% of the Local Educational Agencies (colleges) each year. Desk audit selection to be in cooperation and conjunction with the COCCC Civil Rights Consultant.
3. Plan and conduct reviews of state-operated programs, if appropriate.
4. Analyze selected statistical data and other information concerning vocational program enrollments of desk audit colleges and/or districts.
5. Conduct on-site reviews of a minimum of 25% of the subrecipients receiving a desk audit review for a minimum of 100% over a four year period.
6. Assist LEAs (colleges) to develop appropriate compliance plans which identify corrective actions of compliance issues, specific time lines for resolving lack of compliance issues, and appropriate individuals and/or resources to ensure that corrective actions are being implemented.
7. Conduct yearly follow-up and monitoring of selected LEAs (colleges) to ensure that corrective activities are being conducted and that the plans are being implemented.
9. Provide technical assistance in identifying compliance issues, remediating potential lack of compliance issues, or improving existing compliance efforts.

SECTION IV - REVIEW OF STATE POLICIES AND STATE OPERATED INSTITUTIONS AND PROGRAMS

Each state is responsible for conducting an internal policy and procedural review to ensure that all policies and procedures are applied and conducted without discrimination on the basis of race, color, national origin, sex, or handicap. The review shall include, but not be limited to the following:

1. Review of community college criteria and formulas for the distribution and expenditure of federal and state funds including the awarding of competitive grants or contracts, criteria, and dissemination of information. Information and/or data to be reviewed include state/community college policies and other directives on funding of subrecipient programs to ensure that the criteria, formula, and instruction for the application of funds does discriminate and/or deny services on the basis of race, color, national origin, sex, or handicap.

2. **Review of community college requirements for admission and/or administration of vocational education programs. Information and/or data to be reviewed may include the California Community Colleges Plan for Vocational Education and sections of the Administrative Code that deal with vocational education to ensure nondiscrimination and denial of services on the basis of race, color, national origin, sex, or handicap.**
3. **Review of actions regarding the approval of geographic locations or sites including applications and contracts and previous awards to ensure lack of discrimination and denial of services on the basis of race, color, national origin, sex, or handicap.**
4. **Review of community college hiring, termination, promotion, and transfer policies and affirmative action including directions given to subrecipients and access to programs and people to ensure nondiscrimination and denial of services on the basis of race, color, national origin, sex, or handicap.**

Policies, practices, and procedures to be reviewed at the Chancellor's Office, California Community Colleges to include, but are not limited to the following:

- o Formulas for the distribution of funds;
- o Policies regarding access and admission to vocational programs;
- o Policies regarding counseling and guidance;
- o Policies regarding programs for the handicapped;
- o Policies regarding limited English proficient students;
- o Policies affecting equal opportunity for all students;
- o Work Experience, Cooperative Education and Apprenticeship programs.
- o Employment policies and practices;
- o Community College Board policies; advisory committee/council representation;
- o Grievance procedures, nondiscrimination policies, and practices;
- o Affirmative Action policies and procedures;
- o Policies regulating fiscal management;
- o Recruitment policies and practices;
- o Purchasing contracts and procedures;
- o Data gathering and information systems;
- o Contract awards; travel policies;
- o Facilities.

The review of internal state policies, procedures and selected programs shall be conducted every three years.

State-operated programs and institutions will be subject to the same review policy established for subrecipients in Sections V and VI of this MOA.

Practices and procedures to be reviewed at state-operated programs and institutions include, but are not limited to the following:

- o Policies and practices regarding limited English proficient students;
- o Policies and practices affecting equal opportunity for all students;
- o Grievance procedures, nondiscrimination policies, and practices;
- o Data gathering and information systems;
- o Instructional offerings;
- o Facilities.

Deficiencies will be reported to the Chancellor's Office, California Community Colleges and will be remediated through internal procedures and/or procedures adapted to subrecipient reviews. If a deficiency is not remediated the COCCC will develop a plan for remediation within an appropriate time line, and will follow-up within 90 days to ensure that action is being taken to remediate the deficiency. Deficiencies not remediated will be reported to the Office for Civil Rights.

SECTION V - SUBRECIPIENT COMPLIANCE REVIEW - AGENCY LEVEL

The Chancellor's Office, California Community Colleges, in compliance with the Vocational Education Guidelines, will establish procedures to:

1. Collect and analyze related data previously submitted to the Chancellor's Office.
2. Conduct periodic compliance reviews to identify practices by subrecipient which may be considered discriminatory.
3. Provide technical assistance for voluntary corrective action taken by subrecipient.
4. Provide on-going technical assistance to prevent actions by subrecipients that may be considered discriminatory.

A. Selection Process

The Chancellor's Office, California Community Colleges shall conduct an agency level (desk audit) review of 25% of the Local Educational Agencies (colleges) each year in cooperation and conjunction with the Vocational Education Office (four year cycle).

A Local Educational Agency (college) may be removed from review for a particular year and/or its place in the three year cycle may be determined in part by:

1. Dates of its previous reviews in earlier MOA cycles and related monitoring of Voluntary Compliance Plans.
2. Previous subject of a civil rights compliance review on the basis of race, color, national origin, sex, or handicap in vocational education within the previous three/four years.
3. Subject of pending litigation in federal or state courts due to allegations of discrimination on the basis of race, color, national origin, sex, or handicap which relate to the programs covered by the MOA.

Additional subrecipients may be selected for a desk audit review if :

1. COCCC staff have indicated that the practices of the subrecipient raises potential civil rights compliance problems.
2. Students, teachers, or other groups have filed complaints or grievances with the COCCC regarding the subrecipients practices and/or policies.
3. Civil rights agencies or state advisory committees have raised questions about a subrecipient and civil rights compliance issues.

After these ranking factors are considered, subrecipients will be scheduled for agency level (desk audit) reviews based on an approved schedule.

B. Notification To Subrecipient

The COCCC shall notify a subrecipient that it has been selected for a desk audit review no later than 30 days prior to the beginning of the review. Notification will be in the form of a letter and will outline how the selection was made and what procedures will be used in conducting the desk audit.

C. Information/Data Source

In conducting the desk audit review the COCCC will use the Vocational Educational Enrollment, Core Standards and Measure report as its primary source of data collection. Information and data to be gathered may include, but is not limited to:

- o Total enrollment by race, color, national origin, sex, and handicap at each college;
- o Enrollment by race, color, national origin, sex, and handicap in each vocational program at each college;
- o Number of LEP students enrolled at the college;
- o Number of LEP students enrolled in vocational programs at the college;
- o Number of Handicapped students enrolled at the college;
- o Number of Handicapped students enrolled in vocational programs by college;
- o Number of administrative and instructional staff by race, color, national origin, sex, and handicap at the college;
- o Number of administrative and instructional staff by race, color, national origin, sex, and handicap in vocational programs at the college; and,
- o Number of students by race, color, national origin, sex, and handicap in apprenticeship programs by each college.

Additional sources of information regarding subrecipients selected for the agency level (desk audit) review may include interviews and information regarding grievances and complaints from:

- U.S. Department of Apprenticeship Standards
- U.S. Department of Fair Employment and Housing
- U.S. Department of Education, Office for Civil Rights

D. Criteria For Findings

The COCCC has established statistical criteria and other information to be used in the selection of local educational agencies subject to a on-site review. These findings include:

1. Vocational Education programs that enroll students of one sex in substantially greater proportion (80% or better) than the other sex.
2. Vocational Education programs that enroll students of one race or national origin in substantially greater or lesser proportion than their representation in the service area.
3. Vocational Education programs that lack enrollment, or enroll only a small percentage of Limited English Proficient students.
4. Vocational Education programs that lack enrollment, or enroll only a small percentage, of handicapped students.

5. Vocational Education programs in which most of the students enrolled are of one race, national origin, or sex, or constitute a large proportion of handicapped students.
6. Vocational and/or regular programs in which there is a significant underrepresentation of minorities and/or females in administration and/or faculty.
7. High rate of complaints and/or significant noncompliance findings which may have an impact on vocational programs.
8. Apprenticeship programs that are exclusively or disproportionately of one race, color, national origin, or sex, or in which a proportionately small number of handicapped students are enrolled;

SECTION VI - SUBRECIPIENT COMPLIANCE REVIEW - ON-SITE

A. Selection Process

The COCCC will conduct an on-site review of those selected subrecipients that, on the basis of the agency level (desk audit) review, appear to have a higher probability of potential compliance problems. The COCCC may conduct an on-site review of randomly selected subrecipients as a means of identifying compliance problems that would be unlikely to surface during an agency level (desk audit) review.

A minimum of twenty-five percent (25%) of the Local Educational Agencies selected for an agency level (desk audit) review will be selected for an on-site review. The process for selecting the minimum 25% is based on a Chi Square analysis and Cramer probability scale that review all the data and information gathered and determines, in rank order, the Local Educational Agency (colleges) statistically most likely to be in non compliance in relation to students enrolled in vocational classes by race, color, national origin, sex, and handicap, as stated above. Additional information including a significant number of complaints or grievances from a specialized program or agency (as identified in Section VII-C) such as Handicapped, LEP, Counseling, Apprenticeship, etc., may also give cause for a subrecipient to be selected for an on-site review.

B. Notification to Subrecipient

The Chancellor's Office, California Community Colleges shall notify each subrecipient of the results of the agency level (desk audit) review. This notification will be no later than 30 days prior to the beginning of the review. Notification will be in the form of a letter and will outline the areas of statistical discrepancy including over and/or underrepresentation of targeted populations. Subrecipients will receive one of two letters that will state:

1. The statistical data and other information (if relevant) collected revealed evidence of disproportionate enrollments in vocational programs on the basis of race and/or national origin, and/or sex, and/or handicap, as specific problem areas that should be monitored and reviewed for possible discriminatory practices. The letter will further state that an on-site review will be scheduled in order that a team of consultants may conduct a review of the programs in question and practices and policies of the subrecipient to determine compliance with the Vocational Education Guidelines; or,

2. The statistical data collected revealed some or no evidence of disproportionate enrollments and/or disparities in enrollment figures, and/or other information (if relevant). Although there will be no on-site review, the subrecipient will be requested to respond to any potential noncompliance issues identified and to state plans for resolving and/or remediating any problem areas which are not successfully rebutted.

If the response from a subrecipient not selected for an on-site review is unsatisfactory and further correspondence is insufficient to resolve the problem, the subrecipient will also be scheduled for an on-site review.

C. Information/Data Source

After the "Letter of Intent" to conduct an on-site review has been issued from the Chancellor's Office, California Community Colleges a pre-visit will be arranged with the Local Educational Agency (college) to offer and provide information and materials to assist in preparation for the on-site review.

In conducting the on-site review, compliance review teams will observe, document, and interview faculty and students to determine the subrecipient's level of compliance with the Vocational Education Guidelines, and civil rights laws and regulations. The on-site reviews will include all problem areas in the agency level (desk audit) review as well as those areas in which problems can best be determined through an on-site review. Situations which may reflect areas of noncompliance include but are not limited to the following:

- o Lack of policy of nondiscrimination on the basis of race, color, national origin, sex, and handicap, and lack of notification of this policy to students, staff, community, etc;
- o Lack of notification and/or information regarding nondiscrimination in the language of the national origin minority population in the service area;
- o Lack of a Title IX and Section 504 coordinator(s) and lack of notification of name, address and telephone number of coordinator(s);
- o Lack of a grievance procedure for students and staff that provides due process for allegations of discrimination;
- o Failure to provide access for handicapped students to specific programs and to the district generally;
- o Programs with numerical or language stipulations for admission;
- o Counseling practices and procedures;
- o Relationships with apprenticeship programs, unions or other agencies providing training for careers and vocations;
- o Financial assistance programs including scholarships, etc.;
- o Ancillary services for handicapped students;
- o Comparable facilities including housing, where appropriate; and,
- o Placement of students in job opportunities.

E. Exit Interview

Upon identification of compliance issues and or questions, the on-site review team will conduct an 'Exit Interview' with the representatives of the Local Educational Agency (college) present to respond and discuss the preliminary findings. Subrecipients may provide additional supportive documentation on particular issues at that time and the findings may be adjusted. All items discussed in the Exit Interview will be the subject of the Letter of Findings.

F. Letter of Findings

Within 30 days of each on-site review, the Chancellor's Office, California Community Colleges will issue a Letter of Findings that indicates each issue that has been identified as in noncompliance with the Civil Rights Guidelines for Vocational Education. The letter will address all issues discussed during the Exit Interview, and the relevant Guidelines. The subrecipient will be requested to review the Letter of Findings and to develop a Compliance Plan whereby each of the noncompliance issues is addressed with a timeline and responsible person indicated in the resolution of each issue.

If the Chancellor's Office determines there is some evidence of noncompliance, but that evidence is insufficient to reach a determination of compliance or noncompliance with the legal requirements, the COCCC will resolve the issue either through further site investigation or through correspondence with the subrecipient. This issue may be included as an unresolved issue or concern in the COCCC Letter of Findings. If so, the subrecipient will be required to respond and either provide sufficient evidence for compliance, or appropriate action to be taken to achieve compliance.

G. Compliance Plan

The Local Educational Agency (college) receiving a Letter of Findings from the Chancellor's Office will be required to submit within 45 days of receipt of the Letter of Findings, a compliance plan that indicates the noncompliance issues involved in the on-site findings, the specific activities or services to be performed to resolve each issue, a timeline for resolution, and the individual to be responsible for meeting the timeline. If the violation appears relatively easy to correct, the subrecipient may describe the corrective measures and the means of implementation, within a specified timeline. If the violation(s) are extensive or complex, the subrecipient will submit a plan that describes in detail the steps it will take to remediate and/or resolve the violation and the timeline for implementation.

Unless it is not feasible for the subrecipient to do so, violations will be required to be remediated within a reasonable time given the nature of the violation. If a violation requires more than 90 days after acceptance of the compliance plan, the subrecipient will be required to identify interim steps to mitigate the effects of a longer timeframe.

If all avenues to reach compliance have been exhausted, the COCCC will notify the Office for Civil Rights as soon as it determines that it cannot secure compliance. If a subrecipient refuses to respond or refuses to submit a compliance plan without submitting legally sufficient evidence to rebut the noncompliance findings, the COCCC will refer the case to the Office for Civil Rights no later than 120 days after the issuance of the Letter of Findings (LOF) to the subrecipient. If the subrecipient submits a plan that is inadequate but is working in good faith to remedy the plan's deficiencies, the COCCC will notify OCR of the continuing negotiations. If an acceptable compliance plan still cannot be negotiated, the COCCC will refer the subrecipient to OCR within 180 days of the date of the Letter of Findings (LOF).

Completed compliance plans will be submitted to the Office for Civil Rights as a part of the annual compliance report. Additionally, completed compliance plans will be kept on file at the Chancellor's Office, California Community Colleges to be monitored until full compliance is established.

H. Follow-up

Within one year from the issuance of the Letter of Findings and implementation of the compliance plan, the subrecipient will be contacted and requested to supply documentation that each noncompliance issue listed has been resolved or remedied. The COCCC will continue to monitor noncompliance issues until all issues have been remedied or resolved.

SECTION VII - TECHNICAL ASSISTANCE

The COCCC will provide technical assistance to subrecipients and/or Local Educational Agencies (colleges) upon request. Technical assistance may include workshop presentations, seminars, telephone responses to questions regarding the Vocational Education Guidelines and civil rights regulations, and distribution of materials and sample forms to meet the Guidelines.

SECTION VIII - REPORT TO U.S. DEPARTMENT OF EDUCATION

The Chancellor's Office, California Community Colleges will submit an annual report to the Office for Civil Rights, describing its compliance activities for the year. The report will include the following:

1. Any modification to the MOA regarding staff authority, structure, and personnel, and a description of any changes in the procedures, data sources, or analysis plans described in the MOA.
2. Findings of that year's review of state operated agencies and/or state policies, and a description of any action taken by the state agency to amend and/or correct those actions, policies, procedures that may be out of compliance with the Civil Rights Guidelines for Vocational Education.
3. A listing and copy of the letter to each subrecipient receiving an agency level (desk-audit) review.
4. A listing and copy of the letter to each subrecipient receiving an on-site review describing the results of the review.
5. A listing of each subrecipient requesting technical assistance by district, issue, jurisdiction, type of assistance provided and whether the technical assistance was sent or provided on-site.
6. A listing and copy of the compliance plan of each subrecipient required required to complete one.
7. A listing of the follow-up activities for each subrecipient found in noncompliance in earlier year(s) whose corrective action had not been previously confirmed.
8. A listing of each of the subrecipients it has been found necessary to report to the Office for Civil Rights.

SECTION IX - TIMEFRAME

The annual report is due into the Office for Civil Rights no later than June 30th of the school year for which the above activities have taken place. The overall timeline of activities for the compliance activities associated with the Civil Rights Guidelines for Vocational Education is as follows:

July	Identification of internal or external consultant to implement the MOA.
August	Gather statistical data and other documents for 25% of the districts selected for Compliance Review by the COCCC.

September	Notify subrecipients of their involvement in an agency level (desk audit) review.
October	Review tapes, disks, data forms and other documents from colleges selected for desk audit review.
November	Select and notify subrecipients selected for an on-site review
December, January, February, March, April, May	Conduct on-site reviews; notify subrecipients of findings; provide technical assistance as necessary; conduct follow-ups of compliance plans for the prior year(s).
June	Submit annual report to the Office for Civil Rights.

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