

STATE OF WASHINGTON
Methods of Administration
Biennial Reports
December 31, 2020

TABLE OF CONTENTS

Secondary System Methods of Administration Report, 2018-2020
..... PDF Document Page 3

Postsecondary System Methods of Administration Report, 2018-2020
..... PDF Document Page 382



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 Methods of Administration between the dates of July 1, 2018 and December 31, 2020.

Part A: Staff Resources:

Identification of resources allocated to the MOA compliance program during each year of the reporting period.

2018–2019 School Year

| Staff Name | Staff Role | Outcome |
|-----------------|--|--|
| Deifi Stolz | Methods of Administration (MOA) Program Supervisor | Data review and subrecipient selection, in alignment with approved targeting plan. Conducted onsite reviews, prepared Exit Reports, Letters of Findings, and reviewed and approved Voluntary Compliance Plans in collaboration with subrecipients. Monitored subrecipients and helped them to come into compliance. Submitted Monitoring Letters of Closures to subrecipients. Worked with OSPI’s Information Technology department to develop an MOA electronic tool for onsite reviews and monitoring. Collaborated with OCR regarding case-by-case basis technical assistance and guidance to subrecipients. Served as agency and department contact for questions related to equity and access for CTE programs for schools and skill centers across the state. MOA NW Consortia bi-monthly conference calls, technical assistance support, and annual training conference. Participated in the national training at the MOA Coordinators’ Conference. |
| Rebecca Wallace | Career and Technical Education | Oversees the work of the MOA |

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| | Executive Director | Program Supervisor. Primary contact in working with OSPI's oversight agency, the Workforce Training Board. Primary contact in working with the State Board for Community and Technical Colleges with the Perkins team. |
| Samantha L. Sanders | Career and Technical Education Assistant Director | Assisted with four MOA Civil Rights onsite reviews and helped submit input to streamline the MOA process. |
| Doug Meyer | Career and Technical Education Program Supervisor | Assisted with three MOA Civil Rights onsite reviews. |
| Jill Pilbro | Career and Technical Education Administrative Support | Prepared MOA travel request documentation. Reviewed and edited MOA Exit Reports, Letters of Findings, and Voluntary Compliance Plans. |
| Greg Beck | EDS Application Development Director | Writes the business rules and extracts the pertinent data required as part of the approved MOA Targeting Plan in order to select subrecipients for review. |
| Sarah Albertson | Managing Attorney, Equity and Civil Rights | Consultant on Civil Rights technical assistance findings. |
| Timothy McNeely | Director, Consolidated Program Review (CPR) & Rural Education | Worked with IT to begin the process of adding MOA into the EDS Program Monitor Tool. |

General Resource Description: The resources used for the Methods of Administration are used for, but not limited to: data analysis, selection of subrecipients for onsite reviews, technical assistance to subrecipients and coworkers, policy reviews, onsite compliance reviews, professional development trainings, exit reports, letters of findings, voluntary compliance plan development and review, monitoring of subrecipients, closing out the monitoring of subrecipients, working with IT to develop an MOA electronic tool for onsite reviews and monitoring, participation and in MOA NW Consortia trainings, and the participation in the national training at the MOA Coordinators' Conferences.

| 2019–2020 School Year | | |
|------------------------------|--|--|
| Staff Name | Staff Role | Outcome |
| Deifi Stolz | Methods of Administration Program Supervisor | Data review and subrecipient selection. Conducted onsite reviews, prepared Exit Reports, Letters of Findings, and reviewed and approved Voluntary Compliance Plans in collaboration with subrecipients. Monitored subrecipients and helped them to |

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| | | <p>come into compliance. Submitted Monitoring Letters of Closures to subrecipients. Streamlined the MOA checklist, piloted three MOA subrecipients to upload documentation into the Consolidated Program Monitor Tool. Collaborated with OCR regarding case-by-case basis technical assistance and guidance to subrecipients. Served as agency and department contact for questions related to equity and access for CTE programs for schools and skill centers across the state.</p> <p>MOA NW Consortia bi-monthly conference calls, technical assistance support, and annual training conference. Participated in the Virtual Annual MOA Training Coordinators' Conference.</p> |
| Rebecca Wallace | Career and Technical Education Executive Director | Oversees the work of the MOA Program Supervisor. Primary contact in working with OSPI's oversight agency, the Workforce Training Board. Primary contact in working with the State Board for Community and Technical Colleges with the Perkins team. |
| Clarisse Leong | Career and Technical Education Operations Manager | Oversees the work of the MOA Program Supervisor. |
| Teri Lee | Career and Technical Education Administrative Support | Prepared MOA travel request documentation. Reviewed and edited Letters of Findings and Monitoring Letters of Closure. |
| Greg Beck | EDS Application Development Director | Writes the business rules and extracts the pertinent data required as part of the approved MOA Targeting Plan in order to select subrecipients for review. |
| Sarah Albertson | Managing Attorney, Equity and Civil Rights | Consultant on Civil Rights technical assistance findings. |
| Timothy McNeely | Director, Consolidated Program | Worked with IT to add MOA into |

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| | Review (CPR) & Rural Education | the EDS Program Monitor Tool with an approved MOA Civil Rights checklist and three pilot schools, two districts and one skill center. |
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General Resource Description: The resources used for the Methods of Administration are used for, but not limited to: data analysis, selection of subrecipients for onsite reviews, technical assistance to subrecipients and coworkers, policy reviews, onsite compliance reviews, professional development trainings, exit reports, letters of findings, voluntary compliance plan development and review, monitoring of subrecipients, closing out the monitoring of subrecipients, streamlining the MOA checklist, piloting three MOA subrecipients to upload documentation into the Consolidated Program Review Program Monitor Tool, participation in MOA NW Consortia trainings, and the participation in the national training at the MOA Coordinators' Conferences.

Part B: State Agency's Compliance:

Description of OSPI's compliance with Section II(A) of the *Guidelines* (relating to distribution of funds, admissions and administration, approval of local entity action, and conducting state-run programs.)

On September 18, 2020, the U.S. Department of Education approved OSPI's [Methods of Administration State Plan](#) to protect the civil rights of all CTE students consistent with the requirements of MOA to prevent, identify, and remedy discrimination in CTE programs.

OSPI administers all federal funds in alignment with the state plan, and all state and federal requirements including, but not limited to;

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin*;
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex*;
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability*;
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability*;
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

All recipients of federal funds attest to and assures compliance with the above federal Civil Rights statutes and regulations.

As part of the process monitoring subrecipients through the formal processes of the Perkins application process, the Consolidated Program Review, and program evaluations, as well as the informal processes of providing technical assistance, OSPI ensures that CTE programs are accessible, and unlawful discrimination does not take place. We ensure all state agency compliance requirements are met to maintain the authority to conduct state-run programs.

Components of Monitoring

The Biennial Report reflects the subrecipients selected for review from the approved Targeting Plan by the U.S. Department of Education Office for Civil Rights.

Part C: Subrecipients:

A list of subrecipients for which OSPI conducted compliance reviews.

2018–2019 School Year

| Subrecipient (District/Skill Center/Tribal School) | Method (Desk/Onsite) |
|--|---|
| Selah School District (Selah High School, Selah Academy) | Onsite Review: January 23–25, 2019 |
| Spokane 2 (Lewis & Clark High School, North Central High School) | Onsite Review: February 5–7, 2019 Did not complete the review due to inclement weather. Set up and conducted second MOA onsite review during March 20–21, 2019 |
| Edmonds 1 (Edmonds–Woodway High School, Scriber High School) | Onsite Review: February 26–March 1, 2019 |
| Enumclaw School District (Enumclaw High School, Enumclaw Middle School, Aquatics Center, Thunder Mountain Middle School) | Onsite Review: March 12–15, 2019 |
| Skykomish School District (Skykomish High School) | Onsite Review: April 11–12, 2019 |
| Renton 2 (Renton Academy, Renton High School) | Onsite Review: April 17–19, 2019 |
| Renton 1 (Hazen High School, Lindbergh High School) | Onsite Review: April 24–26, 2019 |
| Bainbridge Island School District (Bainbridge High School, Eagle Harbor High School Commodore Options School, Woodard Middle School) | Onsite Review: April 29–May 2, 2019 |
| Mansfield School District (Mansfield Junior High/High School) | Onsite Review: May 22–23, 2019 |

2019–2020 School Year

| Subrecipient (District/Skill Center/Tribal School) | Method (Desk/Onsite) |
|---|---|
| Orting School District (Orting High School, Orting Middle School) | Onsite Review: February 18–20, 2020 Pilot district selected to use the Consolidated Program Review Monitoring Tool. |
| Chehalis School District (W.F. West High School) | Onsite Review: February 25–27, 2020 Pilot district selected to use the Consolidated Program Review Monitoring Tool. |
| Puget Sound Skill Center | Onsite Review: Scheduled for March 10–12, 2020 Pilot skill center selected to use the Consolidated Program Review Monitoring Tool. |

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| | <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal gave a directive not to travel in King and Snohomish counties.</p> <p>Reviewed what was submitted in the CPR Program Monitor Tool to determine compliance.</p> |
| Touchet School District (Touchet High School) | <p>Onsite Review: Scheduled for March 24–26, 2020</p> <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal closed all 295 school districts for six weeks.</p> <p>In the spring of 2020, the Office of Superintendent of Public Instruction (OSPI) temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.</p> <p>October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: B083–20 Executive Services</p> |
| Meridian School District (Meridian High School) | <p>Onsite Review: Scheduled for April 1–3, 2020</p> <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal closed all 295 school districts for six weeks.</p> <p>In the spring of 2020, OSPI temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.</p> <p>October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: B083–20 Executive Services</p> |
| Soap Lake School District (Soap Lake High School) | <p>Onsite Review: Scheduled for April 14–16, 2020</p> <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal closed all 295 school districts for six</p> |

| | |
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| | <p>weeks.</p> <p>In the spring of 2020, OSPI temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.</p> <p>October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: B083–20 Executive Services</p> |
| <p>Mary Walker School District (Mary Walker High School)</p> | <p>Onsite Review: Scheduled for April 28–30, 2020</p> <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal closed all 295 school districts for six weeks.</p> <p>In the spring of 2020, OSPI temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.</p> <p>October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: B083–20 Executive Services</p> |
| <p>Liberty School District (Liberty High School)</p> | <p>Onsite Review: Scheduled for May 12–13, 2020</p> <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal closed all 295 school districts for six weeks.</p> <p>In the spring of 2020, OSPI temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.</p> <p>October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: B083–20 Executive Services</p> |
| <p>Washtucna School District (Washtucna High School)</p> | <p>Onsite Review: Scheduled for May 20–21, 2020</p> <p>March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee and State Superintendent Reykdal closed all 295 school districts for six</p> |

weeks.

In the spring of 2020, OSPI temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.

October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: [B083–20 Executive Services](#)

Part D: Results

Copies of any written findings or compliance plans issued. Detailed reports are included.

MOA Exit Reports

2018-2019

- Selah School District
- Edmonds 1
- Enumclaw School District
- Spokane 2
- Skykomish School District
- Renton 1 & 2
- Bainbridge Island School District
- Mansfield School District

2019-2020

- Orting School District
- Chehalis School District

MOA Letters of Findings

2018-2019*

The following subrecipients Letter of Findings were included in the 2016-2018 Biennial Compliance Report Supplemental to OCR on April 12, 2019.

- Stanwood-Camano School District (Stanwood High School, Lincoln Hill High School, Stanwood Middle School)
- Lopez Island School District (Lopez Island High School)
- Pierce County Skill Center

2019-2020

- Bethel 1 (Bethel High School, Graham-Kapowsin High School)
- Bethel 2 (Spanaway Lake High School, Challenger High School)
- Selah School District (Selah High School, Selah Academy)

MOA Voluntary Compliance Plans

2018-2019*

The following subrecipients Letter of Findings were included in the 2016-2018 Biennial Compliance Report Supplemental to OCR on April 12, 2019.

- Stanwood-Camano School District (Stanwood High School, Lincoln Hill High School, Stanwood Middle School)
- Lopez Island School District (Lopez Island High School)
- Pierce County Skill Center

2019-2020

- Bethel 1 (Bethel High School, Graham-Kapowsin High School)
- Bethel 2 (Spanaway Lake High School, Challenger High School)
- Selah School District (Selah High School, Selah Academy)

MOA Monitoring Letters of Closure

2019-2020

Issued September 25, 2020

- Centralia School District
- Chehalis School District
- East Valley (Spokane) School District
- Highline School District (Host District) for the Puget Sound Skills Center
- Liberty School District
- Lynden School District
- Mary Walker School District
- Meridian School District
- North Kitsap School District
- North Thurston School District
- Orting School District
- Riverside School District
- Soap Lake School District
- Toppenish School District
- Touchet School District
- Washtucna School District

Issued September 28, 2020

- Bainbridge Island School District
- Bethel School District
- Bethel School District (Host District) for the Pierce County Skills Center
- Cashmere School District

- Edmonds School District
- Enumclaw School District
- Lake Chelan School District
- Lopez Island School District
- Mansfield School District
- Renton School District
- Selah School District
- Skykomish School District
- South Kitsap School District
- Spokane School District
- Stanwood-Camano School District

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.

Professional Development Conferences

WA-ACTE Summer Conference

Session: CPR, MOA, and Perkins

Monday, August 6, 2018

OSPI Office Hours and Staff available for technical assistance during conference

WA-ACTE Summer Conference

Session: Preparing for Your CPR or MOA Review? What You Need to Know.

Monday, August 4, 2019

OSPI Office Hours and Staff available for technical assistance during conference

WA-ACTE Summer Conference

Session: MOA Changes and Resources

Monday, August 3, 2020

OSPI Office Hours and Staff available for technical assistance during conference

MOA Civil Rights and Equal Access to CTE Technical Assistance Zoom Meetings

Tuesday, September 22, 2020

2–3 PM

Tuesday, October 20, 2020

3–4 PM

Thursday, October 22, 2020

3–4 PM

Tuesday, November 17, 2020

3–4 PM

Tuesday, December 8, 2020

11–12 PM

Resources Available for Technical Assistance

OSPI's CTE website: <https://www.k12.wa.us/student-success/career-technical-education-cte>

- CTE Resources website: <https://www.k12.wa.us/student-success/career-technical-education-cte/cte-resources>
- Methods of Administration website: <https://www.k12.wa.us/student-success/career-technical-education-cte/cte-resources/methods-administration-moa-civil-rights-onsite-reviews>

OSPI's Equity and Civil Rights website: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights>

OSPI's Special Education website: <https://www.k12.wa.us/student-success/special-education>

Phone Calls & Emails

Respond to subrecipients who request assistance throughout the year.

Optional: Feedback to Federal Civil Rights Resources.

The following websites and webinars have been helpful in researching and obtaining information that directly impacts MOA compliance:

U.S. Department of Education Office for Civil Rights Policy Guidance Portal website:

<https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/index.html>

U.S. Department of Education Office for Civil Rights Reading Room website:

<https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/index.html>

U.S. Department of Education Office for Civil Rights Frequently Asked Questions website:

<https://www2.ed.gov/about/offices/list/ocr/faqs.html>

U.S. Department of Education Office for Civil Rights Reports and Resources website:

<https://www2.ed.gov/about/offices/list/ocr/reports-resources.html>

Perkins Collaborative Resource Network (PCRN) MOA website:

<https://cte.ed.gov/legislation/methods-of-administration>

U.S. Department of Education Office for Civil Rights Outreach, Prevention, Education and Non-discrimination (OPEN) Center is aimed at supporting schools, educators, students and families in proactively complying with federal nondiscrimination laws. The Open Center's role is to field questions and to create technical assistance materials, create webinars, training materials and presentations. The

OPEN Center attorney's focus is on proactive compliance with federal civil rights laws and offers a dedicated team for education, prevention, and outreach. Inquiries can be sent to: OPEN@ed.gov

U.S. Department of Education Office for Civil Rights Short Webinar: How to File an OCR Complaint: <https://youtu.be/BuwVa3JJE-4>

This webinar describes who can file a discrimination complaint with OCR, the four ways in which one can file a complaint, and the type of information that must be provided in the complaint.

Other Beneficial OCR Webinars:

- [OCR 100: An Introduction to Federal Civil Rights Protections in Education](#)
- [OCR Short Webinar on Updates to Perkins and Methods of Administration Programs](#)
- [OCR Short Webinar on Sexual Violence in Public Schools](#)
- [OCR Short Webinar on Online Education and Website Accessibility](#)
- [Students with Disabilities and the Use of Restraint and Seclusion in K-12 Schools](#)

Part D: Results

MOA Exit Reports 2018-2019

The following subrecipients received an MOA Civil Rights onsite review and MOA Exit Report during 2018-2019.

- Selah School District
- Edmonds 1
- Enumclaw School District
- Spokane 2
- Skykomish School District
- Renton 1 & 2
- Bainbridge Island School District
- Mansfield School District

Selah School District
MOA Civil Rights Onsite Review Exit Meeting Notes
January 25, 2019 | 3-4 PM

Thanked the Selah School District team for their hospitality.

I have provided Frank Reno with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links

The following information is not inclusive of all the areas measured or areas that will be addressed in the Letter of Finding.

Facilities Accessibility | Selah High School

1. Door pressure (5 pounds of pressure maximum) – Ranges from 5-15+ pounds
2. Unwrapped sink pipes
3. Eyewash stations (not a system in place for testing, no proper drainage (bucket used in one room), emergency shower handles too high, 65 inches). They are extremely dirty. Need to flush the lines weekly. OSHA Fact Sheet regarding Amebae.
4. Accessible restrooms do not have accessible signage that includes the International Symbol for Disability. Not tactile. Does have braille.
5. Both Girl's and Boy's Locker Rooms have benches that are not accessible to the lockers. Rows measured 22-24 inches.
6. Both Girl's and Boy's Locker Rooms have a drinking fountains that are protruding objects (more than 4 inches from the wall) and have broken handles.
7. Boy's signage indicates Room 205 and Mr. Ditter underneath. Braille. Doesn't indicate Boy's Locker Room.
8. Boy's Locker Room has a designated accessible stall. However, the door swings in which makes the toilet inaccessible. No turning radius for a wheelchair.

Note: Good to see there were accessible showers in both locker rooms.

9. Drinking fountains are protruding objects. More than 4 inches from the wall.
10. Paper Towel Dispenser handles exceed the maximum reach range of 48 inches. Range 51-73 inches
11. Basement Staff Lounge restrooms are not accessible. Counter top is 36 inches.
12. Elevator gap from floor to floor varied. First floor 1 7/8 inch gap. Second floor 1 ¾ inch gap, Third floor 1 ½ gap. The maximum gap width allowable is 1 ¼ inches.
13. Elevator audible not consistent floor to floor.

14. Greenhouse has accessible path of travel. There are 8 worktables that measured 34 ½ inches at the bottom and 36 inches at the top. Need to have a worktable with a maximum height of 34 inches at the top and 27 inches minimum at the bottom.
15. Thor Concessions. The counter is 36 inches. There is no forward approach for wheelchair access. The sink area appeared to be 36 inches, with proper level handles. Chris will take pictures and measurements due to students working and serving other students.
16. Fixed seating in some of the classrooms (101, 102, 103, 105, 106. Need to add an adjustable table.
17. Cafeteria tables do not allow for wheelchair access. The end cap, seat to seat, 26 inches.
18. Wrestling Room has a mat. Ground floor to mat is 2 inches. Must have transition as the lip is too high.
19. Food Lab has counters that are 36 inches high.
20. Metals Shop and Wood Shop does not have Safety Striping on the floor.
21. Metal and Wood Shop need to provide tools at accessible reach range of 40-48 inches.
22. Metal Shop welding station, helmets, coveralls too high.
23. Metal Shop restrooms are not accessible.
24. Metal Shop has some equipment that is mobile. Currently the equipment is placed so as to make coveralls and helmets not readily accessible.
25. Metal Shop equipment modifications have been made to make several areas accessible.
26. Wood Shop is very neat and tidy.
27. Library has stacks with varied measurements, 30-33 ½ inches.
28. Health Room has a restroom that is not accessible. Counter and sink 36 inches. Need to provide a clear path of travel to the bed.
29. Ramp to Portables 5 & 6 has a portion of the incline slope that measured above 8.33 percent.
30. Parking lot in front of Portables does not have an accessible parking space or accessible signage.
31. There are designated accessible parking just below the visitor parking that doesn't meet compliance. There are not access aisles and it was striped as such would be in traffic.
32. The accessible parking spaces (should be 96 inches minimum) and access aisles (60 inches) are not the correct measurements, not properly marked and do not have accessible signage. There is also no van accessible parking space (132 inches) or signage. This area will need to be reconfigured and restriped to include the International Symbol for Accessibility on the pavement as well as on the ADA accessible signage.

Note: Frank initially reported on the High School parking lots. He will send the parking lot measurements.

**Selah Academy | Date of Construction 1976 | Gym 1976 | Ramp Constructed 1976
(Frank will check to see about remodel dates and what was done)**

1. The ramp at the very top measure at 9.1% slope. The maximum allowable slope incline is 8.33%.
2. The distance from classroom the Gym restrooms is 470 feet. Must go out into the elements. Not acceptable.
3. The Gym Women's and Men's restrooms are not accessible. The door width is 27 ½ inches. Wall to partition is 25 inches in the Women's Restroom.
4. Door pressure ranges from 6-16 pounds of pressure.
5. Staff restroom, located in the Preschool area, has Accessible Signage. The Unisex Restroom is not accessible. Need to either remove the International Symbol for Accessibility on the existing signage, or make a new sign and hang.

School District | Remodeled April 2016 | Technical Assistance Provided to Bring Into Compliance | Frank Reno Will Take Action and Bring Into Compliance

Signage to restrooms need to have International Symbol for accessibility.

Hi | Low Drinking Fountains are a protruding object.

Main Office counter height exceeds 34 inches. Provide Hi/Low option.

Counseling Office

There are no Spanish publications available in the Counseling Office.

The Registrar was not aware of any publications being available in Spanish.

Lots of YV Tech and military brochures

College in the High School handouts, etc.

Services for EL Students

There are lots of services at the Elementary, however in the education progression, less is provided.

Need to provide additional resources.

Need to let EL students know about CTE courses/classes as a viable option in career exploration and to learn 21st century skills.

Reported on student focus groups.

Students feel safe. Teachers are supportive, care about them and do all they can to help them graduate. Would like to have equal recognition for those who don't do sports. Would like to have Open Campus for Seniors or consider Special Days for this to happen. Brought up food and also portion size. The grading system is confusing. Need to provide additional resources. CTE classes and programs have benefitted the students and have provided a career pathway option for some students. Involvement in CTSOs have provided them with 21st century skills and leadership skills. Proud to be a part of the Selah community.

Selah Academy is a safe place where you are accepted as you are. Mr. Coscarart is amazing! No one sits alone. Support one another and individual journey. Get to work at own pace. Teachers are very accommodating, respectful, caring and encourage you to be your best and to keep you focused. Peaceful and helpful for those who have anxiety. Drug testing and services have benefited them greatly. Access to credit summary. Several students have had a difficult life and truly believe the school, teachers and principal have saved their lives. Life-long connections. Would like to have a Pool Table.

Reported on some of teachers concerns. (safety, monitoring of students, grading system, need for computers, etc.)

Betty Lopez to provide additional documentation.

Frank has asked Chris to provide pictures and measurements of the following areas:

1. Thor Concessions
2. Weight Room
3. Band Room
4. Choir Room

Administrative Finding

Annual Nondiscrimination Notification

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. District has 90 days to submit a Voluntary Compliance Plan (VCP). I will send VCP template. Need to indicate who is responsible for each finding. Need to indicate month and year for each finding. The maximum timeframe for corrective action items is two years. District to show due diligence. I asked that I be a part of the draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. Submission of photographic evidence and documentation.
4. It is a partnership. Please email or call with questions. I'm here to assist throughout the process.

Deifi Stolz

Program Supervisor

Methods of Administration

Office of Superintendent of Public Instruction

PO Box 47200

Olympia, WA 98504-7200

Edmonds School District

MOA Civil Rights Onsite Review Exit Meeting Notes

March 1, 2019 | 4-5 PM

Thanked the team for their hospitality.

I have will provide Matt Finch and Mark Madison with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

The following information is not inclusive of everything observed or noted:

Administrative

1. The Annual Nondiscrimination Statement has not been done.
2. Comprehensive Nondiscrimination Statement. There is inconsistency with what is published and disseminated.

The following information is not inclusive of all the areas measured or areas that will be addressed in the Letter of Finding.

Facilities Accessibility | Edmonds-Woodway High School

1. Main Parking Lot has 21 spaces. Four are accessible. None of which are designated as van accessible. The accessible aisles: AA1 is 46 inches and AA2 is 47 inches. Accessible Aisles are to be 60 inches wide minimum.
2. Main Parking Lot accessible signage is too low. Ranges 49 bottom to 67 top of the sign. From the ground floor to the bottom of the sign is a minimum of 60 inches.
3. The west side of the north end entrance has a lift in the sidewalk from the curb cut ranging from 1-1/2 inches. There is a second area of the sidewalk that has a lift of ¾ inches.
4. Staff and Student Parking Lot has accessible signage is too low. Ranges 49 bottom to 68 ½ inches top of the sign. From the ground floor to the bottom of the sign is a minimum of 60 inches.
5. Main Entrance doors have a key fab setup on the left and the automatic door opener on the right. Time: 23 seconds open to close.
6. Health Room in the Main Office has braille and tactile signage covered by storage cabinet.
7. Door pressure (5 pounds of pressure maximum) – Ranges from 5-20+ pounds.
8. Water fountain pressures 3-10 pounds of pressure.
9. Coat hooks ranges 43-58+ inches.

10. Eyewash stations (not a system in place for testing, no proper drainage (bucket used in one room), emergency shower handles too high, 65 inches). They are extremely dirty. Need to flush the lines weekly. OSHA Fact Sheet regarding Amebae.
11. A few of the accessible restrooms do not have accessible signage that includes the International Symbol for Disability. Both Girl's and Boy's Locker Rooms have benches that are not accessible to the lockers.
Rows measured 22-24 inches.
12. The Women's Locker Room restrooms have latches that are missing; Accessible stall and 2 other stalls.
13. Both Girl's and Boy's Locker Rooms have a drinking fountains that are protruding objects (more than 4 inches from the wall).
14. Boy's Locker Room has a designated accessible shower. There is no privacy shower curtain. Being used for scale and clothes.

Note: Good to see there were accessible showers in both locker rooms.

15. Drinking fountains are protruding objects. More than 4 inches from the wall.
16. Paper Towel Dispenser handles exceed the maximum reach range of 48 inches. Range 51-73 inches
17. Student Store has a register counter of 41-43 inches. There is no forward approach for wheelchair access. There is a lower counter measuring 32-33 ½ inches, with a 19 inch width underneath that is too narrow. The reach range is 40-48 inches and the only items in that reach range are the Gold Fish on the chips and snacks racks.
18. Classroom table aisle configuration ranges: 18-32 inches.
19. The Great Hall tables (round and rectangular) do not allow for wheelchair access. The benches do not have ADA accessible cutouts for wheelchairs.
20. Wrestling Room has a mat. Ground floor to mat is 1 1/2 inches. Must have transition, as the lip is too high.
21. There are adjustable tables in most of the rooms. However, the range is 26-28 inches at the bottom to 28-30 at the top.
22. The Theater has two areas on the sides, in the main paths of travel to seating up stairs. One side has a cabinet and two chairs (remove to allow more access). The other side has room for one wheelchair and companion seating.
23. There is railing at the stage entrance by stair and the sliding wall with a clearance of 25 inches.
24. Chef School has counters that are 36 inches high. There is no forward approach. 60 inches to the microwave handles. There are working prep tables at 35 ½ at the top. They are on wheels (5 inches).
25. Library has a Search Area with three stations with counter heights of 36 inches.

Counseling and Career Center

1. The Career Center does not have any publication other than English.
2. The Counseling Center had a couple of publications in Spanish.

Edmonds-Woodway High School Interviewee Comments

1. Safety of teachers and students
2. School should have been in lock down last year, but wasn't
3. Need of additional monitoring of students
4. Would like more opportunity to interact with students vs. paperwork
5. Grading system can be difficult
6. Need for computers
7. Recommend having a mandatory, introduction to computers class for all students.
8. Consider enforcing a stricter cell phone policy.
9. Skyward is only available in English.
10. Would like to have opportunities to train families on how to access Skyward on multiple occasions.
11. Need to include Free and Reduced form in welcome and registration packet to avoid stigma.
12. Offer more classes for EL students besides offering three classes of PE during the day.
13. There is push back for EL students who would like to take Computer Sciences classes or Robotics
14. Do not have appropriate level of math for EL students. Algebra is the lowest level of math offered and students flounder.
15. Communication breakdown from the district to school buildings and staff.
16. Building staff will make recommendations and then asked to do the research and give back to district. Would like division of labor, support and resources.
17. Not aware of who is specifically responsible to take care of civil rights complaints at the building level. Not clear about what the district does.
18. There are not many IB students in CTE classes. Changes the dynamic.
19. Student CTSO involvement provides leadership opportunities. Regional, state and national competitions. Great experience and learn life-long skills.
20. Students able to drop classes at any time in order to participate in E-Learning.
21. E-Learning is a mystery.
22. Receive 504 and IEP information in a timely manner. Skyward is helpful tool as well.
23. Teachers are proactive with 504 and IEP students.
24. Have many students with lots of needs. Additional para support would be helpful.
25. Use Google translate for students who do not speak English.
26. Appreciate bringing ideas to the table.
27. Collaborative teaming with teachers.
28. Great community.
29. Feel very supportive through CTE.
30. Able to talk with administrators.
31. Consistently looking at how to make things better.
32. Keeping the students in mind with systemic change.
33. Cultural Literacy and Competency is ongoing.
34. Building on Equity and Diversity.

Student Focus Group at Edmonds-Woodway High School

Comments:

- Students feel welcomed and safe
- Inclusiveness
- Teachers are approachable
- Teachers don't give up on students.
- Teachers set you up for success.
- Teachers are supportive, care about them and do all they can to help them graduate.
- Appreciate teachers making time for students after school
- Would like to have equal recognition for those who don't do sports.
- Teachers are respectful. Trust.
- Counselors are more involved with the students. Freshman commented: "I thought I was in trouble when asked to see the counselor, but was asked how things were going for me?"
- Drop off bus used for swimmers. Can get you there but have to find a way home.
- Elitist mentality between IB over Running Start students
- Not sure of HIB process or where to find policies.
- School spirit and school pride tends to drop off significantly after Homecoming
- Racial and homophobic slurs said and heard in the hallways
- Overwhelming to have 30 students in English class
- People from other countries find it difficult to get to know others
- Not equal representation of sports. Football and basketball receive full recognition, publicity, announcements, transportation. Not so for golf, wrestling, swimming, etc.
- Open Campus for those students in good standing and with parent permission
- Proud of the music program.
- Lots of clubs
- Community support
- Different groups are represented well: BSU, Rainbow Warriors
- Enjoy new progressive class of Senior History: Ethic Studies

Things they would like to see changed:

- Include EL students in all activities
- Smaller class sizes
- Have additional opportunities to share about the various clubs
- Increase school pride and school spirit
- Have broader activities during Spirit Week, etc.
- Transportation for all sports
- Give attention other sports besides football and basketball
- Advisory. Inconsistent from one advisory class period to another with passes.
- Have access to doors being open when returning from lunch instead of having to walk all the way around to the front of the building
- Girls locker rooms have the locks removed, except for one
- During lunch, have more than the F restrooms open.

Facilities Accessibility| Scriber Lake High School

1. Staff Parking lot has accessible signage 53 ½ at the bottom and 71 ½ at the top. Needs to be a minimum of 60 inches at the bottom of the sign.
2. The distance to travel from the VOICE assessable parking space to the Main office is 484 feet.
3. Main Office area only has one Staff Restroom that is also used for transgender students.
4. Paper towel dispensers 52 inches.
5. Registrar Counter is 43 inches high.
6. Building H Entrance. Automatic Door Opener not working.
7. Culinary. There is no forward approach. Paper towel handle 54 inches. Soap Dispenser 54 inches.
8. The distance from classroom the Gym restrooms is 470 feet. Must go out into the elements. Not acceptable.
9. The parking lot striping of not accurate.
10. The Boys and Girls Locker Rooms are being used for storage.
11. Girls Locker Room has a piano that could be used for the students.
12. The Boys Locker Room has Carpentry equipment that can be used for students.
13. Weight room has a 1-1 ½ lip.
14. There is an accessible Greenhouse that isn't being used. Work Adjustment program.
15. Students are dropped off at the bottom of the hill and need to climb 126 stairs.
16. The school is the furthest SW corner away from district services.
17. Students provided Intercity bus passes. It takes students one to two hours to get to school.
18. Access to the auditorium is limited to one hour Monday through Thursday.
19. The gymnasium is shared with Edmonds Heights. Use of half the gym.

Scriber Lake High School Interviewee Comments

1. Scriber Lake High School was moved to this location, was an old high school, and supposed to be a transition site for two years. Scriber Lake High School has been at this site for 14 years.
2. Big barriers are lack of district transportation, student attendance, safety, adequate mental health services, resources, updated textbooks, hands-on course offerings.
3. Students have severe skill deficit in reading, writing and math.
4. Students are referred here often from neighboring districts through variance waiver.
5. Concerns about heat or lack of in the buildings.
6. In the Main Office area, there is only one bathroom for all staff. Used also for transgender students.
7. LSHS is an intervention school due to students being extremely credit deficient. However, the district considers it a comprehensive high school.
8. LSHS has the Intensive Life Skills Program with the least safe facility in the district.
9. Saturation of students with IEPs. Difficult. Would like to attract a broader spectrum of learners.
10. Counting credits correctly.
11. Offer very few electives. Would like to have CTE hands-on learning opportunities.
12. Have offered, on occasion, offer Mini Courses (1 week intensive: Cheese-making, Robotics, Sewing).

13. Great having a Student Support Advocate. Would like to keep after finally receiving one after requesting for several years.
14. No consistency with behavior or discipline for students. Behavior team in place.
15. STEP program is only a partial day. All students should have access to a full day of classes. Have to refer students.
16. Delighted CTE Chef is offered this year, but only for two quarters.
17. There is a CTE teacher who is willing to assist students with CTE classes.
18. Boys Locker Room has CTE equipment being stored and not used.
19. Girls Locker Room has a working piano being stored by the restrooms.
20. Not putting every student who qualifies for SPED in classes they qualify for with IEPs. 45 students qualified for math. There is only one SPED math class available and the maximum enrollment is 22 students.
21. Need for paras to assist with students vs. breaking teachers and other paras with breaks in order to allow for time in order to get ready to go to worksite with students.
22. Life Skills students find it difficult to get into elective classes. They end up auditing the class for experience.
23. Students would greatly benefit from standing up, move to stations and doing projects.
24. Students have many struggles and staff are fully engaged with them offering support, coping mechanisms and tools.
25. Able to work with at risk youth, encourage them, and eventually get them to graduate.
26. OSPI provides graduation support

Student Focus Group at Scriber Lake High School

Comments:

- Great teachers who are very supportive and respectful
- Teachers really care and want you to succeed
- Teachers help students with strengths, talents and abilities
- 1:1 opportunities with teachers
- Small classes
- Great opportunity to restart and get ahead
- Librarian is very friendly and nice
- Staff work quickly to resolved issues
- Have very limited electives (2 Art, 1 Chef)
- No music
- No sports
- Have to walk outside of the building to get to different classes
- Have to take Intercity transit, 1-2 hours to get to SLHS

Things they would like to see changed:

- School transportation provided
- Additional electives
- Opportunity to have hands-on learning experiences.
- Chef's Class for more than one offering. Share with the younger children.
- Able to use greenhouse

- Additional Science offerings. Could do so much more. Currently, one teacher. Furthermore, the Arts Room is in the Science Room.
- Permanent math teacher. Changes every quarter.
- More Arts: Music, Instruments, Piano
- Language classes offered
- Use of the field beyond running two laps and back into the building
- Sports offered
- Workout Club
- Student Store
- Foosball Table

Counseling and Career Center

1. Career Center only has publications in English.

Services to EL Students

EL Director: Would like to meet with Mark Madison discuss additional access opportunities to CTE course offerings beyond Chef and Carpentry.

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. District has 90 days to submit a Voluntary Compliance Plan (VCP). I will send VCP template. Need to indicate who is responsible for each finding. Need to indicate month and year for each finding. The maximum timeframe for corrective action items is two years. District to show due diligence. I asked that I be a part of the draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. Submission of photographic evidence and documentation.
4. It is a partnership. Please email or call with questions. I am here to assist throughout the process.

Deifi Stolz

Program Supervisor

Methods of Administration

Office of Superintendent of Public Instruction

PO Box 47200

Olympia, WA 98504-7200

Enumclaw School District

MOA Civil Rights Onsite Review Exit Meeting Notes

March 15, 2019 | 3-4 PM

Thanked the team for their hospitality.

I will provide Mike Nelson, Kim Herd, and Pete French with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

I also mentioned after a conversation with Mike, that I spoke with Rebecca Wallace, Washington State's CTE Executive Director, about asking OSPI leadership to share at superintendent's meetings and other meetings regarding the purpose of MOA Civil Rights onsite reviews, the process, standards that apply, and that districts could be notified of being selected depending on the selection criteria.

The following information is not inclusive of everything observed or noted but will provide insights.

Administrative

1. The Annual Nondiscrimination Statement was not been submitted to the community and placed on the district's website this school year or in previous years.

The following information is not inclusive of all the areas measured or areas that will be addressed in the Letter of Finding.

Facilities Accessibility | Enumclaw High School

1. Main Parking Lot has six parking spaces indicated as accessible. One of the accessible aisles measured 48 inches. Access aisles are to be 60 inches wide minimum.
2. Main Parking Lot accessible signage is too low. Ranges 43 inches at the bottom of the sign to 64 3/4 inches to the top of the sign. From the ground floor to the bottom of the sign is a minimum of 60 inches. One sign is missing by the North Commons entry.
3. South Student Parking Lot accessible signage is too low. Ranges 41 3/4 inches at the bottom of the sign to 59 3/4 inches to the top of the sign.
4. Door pressure exceeds 5 pounds of pressure maximum – Ranges from 5-18 pounds.
5. Drinking fountains indicate 5-10 pounds of pressure.
6. Drinking fountain arcs measure 2-8 ½ pounds of pressure.
7. Eyewash stations (not a system in place for testing). Need to flush the lines weekly. OSHA Fact Sheet regarding Amebae.

8. Room 256 eyewash station spout is not opening all the way. No testing tag.
9. Woodshop reach ranges for tools 48-55 inches.
10. Emergency Shower handle height measured 67 inches in Auto Shop.
11. Auto Shop classroom aisle configuration of 25 to 27 1/8 inches in width.
12. Safety striping is faded or very faint in the Auto Shop.
13. First Aid Kit is a protruding object (more than 4 inches from the wall) and measured 71 inches to the latch in the Auto Shop.
14. Some classroom desk or workstation aisle configurations ranges 16, 19 ½, 22, 25, 29, 31, 49 1/2 inches.
15. Classrooms counter top height of 36 inches. No forward approach.
16. No forward approach in Culinary to student workstations. Floor ground to pipe measured 19 ½ inches. Knee clearance minimum of 27 inches with a maximum counter height of 34 inches.
17. Culinary: Utensils height 62 inches, spices height 55 ½ inches, bread boards height 77 inches, apron hooks height 62 inches
18. Dishwasher area height ranges 34 ½ to 37 ½ inches. No forward approach.
19. Wash, Rinse, Sanitize area top counter height of 38 inches with a bar at the bottom measurement of 8 ½ inches. No forward approach.
20. Paper towel dispenser height ranges 50 ½ to 56 inches.
21. Soap dispenser height ranges 49 ½ to 51 inches.
22. Room 67M has a fire extinguisher that is a protruding object. Measured 33 inches to the bottom and 6 ¼ inches from the wall.
23. Mirror measured 47 ¼ inches from the floor in 1071 Men's Restroom, 42 inches in the Gym Locker Room. Exceeds the maximum height of 40 inches from the floor
24. Coat hooks ranges 43-68 1/2 inches.
25. North Portables 1 & 2 has a ramp incline of 7.4 percent to 8.4 percent.
26. Performing Arts Center (PAC) has an AED that is a protruding object. Measured 45 inches from the ground floor and 8 inches from the wall.
27. PAC Women's Restroom ambulatory door does not have a handle on the outside.
28. PAC two light stations are not accessible.
29. PAC sound booth is not accessible.
30. PAC has accessible seating. Provide International Symbol for Accessibility.
31. Buzzy's Coffee Shop espresso machine reach ranges from lever of 46 ½ inches, touch pad of 53 inches to 59 ½ to top of machine.
32. The Hive Student Store has counter tops ranging from 36 inches to 42 inches. No forward approach.
33. Commons has rectangular and octagon tables that are not accessible.

Note: Great to see in the courtyard tables that are accessible. Greenhouse is accessible, nice concrete paths of travel on inside.

Aquatics Center

1. There are designated parking stalls. None of which are designated as ADA accessible parking.
2. Door pressure inside areas exceeds 5 pounds of pressure maximum. Ranges from 7-15 pounds.

3. Drinking fountains water pressure was at 14 pounds (exceeds 5 pounds of pressure).
4. Towel and clothing hooks measured 51-63 ¼ inches. Reach range is 40-48 inches maximum.
5. No accessible stall in the Men's Locker Room. No turning radius. Measured 66 inches by 36 inches. At door opening, a huge dip and drain noted.
6. Public Men's and Women's Restroom are not accessible. Door widths measured 27 inches. Remove assessable signage.
7. Spectator area is not accessible due to stairs. Participants view on pool deck.

Note: The Portable Aquatic Lift (PAL) was clean and in good working order. Maximum lift of 350 pounds. Available at all times when open.

Note: The Aquatics Manager indicated the decking, pool liner, door openers, drinking fountains are being replaced.

Enumclaw Administration and High School Interviewee Comments

1. Electives Fair and Hornet Day is very well attended.
2. Career Center is in the middle of the new building purposefully. Opening the student's eyes to possibilities.
3. CTE Month: Partner with Community Group through the Enumclaw Expo in February
4. TV screens used to highlight CTE programs and course offerings.
5. CTE teachers and students partner, i.e., Woodshop (build tiny home) and Welding (build trailer to transport)
6. Construction class will build a tiny house and involve the middle school and elementary students. 8th grade students teach math to the 5th grade students.
7. Welding and Floral will swap students. Good way to obtain Art credit.
8. Master Schedule is based on student requests
9. Electives translates into careers
10. Counselors help with course planning
11. Students select electives in order of priority
12. Students are encouraged to challenge themselves with classes
13. Seniors get everything they need in order to graduate
14. The computer does the scheduling once class selections have been submitted
15. SPED hand schedules everyone
16. Paras meet the needs of IEP students. There is a cap of 7-8 maximum in a class.
17. 6th period has a high percentage of SPED students
18. Fortunate to have Officer Reeves
19. There is a white privilege perspective
20. All staff received Culturally Responsive Training
21. Great having a Cultural Support Specialist
22. PSAT is paid by the district. 10th graders take during the school day.
23. Due to construction lost testing site. SAT is offered to students on Saturdays.
24. We lost the alternative school which created a huge impact. It was very successful There is a student population that just can't come here. Afternoon and evening classes. Transportation provided. We are not a one-size fit all and need it back. Miss it every day.

25. Hornet Alternative Learning; Start own in-house program. Helped a ton of kids.
26. Drug and Alcohol specialist needed here.
27. Parent and pregnant teens stay and help them to graduate. Adjusted schedule. Through district they get their own nurse. Prenatal, exercising, postnatal care. Receive car seats. Don't drop out. Good support system. Tree House.
28. Very supportive community.
29. Love working here!
30. Providing Equity Training with students and staff
31. Paras are receiving direct instruction. More inclusion and a part of the team. Go to PLC.
32. ACEs and Resiliency Training
33. Very supportive of LGBTQ
34. Some recognition of Unconscious Bias is out there. Trying to broaden perspective.
35. Dream bigger than that.
36. Science is offered through interest based.
37. Receive 504 and IEP information in a timely manner. Skyward is helpful tool as well.
38. Teachers are proactive with 504 and IEP students.
39. EL needs are only known through Skyward.
40. Have to figure it out. EL students don't want to bring attention to themselves.
41. Language barrier for EL students. Look for another student in class who can translate.
42. Little to no support in Science.
43. Need more paras, especially 6th period. Starting with one and another class needed it.
44. Science: 6th period needs paras. Paras are overworked. Some are assigned to two students who are split between two different classes. There is a student who cannot be by them self so the other student is not receiving support.
45. Para support is not consistent.
46. Things happen outside of the classroom. Hallways. Social media.
47. Assessment, Feedback and Technology.
48. Clear focus for years. Stable.
49. Goal is to give each class the same message. Science and Ag not getting the same message.
50. Able to try new things and experiment. It is okay to fail.
51. SPED students are active in welding, construction and Buzzy's
52. Most kids take CTE as an elective. Career pathways are more difficult
53. Apprenticeships and trades for kids.
54. Try to have electives fair to interest and attract kids and parents.
55. Broadening of CTE opportunities and CTSOs. DECA, FBLA, FFA, FCCLA and SkillsUSA, etc.
56. Theory of Action: Lends itself perfectly to CTE.
57. Ongoing system improvement. Seeking input from teams.
58. Training on IEPs with SPED staff.
59. Intervention teams.
60. Purchased software system called Home Room to track data.
61. Strong leadership program

Most proud of:

1. Friendly, welcoming and caring place
2. Good connections between students and teachers
3. Teacher relationships with one another
4. Great community
5. Still a single high school in the community, which helps to retain staff and teachers.
6. Nice to teach here
7. Safe place
8. The Muckelshoot Tribe has invested in the new building. Cultural artwork will be placed inside.
9. Resource Officer is mentoring EL student. Both excited.
10. Career and College Representative in the center of the school.
11. Drama department leads the way to inclusion.
12. SPED students now deliver the mail. Interactions with others is the highlight of their day.
13. Robotics 8 last year. 30 students this year.
14. DECA: Students go to state every year.
15. Several ways to communicate: Facebook, Social Media, Instagram.
16. Cultural Support Program
17. Art night. Students celebrated.
18. Like the feeling of trust with administration
19. Not a top down place.
20. Strategic Plan. Theory of Action
21. Authentic Learning
22. Teachers able to take risks in the interest of student learning.
23. Awesome students!
24. Love teacher community!
25. People really care.
26. Relationships comes before data.
27. Culture is very important here.
28. Be kind.
29. The community is supportive of education.
30. Community is willing to invest and be partners
31. Cabinet works really well together. Lifelong learners. Feel supported.
32. Fresh thinking is a good thing.
33. Right to Response Training for over 60 staff members
34. STAR Training
35. The care that each staff member has for each student.
36. Know each student personally. Help them see possibilities.
37. Relationships with unions
38. Instructional improvement
39. Building empathy with staff to support students
40. Staff to be the best learners for their students.
41. Kids who are kind and caring and pride for their learning.
42. Personal values match the values of the school district

43. Do a lot to celebrate for the sports teams. Have parades. Send offs for all sports who go to state.
44. Honor athletes who have good GPA. Recognized at School Board.
45. Huge POW WOW and huge fiesta in the spring. Invite tribal dancers from all over and students participate.
46. Fortunate to have a leader who is thoughtful, caring, and has a clear vision for staff and students.
47. There are clear expectations on how to treat people and kids.
48. Amazing place to work!

Greatest challenges:

1. The needs of the whole child
2. Mental illness issues
3. Understanding how adverse childhood experiences impacts learning.
4. Getting kids out of the community.
5. Biggest small town. Self-imposed.
6. Element: Keep Enumclaw small.
7. A lot of poverty and cultural aspects.

Things they would like to see changed:

1. Paras needs and providing more support to them.
2. 1:1 for the paras to get a chrome books.
3. Would like to see more inclusion with Hispanic population. They tend to sit together, sense of community.
4. Would like to have more translation services for EL students in the classroom.
5. Help with language barrier in the class. They feel the pressure.
6. Paras work really hard. Inclusion of all kids. Too big of caseload. Need more people. Personally invest in every student as individuals.
7. Communication in AG building. Not on the bell or intercom system. Hard for us now. Feeling disconnected.
8. Drug and Alcohol specialist needed.
9. Alternative High School for at risk students and those who have left school and need an opportunity to obtain credit recovery, find a place that can help them be successful, and graduate by the time they are 21 years old.
10. Need alternative high school that is off site. Own mascot, building, community, graduation.
11. More flexibility with the needs of kids. Credits, classroom vs. online, and school day as to flexible start and end times.
12. Authentic Learning.
13. Need for air conditioning in room 1005. Not working.
14. Cell phones
15. Students, teachers, staff, parents are made aware of policies and grievance procedures in handbooks, in the classrooms, and on the website.
16. Testing requirements.

17. Offer CTE pathways in High Demand areas, i.e. Health Services.
18. Make available career inventory links to possible careers and have a list of specific classes to help students.
19. More tools in place to help kids navigate the system.
20. Help build student's character and skills to be contributing citizens.

Student Focus Group at Enumclaw High School

Comments:

- Welcoming place
- Teachers are nice
- Teachers could be helpful. Some of them don't connect with student
- Some teachers are strict and they will not repeat instructions. Get frustrated easily with students.
- Teachers make people feel comfortable
- Teachers are really helpful
- The climate of the school has grown.
- Random gossip happens.
- Witnessed bullying and tried to stop it.
- There is always something going on with social media
- Issues are resolved that come up.
- Lots of pride for a small school
- Lots of school spirit
- DECA and FFA are not being advertised well
- Great bonding opportunities with CTSOs
- DECA members compete regionally and then some are eligible to compete at state. Some members are able to attend Fall Leadership Conference through fundraising.
- If not involved in sport, considered an outcast
- Closed campus except for all seniors and some juniors with privileges
- Computers are 10 years old and keep crashing. Running on Windows 7

Students are proud of:

- Welcoming to new people
- Drama
- Choir
- Anything art related
- Good selection of sports
- Sports teams: golf, basketball, volleyball, tennis, track, wrestling, football, gymnastics, water polo, swimming, lacrosse
- Leadership team works really hard for the students: assemblies
- People come together to help one another
- Opportunities for extra help with math
- Easy to connect
- The new building

Things they would like to see changed:

- New computers with the latest version of Microsoft Office
- Additional foreign exchange opportunities for students beyond going to Germany. Had to do a lot of own research in order to now be able to go to Japan.
- Focus on learning vs. grades
- Purchase new cameras
- Food options. Moldy banana and hair found in lasagna.
- Hang posters on walls in new building
- The new building areas are very sterile
- Make the announcements with enthusiasm. Tend to be boring.
- Let everyone have the opportunity to play sports. Don't make team cuts.
- Try to get more people to attend sports events.
- FFA and DECA to be advertised

Facilities Accessibility| Enumclaw Middle School

1. Signage needed to indicate Main Entrance.
2. Door pressure exceeded 5 pounds of pressure maximum – Ranges from 7-22 pounds.
3. Fixed seating in the Woodshop classroom.
4. Emergency Shower handle in the Woodshop measured 69 $\frac{3}{4}$ inches and Science measured 64 inches. Exceeds the maximum reach range of 40-48 inches.
5. First Aid Kit latch height measured 64 $\frac{1}{2}$ inches. Exceeds the maximum reach range of 40-48 inches.
6. Eyewash station and Emergency Shower areas have no tag to verify when last tested.
7. A5 SPED classroom distance to nearest accessible restroom measured 558 feet.
8. There is a restroom down the hall from A5 that has the International Symbol for Accessibility and states, Reserved For Use By Disabled. It is not accessible. Remove the signage.
9. A4 Room, Beginning Choir/Orchestra, has a ramp with an incline (9.3-13.2 percent) that exceeds 8.33 percent.
10. In some classrooms, setup configurations had aisle widths ranging 14 $\frac{1}{2}$ to 27 inches.
11. There is no forward approach to the student stations in Culinary
12. No adjustable tables in Culinary.
13. Fixed seating in B-6.
14. Gymnasium has bleachers with no ADA accessible areas for wheelchair access or companion seating.
15. Girls and Boys Locker Rooms and other bathroom sinks have unwrapped pipes.

Note: Conversation took place with an individual about striping parking lot where there is accessible parking in order to allow for vehicle to exit, currently blocked in, once done picking up student at the end of the school day.

Enumclaw Middle School Interviewee Comments

1. This year staff did carousel activities. Looked at pictures of the students and talked about the students and what they need.
2. Theory of Action. Have students excited about learning.

3. Strong Leadership program
4. Data trend: Have larger than average students served with IEPs. 19-20% Not sure why.
5. Teachers received IEPs and 504 on paper. Some available online.
6. Skyward, students are coded.
7. Received training on Unconscious Bias
8. Able to provide a device to hold the bow on the bridge for a student in order to work on fingering with the strings.
9. Repainted and redid the flow of the parking lot.
10. Able to provide program access.
11. Meet student's individual needs.
12. Very open campus. All doors don't have automatic openers. Students rely on other students to open doors.
13. Our model (resource model) mostly an inclusive model. Go into Gen Ed classes and supported by paras. Co-teaching with SPED and Gen Ed teachers.
14. SPED teacher who goes into Gen Ed English Arts class to support the teacher.
15. Accommodations are done on an individual student basis.
16. Before and after school student support.
17. EL – Good teaching and instruction. Here at EMS student collaboration and talk.
18. A lot of peer conversation within the academic structure.
19. The EL teacher is here for a half-hour each day and pulls out students during SSR time.
20. District very supportive of CTE.
21. Middle school is the most crucial time to expose girls to STEM.
22. Have an expanding Horizons STEM Conference aimed at middle school girls. Taking 15 students this year.
23. There are currently no options available in CTE nontrad classes for boys
24. High level of rigor for classes. Grading within the rigor.

Proud of:

1. Student voice and student leadership
2. CTE programs. Giving the students a problem with constraints, and finding a solution.
3. This will help them be employable.
4. Amazing students!
5. Students making orthopedic casts. They create an orthotic, wear it and present to the class. Peers rate and critique.
6. Student blogs. Teaching writing through blogging.
7. Project-based learning that requires lots of partner and group work.
8. Students are learning how to be successful.
9. Strong collaborative teacher group.
10. Peer walk-throughs to learn from one another.
11. Accommodations provided to students.
12. Music is a yearlong program and those students miss out on STEM opportunities.
13. Design class. Proud of the kids. 3D printing. Rigor everyday with the kids.
14. Kids are leaving here knowing about STEM. Progression of classes.
15. Robotics Club and how the program is growing.

16. Middle school students are connected to high school students who volunteer to help the middle school students in robotics. This has pushed the program to new heights. Overtime, it has now become a part of the culture of the school and district.
17. Added Energy and Environment to include more students.
18. Added Advanced Engineering, 30 kids instead of 90.
19. Medical Detectives and Programming offered.
20. Have a very nice computer lab.

Biggest challenges:

1. Attendance. Students can be gone for a week and up to a month. How do you catch students up?
2. Space limitations.
3. Figuring out how to offer more CTE course offerings.

Things they would like to see changed:

1. Want more offerings in order to give students more experiences.
2. Wish all the kids could go through the STEM program.
3. PLTW curriculum: Model, demonstrate, the rigor. Want Autodesk Inventor.
4. Have greater progression of CTE pathways at high school from what students learn at middle school.
5. Love 6th graders to be a part of it CTE course offerings. Currently, do not have the space for it.
6. Get us into Flight. Currently, no place in our schedule.
7. Bigger workroom.
8. We use the hall a lot for testing.

Student Focus Group at Enumclaw Middle School

Comments:

- It is a welcoming school
- People are kind
- It is harder to make friends if you come in from another school
- Teachers are very encouraging
- Teachers are intelligent
- Some teachers are entertaining and make learning fun
- Teachers are nice
- Teachers will help you with questions
- Some teachers will not repeat instructions
- Some teachers are not good at clarifying
- Some teachers don't explain the assignments given
- A student forgot a pencil one time and was told by the teacher, "You will not go far in life."
- Some teachers show favoritism to students who had their older siblings
- Woodshop is only offered the 6th grade students

- ASB for 6th grade has fall and spring elections. Fill out form, the ASB team interviews and asks questions and they choose who will be officers.
- ASB for 7th grade. A video is shown in Language Arts and students vote. It is a popularity contest.
- Alpha is an elective that ASB is required to take.
- Alpha students: Spirit assembly, Martin Luther King assembly. At Sunrise Elementary teach 3rd, 4th and 5th graders about empathy.
- Boys restroom was vandalized and have to use the gym restroom.
- Not allowed to use the restroom during class. Sometime very difficult.
- The homework assignments are not coordinated by the teachers.
- Five assignments can be due in one day.
- Teachers will assign homework on Friday and have it due on Monday. This amounts to multiple assignments being due on Monday, which impacts family time and obligations.

Students are proud of:

- Welcoming school
- Caring music teacher
- Sports teams
- Teachers and students are nice

Things they would like to see changed:

- They way students are able to pick electives
- Offer woodshop to 7th and 8th graders. Progressive learning.
- When teachers give an assignment, it would be helpful to start in class in order to ask questions and receive help if needed before leaving to the next class.
- Less homework assigned on Friday and due on Monday
- The ability to use the restroom when need to

Facilities Accessibility| Thunder Mountain Middle School

1. Door pressure inside doors exceed 5 pounds of pressure. Ranges from 5-15+ pounds.
2. Cafeteria tables are not accessible.
3. No forward approach to counters in Life Skills Room
4. Water fountain pressure ranges 4-10 pounds
5. Coat hooks ranges 54 ½-61 inches
6. Unwrapped sink pipes
7. Gymnasium bleachers with no ADA accessible areas for wheelchair access or companion seating.

Note: Wheelchair platform lift worked great. However, the permit posted was expired. 7/1/2018.

Thunder Mountain Middle School Interviewee Comments

1. Equity in everything we do for all of the kids and staff.
2. Kids have free choice.
3. CTE classes are valuable.

4. Offer nine different trimester elective classes on a three-year rotation.
5. 1:1 school with chrome books
6. Cultural specialist in building 4 days a week.
7. Yearly communications have translated copies in English and Spanish.
8. Translation provided by Savannah and Leslie who are housed at high school.
9. Trust kids. Sometimes a student will translate if need on an impromptu basis. Friends will help translate.
10. Remove barriers to students education
11. The Worth Effect: Kids will engage if they see the worth.
12. WASDA transgender policy and district policy contradict. Meet with leadership to discuss. Advocating for students
13. Students have hands on learning through PLTW. Project based, lots of moving and building. Get to practice what they our learning.
14. Students love programming at first, then get bored. One year may be too long commitment.
15. Would like to offer additional CTE course offerings on a trimester basis.
16. IEPs and 504 plans provided in a timely manner
17. Wednesday meetings for teachers to discuss issues with students and share how can help with students.

Proud of:

1. Rapport with students.
2. Have the support from administration.
3. Have great teacher mentor.
4. Counselor is always available to students.
5. Do whatever we can for kids to have them feel accepted and welcomed to school.
6. A New Theory of Action: Engaging with kids.
7. Message to students to jump in and try your best.
8. Relationship and resiliency
9. 67 percent of 8th graders moved from Level 1 to Level 2
10. 80 percent attendance
11. Kids always know what is expected
12. The culture being able to build around kids feeling safe

Some of the biggest challenges:

1. Teachers to learn more about social and emotional needs of students.
2. Not a very diverse district.
3. Attendance. It is important on how you address students.
4. Classroom management
5. The need to provide lots of ACEs training
6. Mental health issues
7. PLTW accounts do not allow teachers to see how students are doing, percentage of correct answers.

Things they would like to see changed:

1. Offer more electives that will allow students to have a broader range of opportunities.
2. Attracting more girls into science and computer programming.
3. Offer trimester classes.
4. PLTW programming to be a trimester course offering.
5. Offer genetics and bio-med.
6. Technology changes quickly. Recommend switching to JAVA from Robot C programming as the language is no longer applicable.
7. Trying to get more support with EL students.
8. More services available for mental, social and emotional needs.

Student Focus Group at Thunder Mountain Middle School

Comments:

- Welcoming school
- Need to make the effort to make friends
- There is a spot for everyone
- Counselor is open and available to contact
- Counselor is nice and cool
- Counselor is helpful and kind
- Don't know the counselor
- Teachers are good
- Some teachers are better than others
- Teachers are pretty ok
- Teachers are nice and helpful
- Sometimes teachers help and sometimes won't

Students are proud of:

- Choir
- Music program
- Assemblies
- Field Day
- Sports teams
- Leadership group: Positively Changed Titans (PCT)

Things they would like to see changed:

- Choice in selecting electives. Only have one can choose.
- More variety with clubs
- Add clubs: Artists, photography, drama, ski, snowboarding, dodgeball
- "Focus" opened up to doing homework or reading book of the month.
- "Focus" to be scheduled earlier in the day.
- Better quality of food and choice
- Change the milk vendor. The milk used to be good, not now.
- After school activities offered besides sports, which would allow for more student involvement

- Consistency with teacher's rules and what they want from students. It varies, i.e., tardy if standing at seat vs. sitting in seat. Not the same for every teacher.
- More academics outside of school

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. District has 90 days to submit a Voluntary Compliance Plan (VCP). I will send VCP template. Need to indicate who is responsible for each finding. Need to indicate month and year for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. Please email or call with questions. I am here to assist throughout the process.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Enumclaw School District

MOA Civil Rights Onsite Review Exit Meeting Notes

March 15, 2019 | 3-4 PM

Thanked the team for their hospitality.

I will provide Mike Nelson, Kim Herd, and Pete French with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

I also mentioned after a conversation with Mike, that I spoke with Rebecca Wallace, Washington State's CTE Executive Director, about asking OSPI leadership to share at superintendent's meetings and other meetings regarding the purpose of MOA Civil Rights onsite reviews, the process, standards that apply, and that districts could be notified of being selected depending on the selection criteria.

The following information is not inclusive of everything observed or noted but will provide insights.

Administrative

1. The Annual Nondiscrimination Statement was not been submitted to the community and placed on the district's website this school year or in previous years.

The following information is not inclusive of all the areas measured or areas that will be addressed in the Letter of Finding.

Facilities Accessibility | Enumclaw High School

1. Main Parking Lot has six parking spaces indicated as accessible. One of the accessible aisles measured 48 inches. Access aisles are to be 60 inches wide minimum.
2. Main Parking Lot accessible signage is too low. Ranges 43 inches at the bottom of the sign to 64 3/4 inches to the top of the sign. From the ground floor to the bottom of the sign is a minimum of 60 inches. One sign is missing by the North Commons entry.
3. South Student Parking Lot accessible signage is too low. Ranges 41 3/4 inches at the bottom of the sign to 59 3/4 inches to the top of the sign.
4. Door pressure exceeds 5 pounds of pressure maximum – Ranges from 5-18 pounds.
5. Drinking fountains indicate 5-10 pounds of pressure.
6. Drinking fountain arcs measure 2-8 ½ pounds of pressure.
7. Eyewash stations (not a system in place for testing). Need to flush the lines weekly. OSHA Fact Sheet regarding Amebae.

8. Room 256 eyewash station spout is not opening all the way. No testing tag.
9. Woodshop reach ranges for tools 48-55 inches.
10. Emergency Shower handle height measured 67 inches in Auto Shop.
11. Auto Shop classroom aisle configuration of 25 to 27 1/8 inches in width.
12. Safety striping is faded or very faint in the Auto Shop.
13. First Aid Kit is a protruding object (more than 4 inches from the wall) and measured 71 inches to the latch in the Auto Shop.
14. Some classroom desk or workstation aisle configurations ranges 16, 19 ½, 22, 25, 29, 31, 49 1/2 inches.
15. Classrooms counter top height of 36 inches. No forward approach.
16. No forward approach in Culinary to student workstations. Floor ground to pipe measured 19 ½ inches. Knee clearance minimum of 27 inches with a maximum counter height of 34 inches.
17. Culinary: Utensils height 62 inches, spices height 55 ½ inches, bread boards height 77 inches, apron hooks height 62 inches
18. Dishwasher area height ranges 34 ½ to 37 ½ inches. No forward approach.
19. Wash, Rinse, Sanitize area top counter height of 38 inches with a bar at the bottom measurement of 8 ½ inches. No forward approach.
20. Paper towel dispenser height ranges 50 ½ to 56 inches.
21. Soap dispenser height ranges 49 ½ to 51 inches.
22. Room 67M has a fire extinguisher that is a protruding object. Measured 33 inches to the bottom and 6 ¼ inches from the wall.
23. Mirror measured 47 ¼ inches from the floor in 1071 Men's Restroom, 42 inches in the Gym Locker Room. Exceeds the maximum height of 40 inches from the floor
24. Coat hooks ranges 43-68 1/2 inches.
25. North Portables 1 & 2 has a ramp incline of 7.4 percent to 8.4 percent.
26. Performing Arts Center (PAC) has an AED that is a protruding object. Measured 45 inches from the ground floor and 8 inches from the wall.
27. PAC Women's Restroom ambulatory door does not have a handle on the outside.
28. PAC two light stations are not accessible.
29. PAC sound booth is not accessible.
30. PAC has accessible seating. Provide International Symbol for Accessibility.
31. Buzzy's Coffee Shop espresso machine reach ranges from lever of 46 ½ inches, touch pad of 53 inches to 59 ½ to top of machine.
32. The Hive Student Store has counter tops ranging from 36 inches to 42 inches. No forward approach.
33. Commons has rectangular and octagon tables that are not accessible.

Note: Great to see in the courtyard tables that are accessible. Greenhouse is accessible, nice concrete paths of travel on inside.

Aquatics Center

1. There are designated parking stalls. None of which are designated as ADA accessible parking.
2. Door pressure inside areas exceeds 5 pounds of pressure maximum. Ranges from 7-15 pounds.

3. Drinking fountains water pressure was at 14 pounds (exceeds 5 pounds of pressure).
4. Towel and clothing hooks measured 51-63 ¼ inches. Reach range is 40-48 inches maximum.
5. No accessible stall in the Men's Locker Room. No turning radius. Measured 66 inches by 36 inches. At door opening, a huge dip and drain noted.
6. Public Men's and Women's Restroom are not accessible. Door widths measured 27 inches. Remove assessable signage.
7. Spectator area is not accessible due to stairs. Participants view on pool deck.

Note: The Portable Aquatic Lift (PAL) was clean and in good working order. Maximum lift of 350 pounds. Available at all times when open.

Note: The Aquatics Manager indicated the decking, pool liner, door openers, drinking fountains are being replaced.

Enumclaw Administration and High School Interviewee Comments

1. Electives Fair and Hornet Day is very well attended.
2. Career Center is in the middle of the new building purposefully. Opening the student's eyes to possibilities.
3. CTE Month: Partner with Community Group through the Enumclaw Expo in February
4. TV screens used to highlight CTE programs and course offerings.
5. CTE teachers and students partner, i.e., Woodshop (build tiny home) and Welding (build trailer to transport)
6. Construction class will build a tiny house and involve the middle school and elementary students. 8th grade students teach math to the 5th grade students.
7. Welding and Floral will swap students. Good way to obtain Art credit.
8. Master Schedule is based on student requests
9. Electives translates into careers
10. Counselors help with course planning
11. Students select electives in order of priority
12. Students are encouraged to challenge themselves with classes
13. Seniors get everything they need in order to graduate
14. The computer does the scheduling once class selections have been submitted
15. SPED hand schedules everyone
16. Paras meet the needs of IEP students. There is a cap of 7-8 maximum in a class.
17. 6th period has a high percentage of SPED students
18. Fortunate to have Officer Reeves
19. There is a white privilege perspective
20. All staff received Culturally Responsive Training
21. Great having a Cultural Support Specialist
22. PSAT is paid by the district. 10th graders take during the school day.
23. Due to construction lost testing site. SAT is offered to students on Saturdays.
24. We lost the alternative school which created a huge impact. It was very successful There is a student population that just can't come here. Afternoon and evening classes. Transportation provided. We are not a one-size fit all and need it back. Miss it every day.

25. Hornet Alternative Learning; Start own in-house program. Helped a ton of kids.
26. Drug and Alcohol specialist needed here.
27. Parent and pregnant teens stay and help them to graduate. Adjusted schedule. Through district they get their own nurse. Prenatal, exercising, postnatal care. Receive car seats. Don't drop out. Good support system. Tree House.
28. Very supportive community.
29. Love working here!
30. Providing Equity Training with students and staff
31. Paras are receiving direct instruction. More inclusion and a part of the team. Go to PLC.
32. ACEs and Resiliency Training
33. Very supportive of LGBTQ
34. Some recognition of Unconscious Bias is out there. Trying to broaden perspective.
35. Dream bigger than that.
36. Science is offered through interest based.
37. Receive 504 and IEP information in a timely manner. Skyward is helpful tool as well.
38. Teachers are proactive with 504 and IEP students.
39. EL needs are only known through Skyward.
40. Have to figure it out. EL students don't want to bring attention to themselves.
41. Language barrier for EL students. Look for another student in class who can translate.
42. Little to no support in Science.
43. Need more paras, especially 6th period. Starting with one and another class needed it.
44. Science: 6th period needs paras. Paras are overworked. Some are assigned to two students who are split between two different classes. There is a student who cannot be by them self so the other student is not receiving support.
45. Para support is not consistent.
46. Things happen outside of the classroom. Hallways. Social media.
47. Assessment, Feedback and Technology.
48. Clear focus for years. Stable.
49. Goal is to give each class the same message. Science and Ag not getting the same message.
50. Able to try new things and experiment. It is okay to fail.
51. SPED students are active in welding, construction and Buzzy's
52. Most kids take CTE as an elective. Career pathways are more difficult
53. Apprenticeships and trades for kids.
54. Try to have electives fair to interest and attract kids and parents.
55. Broadening of CTE opportunities and CTSOs. DECA, FBLA, FFA, FCCLA and SkillsUSA, etc.
56. Theory of Action: Lends itself perfectly to CTE.
57. Ongoing system improvement. Seeking input from teams.
58. Training on IEPs with SPED staff.
59. Intervention teams.
60. Purchased software system called Home Room to track data.
61. Strong leadership program

Most proud of:

1. Friendly, welcoming and caring place
2. Good connections between students and teachers
3. Teacher relationships with one another
4. Great community
5. Still a single high school in the community, which helps to retain staff and teachers.
6. Nice to teach here
7. Safe place
8. The Muckelshoot Tribe has invested in the new building. Cultural artwork will be placed inside.
9. Resource Officer is mentoring EL student. Both excited.
10. Career and College Representative in the center of the school.
11. Drama department leads the way to inclusion.
12. SPED students now deliver the mail. Interactions with others is the highlight of their day.
13. Robotics 8 last year. 30 students this year.
14. DECA: Students go to state every year.
15. Several ways to communicate: Facebook, Social Media, Instagram.
16. Cultural Support Program
17. Art night. Students celebrated.
18. Like the feeling of trust with administration
19. Not a top down place.
20. Strategic Plan. Theory of Action
21. Authentic Learning
22. Teachers able to take risks in the interest of student learning.
23. Awesome students!
24. Love teacher community!
25. People really care.
26. Relationships comes before data.
27. Culture is very important here.
28. Be kind.
29. The community is supportive of education.
30. Community is willing to invest and be partners
31. Cabinet works really well together. Lifelong learners. Feel supported.
32. Fresh thinking is a good thing.
33. Right to Response Training for over 60 staff members
34. STAR Training
35. The care that each staff member has for each student.
36. Know each student personally. Help them see possibilities.
37. Relationships with unions
38. Instructional improvement
39. Building empathy with staff to support students
40. Staff to be the best learners for their students.
41. Kids who are kind and caring and pride for their learning.
42. Personal values match the values of the school district

43. Do a lot to celebrate for the sports teams. Have parades. Send offs for all sports who go to state.
44. Honor athletes who have good GPA. Recognized at School Board.
45. Huge POW WOW and huge fiesta in the spring. Invite tribal dancers from all over and students participate.
46. Fortunate to have a leader who is thoughtful, caring, and has a clear vision for staff and students.
47. There are clear expectations on how to treat people and kids.
48. Amazing place to work!

Greatest challenges:

1. The needs of the whole child
2. Mental illness issues
3. Understanding how adverse childhood experiences impacts learning.
4. Getting kids out of the community.
5. Biggest small town. Self-imposed.
6. Element: Keep Enumclaw small.
7. A lot of poverty and cultural aspects.

Things they would like to see changed:

1. Paras needs and providing more support to them.
2. 1:1 for the paras to get a chrome books.
3. Would like to see more inclusion with Hispanic population. They tend to sit together, sense of community.
4. Would like to have more translation services for EL students in the classroom.
5. Help with language barrier in the class. They feel the pressure.
6. Paras work really hard. Inclusion of all kids. Too big of caseload. Need more people. Personally invest in every student as individuals.
7. Communication in AG building. Not on the bell or intercom system. Hard for us now. Feeling disconnected.
8. Drug and Alcohol specialist needed.
9. Alternative High School for at risk students and those who have left school and need an opportunity to obtain credit recovery, find a place that can help them be successful, and graduate by the time they are 21 years old.
10. Need alternative high school that is off site. Own mascot, building, community, graduation.
11. More flexibility with the needs of kids. Credits, classroom vs. online, and school day as to flexible start and end times.
12. Authentic Learning.
13. Need for air conditioning in room 1005. Not working.
14. Cell phones
15. Students, teachers, staff, parents are made aware of policies and grievance procedures in handbooks, in the classrooms, and on the website.
16. Testing requirements.

17. Offer CTE pathways in High Demand areas, i.e. Health Services.
18. Make available career inventory links to possible careers and have a list of specific classes to help students.
19. More tools in place to help kids navigate the system.
20. Help build student's character and skills to be contributing citizens.

Student Focus Group at Enumclaw High School

Comments:

- Welcoming place
- Teachers are nice
- Teachers could be helpful. Some of them don't connect with student
- Some teachers are strict and they will not repeat instructions. Get frustrated easily with students.
- Teachers make people feel comfortable
- Teachers are really helpful
- The climate of the school has grown.
- Random gossip happens.
- Witnessed bullying and tried to stop it.
- There is always something going on with social media
- Issues are resolved that come up.
- Lots of pride for a small school
- Lots of school spirit
- DECA and FFA are not being advertised well
- Great bonding opportunities with CTSOs
- DECA members compete regionally and then some are eligible to compete at state. Some members are able to attend Fall Leadership Conference through fundraising.
- If not involved in sport, considered an outcast
- Closed campus except for all seniors and some juniors with privileges
- Computers are 10 years old and keep crashing. Running on Windows 7

Students are proud of:

- Welcoming to new people
- Drama
- Choir
- Anything art related
- Good selection of sports
- Sports teams: golf, basketball, volleyball, tennis, track, wrestling, football, gymnastics, water polo, swimming, lacrosse
- Leadership team works really hard for the students: assemblies
- People come together to help one another
- Opportunities for extra help with math
- Easy to connect
- The new building

Things they would like to see changed:

- New computers with the latest version of Microsoft Office
- Additional foreign exchange opportunities for students beyond going to Germany. Had to do a lot of own research in order to now be able to go to Japan.
- Focus on learning vs. grades
- Purchase new cameras
- Food options. Moldy banana and hair found in lasagna.
- Hang posters on walls in new building
- The new building areas are very sterile
- Make the announcements with enthusiasm. Tend to be boring.
- Let everyone have the opportunity to play sports. Don't make team cuts.
- Try to get more people to attend sports events.
- FFA and DECA to be advertised

Facilities Accessibility| Enumclaw Middle School

1. Signage needed to indicate Main Entrance.
2. Door pressure exceeded 5 pounds of pressure maximum – Ranges from 7-22 pounds.
3. Fixed seating in the Woodshop classroom.
4. Emergency Shower handle in the Woodshop measured 69 $\frac{3}{4}$ inches and Science measured 64 inches. Exceeds the maximum reach range of 40-48 inches.
5. First Aid Kit latch height measured 64 $\frac{1}{2}$ inches. Exceeds the maximum reach range of 40-48 inches.
6. Eyewash station and Emergency Shower areas have no tag to verify when last tested.
7. A5 SPED classroom distance to nearest accessible restroom measured 558 feet.
8. There is a restroom down the hall from A5 that has the International Symbol for Accessibility and states, Reserved For Use By Disabled. It is not accessible. Remove the signage.
9. A4 Room, Beginning Choir/Orchestra, has a ramp with an incline (9.3-13.2 percent) that exceeds 8.33 percent.
10. In some classrooms, setup configurations had aisle widths ranging 14 $\frac{1}{2}$ to 27 inches.
11. There is no forward approach to the student stations in Culinary
12. No adjustable tables in Culinary.
13. Fixed seating in B-6.
14. Gymnasium has bleachers with no ADA accessible areas for wheelchair access or companion seating.
15. Girls and Boys Locker Rooms and other bathroom sinks have unwrapped pipes.

Note: Conversation took place with an individual about striping parking lot where there is accessible parking in order to allow for vehicle to exit, currently blocked in, once done picking up student at the end of the school day.

Enumclaw Middle School Interviewee Comments

1. This year staff did carousel activities. Looked at pictures of the students and talked about the students and what they need.
2. Theory of Action. Have students excited about learning.

3. Strong Leadership program
4. Data trend: Have larger than average students served with IEPs. 19-20% Not sure why.
5. Teachers received IEPs and 504 on paper. Some available online.
6. Skyward, students are coded.
7. Received training on Unconscious Bias
8. Able to provide a device to hold the bow on the bridge for a student in order to work on fingering with the strings.
9. Repainted and redid the flow of the parking lot.
10. Able to provide program access.
11. Meet student's individual needs.
12. Very open campus. All doors don't have automatic openers. Students rely on other students to open doors.
13. Our model (resource model) mostly an inclusive model. Go into Gen Ed classes and supported by paras. Co-teaching with SPED and Gen Ed teachers.
14. SPED teacher who goes into Gen Ed English Arts class to support the teacher.
15. Accommodations are done on an individual student basis.
16. Before and after school student support.
17. EL – Good teaching and instruction. Here at EMS student collaboration and talk.
18. A lot of peer conversation within the academic structure.
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Biggest challenges:

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3. Figuring out how to offer more CTE course offerings.

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1. Want more offerings in order to give students more experiences.
2. Wish all the kids could go through the STEM program.
3. PLTW curriculum: Model, demonstrate, the rigor. Want Autodesk Inventor.
4. Have greater progression of CTE pathways at high school from what students learn at middle school.
5. Love 6th graders to be a part of it CTE course offerings. Currently, do not have the space for it.
6. Get us into Flight. Currently, no place in our schedule.
7. Bigger workroom.
8. We use the hall a lot for testing.

Student Focus Group at Enumclaw Middle School

Comments:

- It is a welcoming school
- People are kind
- It is harder to make friends if you come in from another school
- Teachers are very encouraging
- Teachers are intelligent
- Some teachers are entertaining and make learning fun
- Teachers are nice
- Teachers will help you with questions
- Some teachers will not repeat instructions
- Some teachers are not good at clarifying
- Some teachers don't explain the assignments given
- A student forgot a pencil one time and was told by the teacher, "You will not go far in life."
- Some teachers show favoritism to students who had their older siblings
- Woodshop is only offered the 6th grade students

- ASB for 6th grade has fall and spring elections. Fill out form, the ASB team interviews and asks questions and they choose who will be officers.
- ASB for 7th grade. A video is shown in Language Arts and students vote. It is a popularity contest.
- Alpha is an elective that ASB is required to take.
- Alpha students: Spirit assembly, Martin Luther King assembly. At Sunrise Elementary teach 3rd, 4th and 5th graders about empathy.
- Boys restroom was vandalized and have to use the gym restroom.
- Not allowed to use the restroom during class. Sometime very difficult.
- The homework assignments are not coordinated by the teachers.
- Five assignments can be due in one day.
- Teachers will assign homework on Friday and have it due on Monday. This amounts to multiple assignments being due on Monday, which impacts family time and obligations.

Students are proud of:

- Welcoming school
- Caring music teacher
- Sports teams
- Teachers and students are nice

Things they would like to see changed:

- They way students are able to pick electives
- Offer woodshop to 7th and 8th graders. Progressive learning.
- When teachers give an assignment, it would be helpful to start in class in order to ask questions and receive help if needed before leaving to the next class.
- Less homework assigned on Friday and due on Monday
- The ability to use the restroom when need to

Facilities Accessibility| Thunder Mountain Middle School

1. Door pressure inside doors exceed 5 pounds of pressure. Ranges from 5-15+ pounds.
2. Cafeteria tables are not accessible.
3. No forward approach to counters in Life Skills Room
4. Water fountain pressure ranges 4-10 pounds
5. Coat hooks ranges 54 ½-61 inches
6. Unwrapped sink pipes
7. Gymnasium bleachers with no ADA accessible areas for wheelchair access or companion seating.

Note: Wheelchair platform lift worked great. However, the permit posted was expired. 7/1/2018.

Thunder Mountain Middle School Interviewee Comments

1. Equity in everything we do for all of the kids and staff.
2. Kids have free choice.
3. CTE classes are valuable.

4. Offer nine different trimester elective classes on a three-year rotation.
5. 1:1 school with chrome books
6. Cultural specialist in building 4 days a week.
7. Yearly communications have translated copies in English and Spanish.
8. Translation provided by Savannah and Leslie who are housed at high school.
9. Trust kids. Sometimes a student will translate if need on an impromptu basis. Friends will help translate.
10. Remove barriers to students education
11. The Worth Effect: Kids will engage if they see the worth.
12. WASDA transgender policy and district policy contradict. Meet with leadership to discuss. Advocating for students
13. Students have hands on learning through PLTW. Project based, lots of moving and building. Get to practice what they our learning.
14. Students love programming at first, then get bored. One year may be too long commitment.
15. Would like to offer additional CTE course offerings on a trimester basis.
16. IEPs and 504 plans provided in a timely manner
17. Wednesday meetings for teachers to discuss issues with students and share how can help with students.

Proud of:

1. Rapport with students.
2. Have the support from administration.
3. Have great teacher mentor.
4. Counselor is always available to students.
5. Do whatever we can for kids to have them feel accepted and welcomed to school.
6. A New Theory of Action: Engaging with kids.
7. Message to students to jump in and try your best.
8. Relationship and resiliency
9. 67 percent of 8th graders moved from Level 1 to Level 2
10. 80 percent attendance
11. Kids always know what is expected
12. The culture being able to build around kids feeling safe

Some of the biggest challenges:

1. Teachers to learn more about social and emotional needs of students.
2. Not a very diverse district.
3. Attendance. It is important on how you address students.
4. Classroom management
5. The need to provide lots of ACEs training
6. Mental health issues
7. PLTW accounts do not allow teachers to see how students are doing, percentage of correct answers.

Things they would like to see changed:

1. Offer more electives that will allow students to have a broader range of opportunities.
2. Attracting more girls into science and computer programming.
3. Offer trimester classes.
4. PLTW programming to be a trimester course offering.
5. Offer genetics and bio-med.
6. Technology changes quickly. Recommend switching to JAVA from Robot C programming as the language is no longer applicable.
7. Trying to get more support with EL students.
8. More services available for mental, social and emotional needs.

Student Focus Group at Thunder Mountain Middle School

Comments:

- Welcoming school
- Need to make the effort to make friends
- There is a spot for everyone
- Counselor is open and available to contact
- Counselor is nice and cool
- Counselor is helpful and kind
- Don't know the counselor
- Teachers are good
- Some teachers are better than others
- Teachers are pretty ok
- Teachers are nice and helpful
- Sometimes teachers help and sometimes won't

Students are proud of:

- Choir
- Music program
- Assemblies
- Field Day
- Sports teams
- Leadership group: Positively Changed Titans (PCT)

Things they would like to see changed:

- Choice in selecting electives. Only have one can choose.
- More variety with clubs
- Add clubs: Artists, photography, drama, ski, snowboarding, dodgeball
- "Focus" opened up to doing homework or reading book of the month.
- "Focus" to be scheduled earlier in the day.
- Better quality of food and choice
- Change the milk vendor. The milk used to be good, not now.
- After school activities offered besides sports, which would allow for more student involvement

- Consistency with teacher's rules and what they want from students. It varies, i.e., tardy if standing at seat vs. sitting in seat. Not the same for every teacher.
- More academics outside of school

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. District has 90 days to submit a Voluntary Compliance Plan (VCP). I will send VCP template. Need to indicate who is responsible for each finding. Need to indicate month and year for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. Please email or call with questions. I am here to assist throughout the process.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Spokane School District

MOA Civil Rights Onsite Review Exit Meeting Notes

March 21, 2019 | 1-2 PM

Thanked the team for their hospitality.

I will provide Shelley Redinger, Rob Findley, Phil Wright and Debbie Oakley with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

The following information is not inclusive of everything observed or noted:

Administrative

1. The Annual Nondiscrimination Statement has not been written, published or disseminated.

Counseling Center

1. The Counseling Center does not have any publication other than English.

The following information is not inclusive of all the areas measured or areas that will be addressed in the Letter of Finding.

Facilities Accessibility | Lewis and Clark High School

1. Need directional signage at the Entrance and along the path of travel indicating location of accessible entrance.
2. There are four designated accessible parking spaces in the Field House Garage. Two have accessible signage, measured 36 $\frac{3}{4}$ inches and 37 inches respectively from the floor ground, that is too low and two do not have signage. The accessible signage should measure a minimum of 60 inches from the ground floor to the bottom of the sign.
3. Field House Garage access aisle measured 51 inches. Access aisles are to be 60 inches wide minimum.
4. Field House Garage Parking Lot to Elevator Ramp has a Ramp that exceeds 8.33 percent. It had incline slope ranges from the bottom of the ramp of 8.2 percent, middle at 8.6 percent and top at 8.9 percent.
5. The auditorium wheelchair accessible seating needs to be labeled with the International Symbol of Accessibility.
6. Distance traveling from the auditorium to the Stage is 310 feet.
7. Distance traveling from the first ADA accessible parking space from courtyard to stage is 633 feet.

8. Distance traveling from Staff Parking Lot to Stage is 814 feet.
9. There is no building or storage space in the auditorium. Staff and students go across the street and upstairs to store items. This is dangerous.
10. Door pressure exceeds the maximum amount of 5 pounds of pressure. The door pressure ranges were from 7 to 15 pounds of pressure consistently throughout the building. The maximum allowable pressure is five pounds.
11. Emergency eyewash stations work. However, three was no tag indicating when last tested in Rooms 212, 311.
12. Fixed seating and aisles configuration ranged from 12 to 29 inches which does not allow for a clear path of travel of a minimum of 32 inches in Rooms 005, 031, 047, 121, 125, 133, 135, 225, 227, 229, 311, 321, 319, 329, 331, F102, F104, etc.
13. Rooms 109, 111, 117 and 127 have adjustable tables. However, the bar or bottom of the table measured in ranges from 20-26 ½ inches from the floor ground making it not accessible.
14. Main Office counter height measured 40 ¾ inches. Accessible counter height is 34 inches maximum.
15. Student Office, Attendance and Counseling Counter heights measured 40 inches. Accessible counter height is 34 inches maximum.
16. Workstations in Room 212 measured 25 inches at the bottom and 30 inches at the top. Not accessible.
17. Library has table heights of 26 inches from the ground floor to the bottom of the table to 29 ½ inches to the top of the table. Not accessible.
18. No forward approach to the culinary stations. Measured 37 inches to the top of the counters.
19. In Culinary, the microwave handles measured at 62 inches. Reach range is 40-48 inches maximum.
20. First Aid Kit latch measured at 58 inches in Rooms 013 and 015. Reach range is 40-48 inches maximum.
21. Sink pipes in some of the restrooms are not insulated.
22. Coat hook heights in some of the restrooms ranged from 59-62 inches. Reach range is 40-48 inches maximum.
23. Some of the restroom accessible stalls do not have latches or handles on the outside of the doors. This makes it difficult for individuals to open with one hand and not require tight grasping, pinching, or twisting of the wrist.
24. Some drinking fountains measured 15-18 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
25. Paper towel dispenser handle measured 51 inches in Room 013. Exceeds the maximum reach range of 48 inches.
26. Wrestling Room has a mat. Ground floor to mat is 1 inch. Must have transition as the lip is too high.
27. Strength Training Room has several platform mini-ramps with incline slopes of 25 percent, exceeding the maximum of 8.33 percent.

Administrative Interviewees

Comments:

1. Listen to the people we serve. We want to find out how to make things better.
2. Goal: T-2-4 (rebranding). Preparing students to successfully complete some form of higher education: technical, 2-year, or 4-year.
3. Cultural Development Training. Teaming with WEA and SEA local union to provide cultural training in the buildings.
4. Power School is used.
5. CTE Fair is held every Spring. 8th grade transition.
6. Expanding CTSOs and extended learning opportunities.
7. Remove CTE one offs that don't go anywhere.
8. Three STEM pathways and five articulation pathways. High quality teachers.
9. Continuous evaluation and re-evaluation.
10. 504 Cheat Sheet to be created. Qualifications, law and flow.
11. There is a designated Title IX Coordinator in each building. Have had Safe Schools training. Need to do additional training.
12. Target job fair for Marshallese community. Building relationships.
13. Continued work with staff regarding explicit bias training due to staff making culturally insensitive statements.
14. We care. In it for the kids.

Greatest challenges for students:

1. There have been threats to do harm at the school. Safety and Security Audit being conducted.
2. Kids are stressed.
3. Pressure to be online and connected.
4. Kids don't get enough sleep.
5. Students worry about politics.
6. Overcoming the "College Only" mantra with community and parents.
7. Finding individuals from business and industry to become instructors. Difficult due to salaries and managing kids.

Greatest challenges for teachers:

1. There have been threats to do harm at the school. Safety and Security Audit being conducted.
2. Don't have training background with second language acquisition. How to handle a classroom.
3. That 504s are just as serious as an IEP. Educating them and explaining the "Why" behind it.
4. Obtaining training when receiving new equipment or technology.

Things would like to change:

1. Funding for basic needs. The state does not fund basic needs for nurses, counselors, mental health specialists. It becomes a community issue.
2. Budget deficit. The need to come up with a sustainable plan.

3. Funding. Don't like how CTE is funded.
4. Diversify the workforce.
5. Would have year-round school and longer days.
6. Tie to apprenticeships and work.
7. Power School has been more difficult than what they originally thought it would be. Technology piece is a barrier. Need a tech savvy person to address.
8. Obtaining training when receiving new equipment or technology.

Most proud of:

1. The students
2. Love the choices and options for every type of student.
3. Multiple certifications offered.
4. Getting pathways aligned.
5. Making sure every pathway ends in certificate, industry credential or articulated credit.
6. Supportive environment.
7. The people who are very committed and take a lot of pride in their work and the mission of educating kids.
8. Parent community

Lewis and Clark High School Interviewees

Comments:

1. Great parent community.
2. All students can take AP tests. District pays to remove the barrier.
3. Students are encouraged to join clubs, band, orchestra, and sports. Will create C squads.
4. Provide interpreters at student led conferences.
5. NEWTECH has a disproportionate high enrollment with SPED.
6. CTE teachers are good about recruiting and have students share with other students
7. Foods Room counters are not accessible.
8. The school has lots of stairs. It is a barrier.
9. Classrooms are crowded and not easy to move around.
10. Offer many career awareness activities and bring in guest speakers and take field trips.

Greatest challenges:

1. Access into the building.
2. Students who have experienced a great deal of trauma and dealing with mental health issues.
3. Bumping against industry standards. Students must meet industry standards. They are allowed the opportunity to take classes. The higher the standard, the less accessible.
4. Managing time and responsibilities
5. Dealing with a wide variety of skills in the classroom. 2nd, 3rd grade level reading and advanced
6. Differentiation
7. Content Learning Team: CTE, Math, Science, English
8. Advisory Committees

9. Recruiting
10. Competitions
11. Getting away from traditional teaching
12. Size of the room regarding safety and egress
13. Have to move from room to room on two separate floors and carrying everything.
14. Students coming to class without computer skills.
15. Limited space
16. Don't have classroom. Have to move four times.
17. Don't have the room to expand.
18. Kids can be distracted and take long lunches.

Things would like to change:

1. Access into the building
2. Bigger building
3. Ramp entry, back elevator, locked gate and have to have a badge to get in.
4. 504 expert in the district and in each building
5. Safety concern. Only one resource officer and asked to go into situations without backup.
6. Culinary stations are not accessible.
7. Classrooms are full all the time. Cramped and difficult to move around.
8. High needs students are all located in the basement.
9. Lots of movement with administration which impacts every building. Lack of consistency.

Most proud of:

1. Diversity. Great kids and different perspectives.
2. Family feel even with the size of the school
3. Graduation rate
4. Experienced counseling team at the building level and district
5. Amazed at how committed the teachers and staff are for the kids. Student are always first!
6. Marybeth's door is always open. She is engaged, intentional and positive.
7. Getting kids excited about career areas.
8. Being able to build Computer Science and exposing students to technology.
9. The number of students who gain metal art skills.
10. Film Club and working with kids at risk.
11. The capacity to work with the students and meet their needs.
12. Huge diversity of adults who want to help students
13. The students are fantastic!
14. Administration trusts and gives the freedom to try different things.
15. Helping and serving others, especially the marginalized.
16. District leadership paying attention to SPED
17. Being a Tiger
18. History of the bldg. and school

19. I love it here!
20. Support from the counselors and administrators
21. Achievements of the students when they leave here
22. Successful and inspirational students

Student Focus Group at Lewis and Clark High School

Comments:

1. Love LC!
2. Like teachers who also help outside of the classroom
3. Students feel welcomed and safe
4. Teachers passionate about material they teach
5. Lots of supports from teachers
6. Peers are driven academically
7. Inclusiveness
8. Positive Culture
9. Choice School
10. Feel safe
11. Can be myself
12. Teachers are pleasant
13. Feel most comfortable in CTE classes
14. AP classes
15. Teachers are heartfelt
16. Club opportunities: TV/Video, Debate, Key Club
17. CTSO: DECA
18. Welcoming school
19. Make good friends
20. Lots of sports: golf, soccer, basketball, baseball, slow pitch
21. No cafeteria or a real place to eat
22. Slow log-in process
23. Restrooms are crowded
24. Some information not relayed well to students
25. Love the environment!

Things would like to see changed:

1. Have a cafeteria. No real place to eat.
2. "Seminar" to be more efficient
3. Teachers communicating more effectively with students
4. Do more with IEP and 504 students
5. Add a German class
6. Computers that work. Slow login process.
7. Science notebooks. Don't grade on content. Teacher needs to communicate better.
8. Lots of people in the restrooms. So crowded.

Most proud of:

1. Feel welcomed and included
2. Love the diversity
3. Good learning environment
4. Academics
5. AP classes
6. Drama
7. Drill Team
8. Yearbook
9. Fellow Ensemble
10. Athletics
11. School Spirit: "Show Up and Show Out"
12. Like the building
13. Good social atmosphere
14. Staff reaching out about internship and scholarship opportunities
15. Teachers are helpful
16. Teachers work hard to get to know you
17. There are clubs for everything, including Ping-Pong
18. Teachers genuinely care about students
19. Teamwork
20. Ethics
21. The passion for the school
22. Great community
23. The teachers and the material they provide to us
24. Calculus teacher brings positivity
25. Inclusiveness
26. Relationships with students and teachers

Facilities Accessibility| North Central High School

1. Main Parking Lot has four accessible signs that measure in ranges from 43 ½-47 inches from the ground floor to the bottom of the signs. The accessible signage should measure a minimum of 60 inches from the ground floor to the bottom of each sign.
2. Main Parking Lot has six access aisles, four of which have measurements that range from 58 ½ - 59 ¼ inches. Access aisles are to be 60 inches wide minimum.
3. North Student Parking Lot has two accessible signs that measure in ranges from 38 ¼ - 39 ¼ inches from the ground floor to the bottom of the signs. The accessible signage should measure a minimum of 60 inches from the ground floor to the bottom of each sign.
4. Theater seating for individuals in wheelchairs are at the top where the lighting is located. The path of travel requires individuals to go down the hall to the elevator, go down the elevator and come back the opposite way, downstairs hall, through service hallway, into the theater by Room 02. The path of travel distance is over 650 feet.
5. Downstairs path of travel to the theater: Individuals in wheelchairs are dropped off in service alley where there is no accessible signage to the door. Once the individuals are inside the door, they travel through the building until entering the theater and sitting in front of the stationary seats. Also, there is no vehicle turn around radius at this entrance

so vehicles are driven down the road, turn around, and drive back passing the service alley to the top parking lot.

6. The AED measured 9 inches from the wall, and the fire extinguisher, measured 8 ½ inches from the wall, located next to the Gym elevator. Items measuring 4 inches from the wall are considered protruding objects.
7. Some drinking fountains, measured 8 -19 ½ inches from the wall, are protruding objects. Items measuring 4 inches from the wall are considered protruding objects.
8. Coat hook heights in restrooms ranged from 51 ½ - 66 inches. Reach range is 40-48 inches maximum.
9. Some restroom accessible stalls do not have latches or handles on the outside of the doors. This makes it difficult for individuals to open with one hand and not require tight grasping, pinching, or twisting of the wrist.
10. Sink pipes in some of the restrooms are not insulated.
11. Door pressure exceeds the maximum amount of 5 pounds of pressure. The door pressure ranges were from 8 to 28 pounds of pressure consistently throughout the building.
12. Mirrors in some of the restrooms ranged in measurements from 47-51 inches. The maximum height is 40 inches from the ground floor to the bottom of the mirror.
13. Paper towel dispensers in some of the restrooms ranged in measurements from 50-53 inches. Exceeds the maximum reach range of 48 inches.
14. Soap dispensers in some of the restrooms ranged in measurements from 51 inches. Exceeds the maximum reach range of 48 inches.
15. Accessible signage needs to be hung for restrooms that have accessible restroom stalls, N214, N218, N223.
16. The distance from the Drama Classroom to the closest accessible restroom for students, is by Room N136, Women, measured 464 feet.
17. The distance from the Drama Classroom to the closest Women's and Men's Staff Restrooms measured 242 ½ feet.
18. Men's Dressing Room, 141A, restroom is not accessible.
19. Some drinking fountain pressures ranged from 7-17 pounds of pressure. The maximum allowable pressure is five pounds.
20. Main Office counter height measured 41 ¾ inches, Business Office counter height measured 42 ¼ inches, Student/Counseling Office counter height measured 41 ¾ inches, Theater counter height measured 42 ½ inches, Library counter height measured 42 inches from the ground floor to the top of the counter. Accessible counter height is 34 inches maximum.
21. Aisles configuration ranged from 18 to 21 inches in width which does not allow for a clear path of travel of a minimum of 32 inches in width in rooms N209, N246, N319.
22. Tables/desks are not accessible in various classrooms, 109, 124 C, N228, N231, N239, N243, N303, N337, N339, etc. Measurement ranges 22 ¼ - 25 ¾ inches from the ground floor to the bottom of the bar or desk.
23. First Aid Kit latch measured at 53 ½ inches in Room 118, measured at 60 inches in Staff Lounge, Woods/Engineering measured at 57 ½ inches, Stage Craft Room measured at 57 ½ inches. Reach range is 40-48 inches maximum.
24. Emergency shower handle measured 70 inches in Room 212. Reach range is 40-48 inches maximum.

25. Emergency eyewash station works, however tags for testing are not being used in Rooms N229, N347, N351, and Woods/Engineering.

North Central High School Interviewees

Comments:

1. One Tribe Culture
2. Food and clothing bank in the main hallway for students to access.
3. Finances are never a barrier for students. Generous donors.
4. Working hard to break down barriers for students of color who aren't registering for AP classes.
5. Piloting an online registration.
6. Every Student Led Conference is translated into primary language. Use of Language Link.
7. Home visits are conducted a lot during the summer for at risk students.
8. District has worked on 504 documentation. Practice and paperwork.
9. Providing clear pathways and career opportunities
10. 7th grade Microbiology Curriculum
11. 8th grade Bio-Chemistry Curriculum
12. CTE teachers experience bias from other teachers not realizing the rigor, AP, dual credit, industry involvement, certificates/credentials, and real-world opportunities.
13. Have a strong sense of community
14. Students are good at advocating for themselves
15. Slowly adding back engineering classes.

Greatest challenges facing students:

1. Poverty and trauma
2. Not given a vision early in their lives
3. Trying to differentiate and accommodate all of the students
4. Balancing time to do advisories and CTSOs

Greatest challenges for teachers:

1. Not having enough time in the day to get things done.
2. Managing the use of cell phones in the classrooms can be stressful and draining.
3. Required to have a CTSO. How do you fund?
4. Have to do fundraising for students who can't afford to travel.
5. Culturally, students have a job after school and others must take care of family members.

Things would like to see changed:

1. Having the option for more classes outside the school day.
2. PE in the morning. Access more content with all of the state requirements.
3. Not so many assessments. Kids get stressed out and sick.
4. Allow students the opportunity to visit professionals outside of the building.

Most proud of:

1. Relationships have with the kids.
2. Proud of making an impact on kids.
3. Helping to change the trajectory of student's lives.
4. Helping first generation students to succeed, graduate and have multiple options for
5. Thankful and respectful for the trust given to us by families.
6. 8th graders in their biochemistry class are working on prosthetics
7. Four-year comprehensive genetics program.
8. Two students conducting poster presentations and oral presentations on bee research at Whitworth
9. Sequencing Boot Camp in Summer
10. The level of work and partnership the kids cultivate on their own.
11. Persistence of the students.
12. Students have empathy of knowing what it is to struggle. They get each other and give to one another.

Student Focus Group at North Central High School

Comments:

1. Culture of the school is welcoming
2. Diverse
3. Everyone cares
4. Can turn to anyone for help
5. Great environment and community
6. Nice school
7. Innovative
8. Choice school
9. Tend to push AP classes. Kids not aware of all of their options.
10. Bio-med progressive pathway from 9th to 12th grade
11. The ability to be able to work with professors as high school students
12. Hard to do fundraisers
13. Teachers are nice and friendly
14. Teachers are helpful
15. DECA store manager is passionate
16. Lots of opportunities
17. Adding a Lacrosse team
18. Love the school
19. Great relationships with teachers
20. Would like more students to get involved in sports: track, wrestling, golf, Frisbee, tennis, cross country, volleyball, softball, baseball, football.

Things they would like to see changed:

1. More help with college ideas and the process
2. More information about the rules for recycling
3. Recognition of all sports and clubs

4. Would like to see more students involved in sports: track, wrestling, golf, Frisbee, tennis, cross country, volleyball, softball, baseball, football, etc.
5. Open campus for senior and juniors
6. More classes offered in the Computer Science area
7. Funding distribution to the Arts/Drama

Most proud of:

1. School has much to offer students
2. Feel connected
3. "One Tribe"
4. Patriot Club
5. Stagecraft
6. Culinary
7. Principles of Engineering
8. AP Classes
9. Positive environment
10. Community
11. Relationships that are built with one another
12. How much the teachers care about the success and mental health of the students

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. District has 90 days to submit a Voluntary Compliance Plan (VCP). I will send VCP template. Need to indicate who is responsible for each finding. Need to indicate month and year for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. Please email or call with questions. I am here to assist throughout the process.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Skykomish School District
MOA Civil Rights Onsite Review Exit Meeting Notes
April 12, 2019

I thanked the team for their hospitality.

I stated I would provide Thomas Jay, Sonia Bartosek, Christine Daniels, Todd Greene, and Chad Musser with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

The following information is not inclusive of everything observed or noted:

Administrative

1. The Annual Nondiscrimination Statement has not been done.
2. Comprehensive Nondiscrimination Statement. There is inconsistency with what is published and disseminated.

The following information is not inclusive of all the areas measured or areas that will be addressed in the Letter of Finding.

Facilities Accessibility | Skykomish

1. Need directional signage at the Entrance and along the path of travel indicating location of accessible entrance.
2. There are several rooms that do not have signage.
3. Door pressure ranges were from 7 to 16 pounds of pressure consistently throughout the building. The maximum allowable pressure is 5 pounds.
4. Main Office counter height measured 46 inches. Accessible counter height is 34 inches maximum.
5. Tables/workstations have height ranges of 25 inches from ground floor to the bottom of the table to 31 inches to the top of the table in rooms B10, B90, 180, Staff Work Room/Lounge. In order to be accessible, the bottom of the desk/table/workstation is to be a minimum of 27 inches from the floor ground and 34 inches maximum at the top.
6. Drinking fountain by the lunch room measured 19 inches from the wall, drinking fountain by room B70 measured 13 inches from the wall, drinking fountain by Special Services measured 13 inches from the wall, drinking fountain by room 140 measured 13 inches from the wall, drinking fountain by room 250 measured 13 inches from the wall, drinking fountain by room 290 measured 13 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.

7. Fire extinguisher, across from women's restroom in Nurses' Office, B110, measured 6 inches from the wall, fire extinguisher in Special Services measured 5 inches from the wall, fire extinguisher outside of room 140 measured 5 inches from the wall, fire extinguisher outside of room 160 measured 5 inches from the wall, fire extinguisher outside of room 170 measured 5 inches from the wall, fire extinguisher by room 250 measured 5 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
8. First Aid Kit outside of room 170 measured 4 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
9. First Aid Kit in room 200 measured 62 inches from the floor ground. Reach range is 40-48 inches maximum.
10. Emergency Shower handle in room 200 measured 65 inches from the floor ground. Reach range is 40-48 inches maximum.
11. Eye and Skin Wash Kit in room 200 measured 50 inches from the floor ground. Reach range is 40-48 inches maximum.
12. Dishwasher pull down mechanism measured 63 inches from the ground floor and the Pro Pack Gloves measured 62 inches from the floor ground. Reach range is 40-48 inches maximum.
13. Food preparation table top measured 36 inches from the floor ground and the bar underneath measured 9 inches from the ground floor. There is no forward approach for individuals in wheelchairs.
14. Wash, Rise, Sanitize Sink has measurements from the floor ground to the top of the sink ranging from 12-35 ¾ inches. There is no forward approach for individuals in wheelchairs.
15. Boy's Locker Room, B31, is not accessible. It has no accessible restrooms and no accessible showers due to curb measuring 5 inches in height. Stairs lead to gym.
16. Girl's Locker Room, B60, is not accessible. There are 5 stairs to take to enter the locker room and 15 stairs to take to travel to the Main Office. Door width 27 inches.
17. Men's Restroom, B140, is not accessible due to the opening of the door and the partition wall being 29 inches wide.
18. Women's Restroom on the ground floor has sink pipes that are not insulated.
19. Restroom 210 is not accessible. There are 7 stairs.
20. Speech Room is not accessible. There are 7 stairs.
21. Coat hook height on ground floor Women's Restroom measured 60 inches in height from the ground floor. Reach range is 40-48 inches maximum.
22. Gym balcony is not accessible.
23. Stage is not accessible due to stairs.
24. Aisles configuration ranged from 27-28 inches in width in first floor Special Services and 20-21 ½ inches in width in Room 170 which does not allow for a clear path of travel of a minimum of 32 inches.
25. The outside playground equipment is not accessible due to bark, which is not a firm, stable or slip resistant surface.

Interviewee Comments:

1. New website through Puget Sound ESD
2. Working with WASDA to update the policies
3. Use Safe School Alert
4. Hiring is done through Fast Track
5. Advertise in newspapers: Monroe Monitor or the Everett Herald
6. Post positions at the Post Office and the community as well
7. Salaries are set through Union negotiations, PSE and WEA
8. TPEP is done by superintendent
9. Everyone is Union except HR and Superintendent.
10. Considering offering more online CTE and career pathway courses
11. In the summer students can attend Sno-Isle TECH
12. Students have the option of doing Running Start at Everett Community College
13. Some students will not advocate for themselves
14. Socialization issues, mostly in middle school
15. Students struggle with integrating outsiders
16. Teaching tolerance
17. Building relationships
18. Working on getting additional services from King County to support student's behavioral, social and emotional needs
19. Looking at ways to go to college fairs, job fairs in order for kids to see opportunities outside of the town
20. Bring in guest speakers
21. Take virtual field trips
22. Applied to have the SAT available at the school
23. Expand job shadows
24. Leader in Me Program began last year. Two days this year.
25. Should provide Title IX training to staff.
26. Teachers meet weekly on Fridays
27. Superintendent meets once a month with all staff, including the counselor and nurse
28. School on the inside looks like a museum
29. School has white walls and would like to take down old pictures and create classroom murals for the 4-5 grades and 6-8 grades
30. Just recently able to put up pictures on the walls. Thankful.
31. The students have needs and we meet them where they are at
32. High school students are scared to leave the community and to travel, especially on a plane
33. Work on ways to calm the body with students
34. Provide hands on, rigorous, relevant CTE courses that give student's the skills and knowledge necessary to enter the workforce or continue their education.
35. Provide extended learning and leadership opportunities.
36. Student and Staff Handbooks are being reviewed professionally
37. Updated Emergency Management this year
38. Tip line is used if have a grievance or to report something
39. Serve low income families

40. No ELL students. If needed contact ESD. Use of Language Link.
41. Provide restrooms that aren't gross. Can't touch anything.
42. The restroom added on the third floor has no running water
43. The classified staff do not get along well
44. Have and increase in special education needs
45. SPED students need more time to work on math. The current curriculum rushes through concepts.
46. Paras are provided in math and science
47. Multiple accommodations are given to students based on individual needs. i.e., laptops with camera, rolling backpack, braille, readers that follow along with text, text to speech, audio books, moving closer to the board, seating, opening or closing the blinds, modified curriculum, oral tests, extended time for homework and tests, etc.
48. Looking at grants for elliptical bikes
49. Would like to have a woodworking class
50. Being able to create curriculum for elementary. Cultural aspects are important.
51. Feel supported

Barriers in the School:

1. Stairs
2. The wheelchair lift is unsteady and broken frequently
3. Do not have an elevator
4. Community Center has a separate fire alarm system that is not linked to the school

Greatest challenges:

1. Parental involvement
2. Lack of hope or low expectations of the family
3. Showing students the visual accomplishment of obtaining a career and/ or going to college. This is not modeled enough.
4. Helping students realize there is great job out there that doesn't require college.
5. Helping students to find their path.
6. High depression levels of high school students
7. Providing opportunities for students they wouldn't find for themselves, like going to Seattle
8. Some families live in isolation, off the grid
9. Outdated curriculum
10. Budget
11. ADA compliance
12. Making improvements is daunting because of costs
13. Socialization skills
14. Having administrator with kids at the school
15. Lack of trust
16. Collegiality or trust with one another
17. Variety of personalities and people

18. Not having an administration team. One person does the hiring, observations, reviews, firing, etc. No one else to go to. No accountability.
19. Multiple classes to prepare for. Sometimes get overwhelmed.
20. Unique challenges
21. Staff members are also Board members. Conflict of interests.
22. Distance to other learning centers

Things would like to see changed:

1. More students and larger classes
2. More diversity
3. Social justice training for all staff
4. Equitableness with discipline
5. Additional special education services
6. Have a fitness center
7. Students can participate in sports at Sultan, but there is no transportation. It is a barrier to play at another school.
8. Basketball to be offered again. No basketball in the last two years.
9. Sports survey indicated students would like to have kick boxing offered
10. Have music notation system
11. Have a sound system
12. Have a beginning and concert band class
13. Have a jazz band class
14. Set up a culture of trust and the opportunity to fail and learn from it
15. Sense of entitlement
16. So many hats and challenges
17. Put in an elevator
18. Create more opportunities. Hands-on, experiential learning.
19. Go out into the community
20. Go on more field trips, i.e., WE Day in Tacoma
21. Be able to travel to Seattle to visit colleges, businesses, and attend performances, Broadway productions, etc.

Most proud of:

1. Great teachers!
2. Investing in students and their learning
3. People are kind and helpful
4. Kids feel comfortable
5. Book selections
6. How student's lives are changed through music
7. Watching students grow and mature
8. How much we do for the students, considering how small we are
9. Acquiring an Intervention Specialist
10. Helping students get over their fears, work out problems, stay in school and be successful.
11. Love the kids! They are delightful, joyful and work hard.

12. Connection with DVR. Willing to do a lot more for our students.
13. Obtaining the Best Start for Kids grant. \$200,000 to implement.
14. Culture and attitudes are changing
15. Setting standards and moving in the right direction
16. Provide stability for the students. Breakfast, lunch, after school snack.
Summer program. Summer meal program.
17. Making a difference in the lives of students
18. Love the people I work with and the kids!

Student Focus Group Comments:

1. Very welcoming
2. Treated like family
3. Leadership program
4. Would be nice to have a place that is quiet and comfortable
5. Keep to myself and do my best to get through the day
6. Staff watching and following students to the restrooms
7. Staff overbearing and controlling. No trust. Don't listen.
8. Administration doesn't believe their kids behave the way they do
9. Not allowed anytime to yourself
10. Not allowed to be in the hallways
11. Some teachers have hall passes, others don't have as many
12. Not able to bring computer into cafeteria
13. Lack of respect
14. Bringing situations forward to administration and nothing is done about it because student(s) is/are their child
15. Some students are permitted to get away with things they say and do. Favoritism.
16. Open campus as long as you have a certain GPA and have paperwork signed
17. Nice place
18. Gym is nice
19. Have teachers can talk to and trust

Things would like to change:

1. Would like to have more "hands on" classes, i.e., woodshop, working with animals, etc.
2. Have a jazz band class
3. Have girls basketball
4. Rooms are confined and doors locked
5. When working as a T.A. in elementary, not allowed to go through the copy room. Have to go all the way around.
6. Not allowed to go through the library, must go around the school
7. During break time, not allowed to be in the halls. Can only go to teachers when available.
8. Better soccer fields and equipment
9. Be allowed to be more independent and not treated like young children
10. Open curtains

11. Have assignments graded in a timely manner. Sometimes have to wait for weeks/months. This impacts the opportunity to get feedback and do well in the class.
12. Trust and respect. Would like to have voice listened to and heard. It goes both ways.
13. Water fountains have white stuff coming out of them and the water is warm. Not safe to drink.
14. Have a student homework area
15. Like to do more activities outdoors

Things most proud of:

1. School is good
2. Art program
3. Band
4. Fellow classmates
5. Leadership program
6. Gym is nice
7. Announcements
8. Food is good
9. Close to one another and can tell if something is wrong
10. Want to help one another
11. Protective of one another

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. I will send VCP template. District has 90 days to submit a Voluntary Compliance Plan (VCP). District to indicate who is responsible for each finding. Need to indicate month and year for corrective action to be done for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. Please email or call with questions. I am here to assist throughout the process.

Again, thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*

- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability*;
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Therefore, school district individuals may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

I will be preparing an official Letter of Finding. In the meantime, if you have questions, please give me a call or email me.

Thank you.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Renton School District

MOA Civil Rights Onsite Review Exit Meeting Notes

April 26, 2019 | 2-3 PM

Thanked the team for their hospitality.

I will provide Dr. Pattenaude, Kevin Smith, and Todd Simanton with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

The following information is not inclusive of everything observed, noted or measured that will be addressed in the Letter of Finding.

Facilities Accessibility| Renton High School

1. Need signage identification for rooms, i.e. Community and Schools Room, Women's Team Locker Room, etc. Some signs are covered, i.e. Career Center.
2. Need to display the International Symbol for Accessibility on the signage to the accessible restroom in the Wellness Clinic.
3. Door pressure ranges measured 7-26 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
4. Drinking fountain button/bar pressure ranges measured 7-16 pounds of pressure. The maximum allowable pressure is 5 pounds.
5. Student Store has varied shelf reach ranges measured 53-77 inches. Reach range is 40-48 inches maximum.
6. Paper towel dispenser height ranges measured 41-61 inches. Reach range is 40-48 inches maximum.
7. Coat hooks height ranges measured 64 1/2-79 inches, i.e. Admin/Office Restroom, Room 164, Wood Shop, Men's Locker Room, Green Room Dressing Room B, etc. Reach range is 40-48 inches maximum.
8. Towel rack height ranges were from 62-65 1/2 inches, i.e., Men's Locker Room and Women's Team Locker Room, etc. Reach range is 40-48 inches maximum.
9. First Aid Kit height measured 69 3/4 inches in Room 329. Reach range is 40-48 inches maximum.
10. Fire Blanket latch height measured 72 1/8 inches in Room 329. Reach range is 40-48 inches maximum.
11. Emergency shower handle height measured 65 inches in Room 321. Reach range is 40-48 inches maximum.
12. Eyewash stations in various rooms have inspection tags, some do not, but are not filled out. No consistency in testing eyewash stations.

13. Student workstations/tables are not adjustable in Room 347, Room 366, Room 367, and Room 368.
14. Aisles configuration measured 21-28 inches in width in Room 164, 19-29 inches in width in Room 346, which does not allow for a clear path of travel of a minimum of 32 inches.
15. Protruding objects: Fire extinguishers, AEDs, drinking fountains, paper towel dispensers, sanitizer dispensers, fire blankets in various locations. Items measuring 4 inches from the wall are considered protruding objects.
16. There is a 3/8 inch lip to the shower area in the Women's Locker Room and Women's Team Locker Room. This area is not accessible due to the barrier.
17. Men's Locker Room Shower Stall has a 5 inch curb making it not accessible.
18. Women's Restroom, third floor, has a sink carousel with three faucets that measured 15, 20 and 21 pounds of pressure. The maximum allowable pressure is 5 pounds.
19. Pipes underneath restroom sinks were not insulated in various locations.
20. North and South Upper Gym is only accessed by stairs. Not accessible.
21. Mirrors exceed 40 inches from the ground floor to the bottom of the mirrors in the Performing Arts Center restrooms.
22. Performing Arts Center accessible seating needs to be identified by the International Symbol for Accessibility.
23. Performing Arts Center Stage Lighting and Sound Booth are not accessible.
24. The teaching area in Room 328 for students is theater style with stairs on both sides. Not accessible.
25. Elevator by the Main Office has vinyl flooring with a 2 inch x 1 inch open worn patch.
26. Commons tables are not accessible. Seat to seat width measures 14 1/2 inches and from the ground floor to the bottom of the bar measures 26 inches.
27. North Parking Lot has accessible parking signage that measures 32 inches and 39 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
28. The West Parking Lot has accessible parking signage that measures 36 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
29. The South Parking Lot has accessible parking signage that measures 43 inches and 45 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
30. The East Parking Lot has accessible parking signage that measures 36 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

Facilities Accessibility| Renton Academy

1. Door pressure ranges measured 10-14 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
2. Drinking fountain button/bar pressure measured 8 pounds of pressure in Room 2, Room 4 and Room 5. The maximum allowable pressure is 5 pounds.
3. Sink/Eyewash Unit in Room 4, Room 6, Room 17, Room 321 did not have an inspection tag of when it was last tested.
4. Sink pipe is not wrapped or insulated in Room 17.

5. The faucet controls (some cold and some hot) in the restrooms remain on for 1 second. Minimum time to remain open is 10 seconds.
6. Paper towel dispenser height measured 56 inches in Room 8. Reach range is 40-48 inches maximum.
7. Coat hooks height measured 64 inches in the Women's Restroom and Men's Restroom and 67 inches in the Staff Restroom. Reach range is 40-48 inches maximum.
8. Fix seating in Room 6 and Room 9.
9. Protruding Objects: AED measured 7 inches from the wall by the Main Office. Items measuring 4 inches from the wall are considered protruding objects.
10. Multipurpose Room has a stage that is not accessible due to stairs.
11. The West Parking Lot has 2 accessible parking signs that measure 57 inches from the ground floor to the bottom of the signs. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
12. The South Parking Lot has 2 accessible parking signs that measure 48 inches from the ground floor to the bottom of the signs. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

Facilities Accessibility | Albert Talley High School

1. Door pressure ranges measured 10-31 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
2. Library security gates have width ranges that measured 18-21 inches. This does not allow for an accessible path of travel.
3. Drinking fountains have various button/bar pressure ranges measuring 5-11 pounds of pressure. The maximum allowable pressure is 5 pounds.
4. Paper towel dispenser height measured 61 inches in Otter Bay Cafe. Reach range is 40-48 inches maximum.
5. Men's Restroom, Room 132, faucet controls (hot and cold) remain on for 1 1/2 seconds. Minimum time to remain open is 10 seconds.
6. Family and Consumer Sciences Room 160 magnetic knives strip measured 57 1/2 inches from the ground floor to the middle of the strip. Reach range is 40-48 inches maximum.
7. Coat hooks height measured 70 inches in the Main Office Women's Restroom. Reach range is 40-48 inches maximum.
8. Aisle configuration ranges measured 15-20 inches in width in Room 180, which does not allow for a clear path of travel of a minimum of 32 inches.
9. Safety goggle storage opening height measured 65 inches in Room 182, 69 inches in Room 184, and 89 1/2 inches in Room 241. Reach range is 40-48 inches maximum.
10. Emergency shower handle height measured 68 inches in Room 241. Reach range is 40-48 inches maximum.
11. Student workstations/desks are not accessible in Rooms 160, 190, 191.
12. Protruding Objects: AED measured 7 inches from the wall and Fire Pull Station measured 5 inches from the wall across from the Gym on the First Floor. Items measuring 4 inches from the wall are considered protruding objects.
13. The North Parking Lot has faded white lines and faded blue International Symbol for Accessibility.
14. The East Parking Lot has a total of 98 parking spaces, 2 are accessible. The minimum number of required accessible parking spaces is 4.

Facilities Accessibility| Hazen High School

1. Door pressure ranges measured 12-25 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
2. Student workstations/tables in various room are adjustable; however, there is a bar that measured 22-25 ½ inches from the ground floor. Knee clearance is a minimum height of 27 inches from the ground floor.
3. Aisle configuration ranges measured 10-20 inches in width in Room 104, which does not allow for a clear path of travel of a minimum of 32 inches.
4. The Lecture Hall in Room 226 has 16 stairs on both sides. Not accessible.
5. Paper towel dispenser height ranges measured 51-59 inches in various rooms. Reach range is 40-48 inches maximum.
6. Soap dispenser height ranges measured 48 1/2-50 inches in various rooms. Reach range is 40-48 inches maximum.
7. Coat hook heights measured 66 3/4 inches in the Main Office Women's Restroom, 66 1/2 inches in the Main Office Men's Restroom, Women's Restroom, 610, measured 50 inches, Women's Restroom, 703, measured 67 inches, Room D102 measured 69-72 inches. Reach range is 40-48 inches maximum.
8. Women's Restroom, 144, and Men's Restroom, 146, accessible stalls had no latch on the outside of the door.
9. Emergency shower handle height measured 68 inches in Room D102. Reach range is 40-48 inches maximum.
10. Eyewash stations in various rooms have inspection tags, some do not, but are not filled out. No consistency in testing eyewash stations.
11. First Aid Kit latch height measured 59 inches in Room 138. Reach range is 40-48 inches maximum.
12. Goggle Center lock height ranges measured 50 inches in Room D102, 58 inches in Room 138 and Room 143, and 58 1/2 inches in Room 237. Reach range is 40-48 inches maximum.
13. Fire Extinguisher handle height measured 71 inches in Room 141, 68 inches in Room 143, and 57 1/2 inches in Room 708, 55 inches in Room 709, 57 inches in Room 713. Reach range is 40-48 inches maximum.
14. The Edge Café syrup shelving height range measured 69-81 inches. Reach range is 40-48 inches maximum.
15. Drinking fountains have button/bar pressure ranges that measured 6-22 pounds of pressure. The maximum allowable pressure is 5 pounds.
16. Main Gym drinking fountains are not accessible due to 6 inch curb lip.
17. Men's Locker Room 504M accessible shower stall is being used for storage.
18. Varsity Locker Room 619 shower area is not accessible due to 3 inch and 8 inch curbs.
19. Protruding objects: Fire extinguishers, AEDs, drinking fountains, safety goggle centers, paper towel dispensers,-sanitizer dispensers in various locations. Items measuring 4 inches from the wall are considered protruding objects.
20. Commons tables are not accessible. Round tables: bar height underneath the tables measured 22 inches from the ground. Rectangular tables: bar height underneath the table measured 25 1/2 inches from the floor ground.
21. Elevator 2 ride from floor to floor was bouncy. Maintenance.
22. Path of travel from accessible parking space to Performing Arts Center is over 400 feet.

23. Performing Arts Center stage is not accessible due to a set of 6 stairs on both sides of the stage.
24. Performing Arts Center platform lift to the stage was not operational nor accessible.
25. Performing Arts Center sound and lighting booth is not accessible due to 2 sets of stairs on both sides.
26. 100 K ramp ranges from 8.4-9.2 percent. The maximum incline measurement is 8.33 percent.
27. Ramp by elevator and Room D206 has incline middle ramp measurement of 9.5 percent. The maximum incline measurement is 8.33 percent.
28. Staff and Pool Parking Lot has accessible parking signage that measures 38 inches and 40 inches from the ground floor to the bottom of the 2 signs. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
29. East Parking Lot striping in some areas does not line up with the signage as well as not lining up access aisle without being impeded by a curb ramp.
30. The East Parking Lot has 6 accessible parking signs that measure 28-43 1/2 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
31. The South Parking Lot has a total of 131 parking spaces, 2 are accessible. The minimum number of required accessible parking spaces is 5.
32. The South Parking Lot has 2 accessible parking signs that measure 28-32 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
33. The North Parking Lot has a total of 101 parking spaces, 2 are accessible. The minimum number of required accessible parking spaces is 5.
34. The North Parking Lot has 2 accessible parking signs that measure 40 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
35. The West Parking Lot has a total of 122 parking spaces, 3 are accessible. The minimum number of required accessible parking spaces is 5.
36. The West Parking Lot has 3 accessible parking signs that measure 37-43 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
37. The Tennis Parking Lot has 122 parking spaces, none of which are accessible. The minimum number of required accessible parking spaces is 5.

Facilities Accessibility | Lindbergh High School

1. Door pressure ranges measured 9-17 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
2. Student workstations/tables/desks in Room 255A measured 25 inches from the ground floor to the bottom of the workstations/tables/desks, in Rooms 310A and 310C measured 24 inches from the ground floor to the bottom of the workstations/tables/desks, in Room 320F the bar measured 21 inches from the ground floor to the bottom of the workstations/tables/desks. Knee clearance is a minimum height of 27 inches from the ground floor.
3. Aisle configuration ranges measured 15-21 1/4 inches in width in Room 300A, which does not allow for a clear path of travel of a minimum of 32 inches.

4. Paper towel dispenser height ranges measured 55-64 inches in various rooms. Reach range is 40-48 inches maximum.
5. First Aid Kit height latch measured 55 inches in Room 310D. Reach range is 40-48 inches maximum.
6. Safety Goggle Center lock height measured 50 inches in Rooms 310A and 310C. Reach range is 40-48 inches maximum.
7. Coat hook height measured 67 inches in Room 310A. Reach range is 40-48 inches maximum.
8. Eyewash stations in various rooms have inspection tags, some do not, but are not filled out. No consistency in testing eyewash stations.
9. Drinking fountains have button/bar pressure ranges that measured 5-11 pounds of pressure. The maximum allowable pressure is 5 pounds.
10. Pool: Drinking fountains button/bar pressure ranges that measured 7-9 pounds of pressure. The maximum allowable pressure is 5 pounds.
11. The maximum allowable pressure is 5 pounds.
12. Room 261B restrooms are not accessible. Door width measured 27 inches.
13. Room 261C is not accessible. Door width measured 29 inches.
14. Gym Women's Restroom, 245C, Women's 3rd Floor Restroom, Men's 3rd Floor Restroom do not have accessible restrooms.
15. Men's Locker Room, Room 145, has 2 screws and bolts 3 inches in height and 5 inches in width. Safety issue.
16. Protruding objects: Fire extinguishers, AEDs, drinking fountains, safety goggle centers, paper towel dispensers, sanitizer dispensers in various locations. Items measuring 4 inches from the wall are considered protruding objects.
17. Commons tables are not accessible. Rectangular tables with round seats: bar height underneath the tables measured 25 1/2 inches from the ground. Rectangular tables with bench seats: bar height underneath the table measured 26 1/4 inches from the floor ground.
18. Performing Arts Center stage is not accessible due to a set of 6 stairs on both sides of the stage.
19. Performing Arts Center sound and lighting booth is not accessible due to 2 sets of 11 stairs on both sides.
20. Performing Arts Center has 5 ramps that exceed 8.33 percent.
21. East Lot Ramp has a long ramp and 1 of the 4 incline measurements had a range of 7.8-8.7 percent. The maximum incline measurement is 8.33 percent.
22. Elevator 2 is not working due to burnt out circuit board.
23. Pool: Drinking fountains, in the lobby, measured 19 inches from the wall. Drinking fountains, in the pool area, measured 19 inches from the wall. This is considered to be a protruding object.
24. Pool: The designated seated viewing area is not accessible due to stairs.
25. Pool: Door pressure ranges measured 8-11 pounds of pressure throughout the building.
26. The East Parking Lot has 2 accessible parking signs, 1 measures 45 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
27. The South Parking Lot has a total of 205 parking spaces, 5 are accessible. The minimum number of required accessible parking spaces is 7.

28. The South Parking Lot has 5 accessible parking signs, 2 that measure 58 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
29. The West Parking Lot has 6 accessible parking signs that measure 59 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

Student Focus Group at Renton High School

Comments:

1. School has a lot of variety
2. Here for IB program
3. Easy to fit in
4. Great interactiveness
5. Can connect through sports
6. People are approachable
7. Good relationships with teachers
8. Staff very respectful
9. Safe environment
10. Easy to make connections
11. Not a lot of school spirit
12. Teachers are outgoing
13. Difficult to have time with counselors
14. Running Start students are left out a lot

Things they would like to see changed:

1. School pride, spirit and assemblies
2. Later start times
3. Better integration of Running Start students
4. Additional classes for students who want more besides computer classes, i.e. forensics, anatomy, criminal justice, etc.
5. DECA student recognition
6. Lots of people immigrate here. Help them to get resources. Many of them are lost and don't know what to do.
7. Basketball receives the most attention. Would like equitableness with all of the sports.
8. Clubs are the lowest tier of importance and recognition
9. Music department doesn't receive respect or attention
10. Lack variety of foreign language offerings
11. Approach with counselors and making people feel valued

Things they are most proud of:

1. Big Multi-Cultural Event
2. IB Math/Trigonometry
3. IB diploma opportunity
4. Leadership class
5. ASB and student council

6. Basketball team
7. Tremendous teachers
8. Teacher connections with students
9. JAG
10. CTE classes that lead to careers
11. Art walk
12. Scholarships for college

Student Focus Group at Renton Academy

Comments:

1. Teachers try to set a good vibe
2. The school is too small to have clubs
3. Built for kids that are meant for jail
4. Teachers have an attitude
5. Teachers are kind of unprofessional
6. Never told what my goal was to get out of here. Tell me something. Let me know I'm getting somewhere.
7. After I graduate, I'm thinking about cooking
8. Go to college and work in research facilities for biochemistry
9. Go to college to become a lawyer
10. Received scholarship to go Seattle University

Things they would like to see changed:

1. The rules--we can't leave without permission
2. The food isn't good. They give out sack lunches. The cereal is expired. Moldy cheerios.
3. New training for staff members—the way they handle conflict
4. Teachers raise their voices
5. The use of profanity and derogatory language used by the teachers to the students
6. Teachers don't pull us aside; they say everything right there in front of everybody
7. Teachers try to embarrass students in front of other students
8. The circle at this school never helps--there's always a fight in the circle
9. Need a hall monitor or security guard

Things they are most proud of:

1. This school was the best option for me because at least they want me to succeed
2. That I'm about to leave
3. That I have an idea for a support group so you can share what's keeping you down in your life

Student Focus Group at Albert Talley High School

Comments:

1. Welcoming and friendly
2. Pretty diverse
3. ELL students are treated like real students
4. Teachers treat us like young adults
5. Teachers are really nice
6. It is easy to build relationships with the teachers
7. Talley High School is a school of choice
8. Hands-on CTE classes
9. Able to receive credit for working
10. The energy is low. We don't all get along
11. Some name calling and bullying for trans or overweight students
12. My favorite school in the district—I've been to three different schools
13. School has been good about resolving issues
14. The sit-down restorative conferences are really good
15. Variety of clubs and activities
16. Flexible to meeting student's learning needs
17. Online options—go as fast as you want
18. Flexible learning schedule
19. Able to make decisions about my education
20. Great Career Center
21. Running Start opportunity

Things they would like to see changed:

1. Mental health awareness
2. Expanding more classes so we can have more hands-on classes instead of online
3. All classes should be taught by a teacher, especially math
4. Our diversity is great, but we need to celebrate more. Celebrate Black History month
5. Add a language class
6. We need a pool. Hazen and Lindbergh have a pool. Not equitable
7. Build something outside like a courtyard or tables
8. Offer additional after school activities
9. Additional field trips
10. Open campus

Things they are most proud of:

1. Teachers who do check-ins and care
2. Teachers are emotionally connected
3. Teachers don't give up on you and actually want you to do great
4. The teachers support you because they don't know what goes on at home and they want you to succeed
5. Teamwork of staff to meet student's needs to help grow and succeed
6. High expectations with options
7. Our diversity

8. Accepting
9. Career exploration with CTE
10. Culinary and Otter Bay Café
11. Project-based learning
12. Access to AP online courses
13. Band
14. Green Team and sustainable practices
15. Clubs: Board game, soccer, DnD, film, drama, health, culinary
16. Able to select classes and find out what I like and don't
17. The teachers don't look at it as a job, but how can they make the generations better

Student Focus Group at Hazen High School

Comments:

1. Welcoming place
2. School spirit. Each grade really participates
3. School spirit comes alive when competing against another school
4. Help is easy to find
5. People do their own thing and stick to themselves
6. Students are focused
7. Have own group of friends
8. Go to teachers before going to admin or counselors
9. Got rid of Culture Day
10. Difficult to get around the school
11. Students have a trusted teacher they can talk with
12. Something for everyone with clubs and sports

Things they would like to see changed:

1. Communication between teachers, students, staff, counselors and administration
2. The dynamic of how students are treated by security on campus
3. Add boy's volleyball and water polo
4. Have classes that provide for enriched career pathways and careers
5. Classes that prepare you for real life
6. Counselors and administration are always busy
7. Administration to listen more and take action vs. filing it away and not really addressing
8. There is not enough time with teachers, and yet the teachers are making great efforts
9. Need more staff and security guards
10. Counseling services. Write name on the list, wait a long time, and end up having teachers help to get things done
11. Have a room available for those with social anxiety
12. Setting up a system in which can talk with administration, without the fear of reprisals, in order to follow through and problem solve
13. Create a student focus group for administration to know what is going on. Would like this to occur every 6 months
14. Help with looking for job opportunities vs. college route
15. Have a culture that is united in order to have real change

Things they are most proud of:

1. The school
2. Students take action and get things done
3. Students are focused and competitive
4. Lots of opportunities here
5. Variety of classes
6. Many clubs. Proud of Latina Club
7. CTSOs: FBLA, DECA, HOSA and students competing in regional, state, and national
8. Able to make connections with students and teachers
9. Student community is one of the best
10. Celebrating each other as individuals

Student Focus Group at Lindbergh High School

Comments:

1. People are friendly
2. Easy to make friends if you want it
3. Lots of clubs to choose from
4. Many sports offered
5. Feels like a community vs. school
6. Diverse

Things they would like to see changed:

1. Discipline system
2. Hallways too crowded
3. Bathrooms are disgusting. No doors or toilet seat covers. Buttons on sinks missing.
4. Funding for clubs and activities, i.e., cross country, wrestling, swimming
5. Additional time for lunch. There are so many students and it is difficult to get through the lunch line. Not enough time to eat. Some teachers won't let you finish lunch in their rooms. Hungry
6. Teachers that are teaching in math and science. Need assistance with teaching strategies
7. AP course offerings for: AP Government, AP Humanities, AP Geography
8. Credit for community service hours
9. STEM program

Things they are most proud of:

1. Class options
2. Most teachers
3. Variety of sports
4. Jazz Choir
5. Orchestra
6. Electives
7. High school musical
8. Clubs and activities

Renton School District Staff Interviewee Comments

1. CTE is a viable option with multiple pathways and career opportunities
2. Shifted to trimesters this year
3. Engaging classrooms
4. Have Electives Fair
5. Trades Fair is a big deal every year
6. Top notch staff
7. "Good news" emails sent out weekly
8. Opportunities to educate employees and students regarding bias
9. 98-99 languages spoken in Renton School District
10. Translation services provided at all events
11. Use of Language Link, Language Bank, and Goggle translate
12. World Language is new this year
13. Starting Dual Language program
14. Registration materials available in several languages
15. Recruitment materials have been reformatted and updated
16. CTE is about opportunities for all students
17. CTE shift is where everything is going and levels the field
18. CTE is phenomenal
19. Paras are assisting in CTE classes for safety
20. Revamping of STEM. Moving to aerospace and robotics the last two years.
21. ELL students are often times placed in band, PE or art vs. more academic classes because there is an assumption, they can't handle the rigor
22. Safety training is a common area for translated documents. Spanish is the most common, some cases Russian
23. ELL students are under-represented in the Highly Capable program
24. Newcomer Family Orientation is vital to the community we serve
25. Person to person contact and communication is important
26. The quality of teachers impacts students
27. Samples of accommodations: more time, placement of seating, modified assignments, use of technology, assisted technology, printed notes/lecture, additional visuals, closed captions, etc.
28. Hazen High School counselors are invited and would like to visit the classrooms but don't have time due to their caseloads that are higher than Renton and Lindbergh High Schools.
29. Promotional materials are mostly in English that are sent out school wide. However, several flyers are available in Spanish, Vietnamese, Russian or Ukrainian. We could do a better job in this area
30. Lindbergh High School: The bathrooms. Some stalls don't have doors. Generally, we share with students. Some are far from classrooms. Student bathrooms are horrible!
31. Lindbergh High School: Safety. There are many interior classrooms with no interior windows. Have a lot of exterior doors that kids let other people in
32. Change Friday from late start to early dismissal. More kids would come on Friday
33. 1:1 chrome books
34. IB Program at Renton High School – 80% taking IB classes/IB career. Higher number of ELL and SPED

35. Concerned for students taking on too many AP classes—want them to sleep. Let kids be kids
36. Lack of mental health support coming into the school
37. Student to student bias has occurred due to culture or color
38. Extreme name calling by students or parents to staff
39. Expanded checklist when reviewing curriculum for bias
40. Area of growth is to have materials in other languages besides English
41. Looking at areas with an equity lens
42. 504 Coordinator SOPs being written and moving everything online. Rolled out the Skyward piece, provided trainings and follow up
43. The model of how 504's are created varies. Different schools have different models. Some schools try to get a time that works for all teachers to attend and one school has a standing teacher that tries to attend all meetings

Things they would like to see changed:

1. Increasing the diversity of the workforce to be a greater reflection of the population we serve. Predominately white. Identifying barriers
2. Breaking through the Renton Way. How things are processed. Language used
3. Broadening perspectives
4. Recruit and hire additional bilingual staff
5. Accountability in implementing ELL strategies, SIOP
6. Learn from one another
7. Smaller class size
8. Adjusting to trimester mindset
9. Pair teaching – two teachers per class. Opens up more teaching options
10. Balance of IEPs
11. Greater collaboration across departments
12. More PD in cultural competency
13. More district wide family engagement options
14. Listening to the whole story when a particular word has been used. Not making assumptions
15. More cohesiveness between all the schools in the district
16. More transparency and more communication
17. Appropriate PD for counselors, not just building focused. Have to seek it out and pay for it ourselves
18. Increased mental health services to be brought into the schools
19. Language and mindsets for students with disabilities
20. Collaboration: Going from more restrictive environment to least restrictive environment. All SPED classes are in one hallway. Concerned about how students feel about themselves or how others see them.
21. Increased accountability for teachers about keeping their online gradebook up to date
22. Advocacy for our LGBTW kids
23. More cultural awareness for teachers and students

24. Shift from students to taking all AP classes to incorporating more CTE course and pathway opportunities
25. Choose CTE as being this great beacon of hope, engaging, and relevant potential of changing the system
26. CTE course offerings and opportunities at Renton Academy
27. Balance of gender in classrooms

Greatest challenges:

1. How to meet the needs of every student who comes into the classroom and not limiting them
2. How to communicate with families—language barriers and awareness about American system
3. Getting parental involvement
4. Attendance, especially first period
5. Students who have been exposed to trauma
6. Some students don't feel safe or included
7. Competing initiatives
8. Diversity of workforce
9. Still a lot of room for growth in us growing teachers of color, specifically African American males
10. Not enough time
11. Work life balance
12. CTE teachers have at least three preps, put in hundreds of extra hours for research and own PD, come in on the weekends just to keep up on grading.
13. CTSO advisor and receive \$400 a year vs. other districts who pay \$3,000.
14. Support teachers need for the classroom
15. Have excellent Education Technology Department, but we don't have the budget for the best software. Find workarounds.
16. Quality of instruction vs. levels of success
17. New math adoption
18. Renton Innovation Schools
19. High poverty. MOU created for staff to meet certain guidelines.
20. District compliance
21. Lindberg High School's sprawling campus: buttons in and out of buildings, door assists, lots of portables, ramps, restrooms, access to elevators and keys, pool lift working condition limits access to be able to swim
22. Proper lighting, sound, signage, ramps for students with disabilities
23. Talley High School's health room: ingress and egress—three turns to get to changing area
24. Fieldtrips for students with disabilities has been an issue at times
25. Identifying barriers
26. Mental health and suicidal ideation of students

27. Student behavior and disciplinary struggles
28. Lack of respect from students
29. Fiscal side of students with poverty
30. Social media and cell phones
31. Challenges supporting issues students of color have. There are things they don't want to talk to a white counselor about
32. Increase numbers of females in STEM and robotics
33. Motivation of student who lack self-confidence that they can succeed
34. Canvas learning curve

Things they are most proud of:

1. Love our students
2. Students--Their ability to be engaged and their understanding
3. Feels like family here
4. Sense of empathy and embracing community
5. Welcoming, supportive, respectful
6. Have a system where everyone is committed to doing the right thing
7. Family Liaison Program does a great deal in identifying barriers and helps to remove them
8. Inclusiveness
9. Apprenticeships are open to everyone
10. Skills and technology we offer students
11. CTE department finds a way to get what the teachers request. Rarely, is it a no. It is great!
12. Improving graduation rates
13. Paradigm switch that all students don't have to go to college
14. Addition of the Before and After school care at Elementary School. Opportunities and space have benefited the employees, at a reduced cost, increases the potential to participate
15. Finger printing in house. Reduced the cost 1/3. \$50 instead of \$88. Turnaround time and access is immediate
16. Chill and spill art therapy group
17. Advocacy for our LGBTQ kids
18. Moving to the Generalists vs. Specialists
19. Staff relationships with each other and relationships with students
20. District and school board is very supportive of CTE
21. CTE Week. Lindbergh student recognized by Boeing
22. Focus funding with students with greatest needs
23. Latin organized dance
24. Renton Innovations Zone. National interest and replication of the project
25. IB is for all and not just for some
26. The confidence of the students has increase by taking IB classes
27. When I look at CTE and IB, it's the best of both possible worlds. It reaches all kids
28. Multicultural Week
29. Very intentional about hiring persons with disabilities, persons of different races, national origins, and genders

30. This is a place that cares about you as a person and wants to provide the best opportunity for your future
31. The new trimester system supports a wide range of elective options
32. Ability to meet kids where they are. Not matter where they are, we try to provide a solution for them despite background, ethnicity, ability
33. Love the opportunities we give our students

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. I will send VCP template. District has 90 days to submit a Voluntary Compliance Plan (VCP). District to indicate who is responsible for each finding. Need to indicate month and year for corrective action to be done for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. I am here to assist throughout the process. Please email or call with questions.

Again, thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability;*
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Therefore, school district individuals may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

I will be preparing an official Letter of Finding. In the meantime, if you have questions, please give me a call or email me.

Thank you.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Bainbridge Island School District

MOA Civil Rights Onsite Review Exit Meeting Notes

May 2, 2019 | 3-4 PM

Dr. Peter Bang-Knudsen, Sean Eaton, Glen Tyrrell, and Tamela VanWinkle were provided with:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

The following information is not inclusive of everything observed, noted or measured that will be addressed in the Letter of Finding.

Facilities Accessibility | Bainbridge High School

Building 100

1. Paper towel dispenser heights measured 57 inches in Room 102, 52 inches in Room 103, 50 inches in Room 109, 54 inches in the Men's Restroom, and 54 inches in the Women's Restroom. Reach range is 40-48 inches maximum.
2. Soap dispenser height measured 50 inches in height in Room 110. Reach range is 40-48 inches maximum.
3. Eyewash station spout height measured 48 inches in Room 109. Reach range is 40-48 inches maximum.
4. A-Med Wash Eye Wash Stations measured 60 inches in height in Room 109. Reach range is 40-48 inches maximum.
5. Desk width from one desk to another measured 20 1/2-27 1/2 inches in Room 110. This does not allow for an accessible clear path of travel of a minimum of 32 inches.
6. Fire blanket measured 67 inches in height in Room 110. Reach range is 40-48 inches maximum.
7. Door pressure ranges measured 6-12 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
8. Pencil sharpener measured 4 1/2 inches from the wall in Room 118. Items measuring 4 inches from the wall are considered protruding objects.
9. Drinking fountain button/bar pressure measured 15 pounds of pressure across from Room 116. The maximum allowable pressure is 5 pounds.
10. Drinking fountains across from Room 116: high fountain measured 13 3/4 inches from the wall and low fountain measured 19 1/2 inches from the wall, AED measured 6 3/4 inches from the wall across from Room 108 & 109, First Aid Kit measured 5 3/4 inches from the wall across from Room 108 & 109. Items measuring 4 inches from the wall are considered protruding objects.
11. Stage is not accessible. Has a set of stairs on both sides of the stage.

Building 200

1. Commons entrance, automatic door opener needs to have the International Symbol for Accessibility added.
2. Library checkout counter height measured 36 1/2 inches. The maximum height for accessibility is 34 inches from the finish floor or ground.
3. Drinking fountain spout height measured 42 inches from the floor ground by the Commons restroom, drinking fountain spout heights measured 37 inches and 43 inches by Room 220. The maximum spout height is 36 inches from the finish floor or ground.
4. Drinking fountain button/bar pressure measured 7 pounds of pressure by the Commons restroom. The maximum allowable pressure is 5 pounds.
5. Door pressure ranges measured 8-17 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
6. Paper towel dispenser height measured 53 1/2 inches from the finish floor in Room 215. Reach range is 40-48 inches maximum.
7. Sink/eyewash spout height measured 50 inches from the finish floor in Room 215. The maximum spout height is 36 inches from the finish floor or ground. Also, there was no inspection tag.
8. Coat hook height measured 56 inches in Room 201G. Reach range is 40-48 inches maximum.
9. First Aid Kit handle height measured 55 inches by the Commons. Reach range is 40-48 inches maximum.
10. First Aid Kit measured 6 inches from the wall by the Commons and fire extinguisher measured 6 1/2 inches from the wall by the Health Room, low counter measured 6 1/2 inches outside the Administration Office. Items measuring 4 inches from the wall are considered protruding objects.
11. Desk width from one desk to another measured 16 7/8 inches in Room 220. This does not allow for an accessible clear path of travel of a minimum of 32 inches.

Building 300

1. Ramp has incline ranges from 7.7 percent to 8.6 percent. The maximum incline measurement is 8.33 percent.
2. Door pressure ranges measured 11-17 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
3. Aisle width measured 28 inches in Room 303, Room 304, Room 305, Room 306. This does not allow for an accessible clear path of travel of a minimum of 32 inches.
4. AED measured 5 inches from the wall in Room 312 and Room 314, AED measured 7 inches from the wall outside Room 337. Items measuring 4 inches from the wall are considered protruding objects.
5. Fire extinguisher measured 5 inches from the wall in Room 316. Items measuring 4 inches from the wall are considered protruding objects.
6. AED handle heights measured 51 inches in Room 312 and 60 inches in Room 314. Reach range is 40-48 inches maximum.

7. Fire extinguisher handle height measured 52 inches in Room 313, drill press handle height measured 58 inches in Room 313, vice-grip jaws height measured 64 inches in height in Room 313. Reach range is 40-48 inches maximum.
8. Emergency shower handle height measured 56 inches in Room 312 and Room 315. Reach range is 40-48 inches maximum.
9. Paper towel dispenser heights measured 54 inches in the Men's Restroom and 54 inches in the Women's Restroom. Reach range is 40-48 inches maximum.
10. Drinking fountain spout height measured 41 inches from the floor ground by the North Exit. The maximum spout height is 36 inches from the finish floor or ground.
11. Drinking fountain button/bar pressure measured 9 pounds of pressure by the North Exit. The maximum allowable pressure is 5 pounds.

Building 400

1. Gym has benches on both sides with no ADA seating.
2. Drinking fountain spout height measured 38 inches in the Gym, drinking fountain spout height measured 41 inches in Room 409. The maximum spout height is 36 inches from the finish floor or ground.
3. There are 2 1/2 inch lip rises from the ground floor to circuit stations in the Weight Room. These areas are not accessible due to the barriers.
4. Drinking fountains measured 14 inches and 19 inches from the wall by the Weight Room and Elevator. Items measuring 4 inches from the wall are considered protruding objects.
5. AED measured 6 inches from the wall at the north entrance to the 400 building. Items measuring 4 inches from the wall are considered protruding objects.
6. Door pressure ranges measured 11-18 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
7. Coat hook heights measured 57 inches in the accessible stall in the Women's Lobby Restroom, 55 inches in the accessible stall in the Men's Lobby Restroom, 54 inches in the accessible stall in the Women's Locker Room and Men's Locker Room. Reach range is 40-48 inches maximum.

Building 500

1. There is a 3/4 inch lip rise at the door, a 1 inch lip rise to the mat and a 7 inch lip rise to the mat in Room 560. These areas are not accessible due to the barriers.

Building 600

1. Door pressure measured 30+ pounds of pressure to Room 177. The maximum allowable pressure is 5 pounds.
2. The drinking fountain is in an alcove and measured 29 1/2 inches wide. The drinking fountain is not accessible.

Pool & Parking

1. Door pressure ranges measured 8-11 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
2. Shower control height measured 54 inches in the Family Locker Room accessible shower. Reach range is 40-48 inches maximum.
3. Toilet seat cover dispenser height measured 55 1/2 inches in the Family Restroom accessible stall. Reach range is 40-48 inches maximum.
4. Towel hooks measured 64 inches from the floor. Reach range is 40-48 inches maximum.
5. Shower control height measured 57 inches and the soap dispenser height measured 51 inches in the Women's Locker Room. Reach range is 40-48 inches maximum.
6. Mirror measured 41 1/2 inches from the floor to the bottom of the mirror in the Women's Locker Room. Maximum height from the floor to the bottom of the mirror is 40 inches.
7. Dry Men's Restroom and Dry Women's Restroom are accessible. However, the signage does not have the International Symbol for Accessibility. Provide signage that includes the International Symbol for Accessibility.
8. Drinking fountain measured 19 inches from the wall by the NAKATA Room. Items measuring 4 inches from the wall are considered protruding objects.
9. North Ramp 1 has an incline of 9.2 percent in the middle. The maximum incline measurement is 8.33 percent.
10. Automatic door opener International Symbol for Accessibility signage is faded. Replace faded signage.
11. Aquatic Center Parking has three accessible parking spaces, one of which is designated as van accessible. The designated accessible parking spaces measured 95 inches in width and the designated van accessible space measured 94 1/2 inches in width. Car parking spaces shall be 96 inches wide minimum and van parking spaces shall be 132 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum.
12. Aquatic Center Parking has three accessible parking spaces, one of which is designated as van accessible, that have signage that measured 48 inches to 49 inches in height from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

Parking Lots

1. Front Parking Lot has 27 parking spaces, three of which are accessible. Accessible parking signage for A1 measures 57 inches from the ground floor to the bottom of the sign. A2 and A3 parking signage measures 53 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.
2. Front Parking Lot has faded white lines and a faded blue International Symbol for Accessibility.
3. Tennis Court Parking/Green Lot has 70 parking spaces, two of which are accessible. The minimum requirement is three accessible parking spaces. Provide one additional accessible parking spaces with access aisles.
4. Tennis Court Parking/Green Lot has accessible parking signage that measures 52 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

5. Tennis Court Parking/Green Lot has faded white lines and a faded blue International Symbol for Accessibility.
6. Tennis Court Parking Lot Ramp 1 had incline ranges from 6.9 percent to 12.1 percent and Ramp 2 had incline ranges from 8.4 percent to 8.9 percent. The maximum incline measurement is 8.33 percent.
7. Blue Parking Lot (by 500 Building) has two designated accessible parking spaces that do not have accessible signage. Provide accessible signage to be 60 inches minimum from the ground floor to the bottom of the sign.
8. Pit Parking Lot has 73 parking spaces, one of which is designated as accessible. The minimum requirement is three accessible parking spaces. Provide two additional accessible parking spaces with access aisles.
9. Pit Parking Lot designated accessible parking space has no ground markings of the International Symbol for Disability. Mark the accessible parking ground space with the International Symbol for Disability.
10. Pit Parking Lot has accessible parking signage that measures 42 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

Facilities Accessibility | Eagle Harbor High School | Commodore Options School

1. Sink/Eyewash water spout height measured 50 inches in Room 127. Reach range is 40-48 inches maximum.
2. Sink/Eyewash Unit in Room 127 did not have an inspection tag of when it was last tested.
3. Sink/Eyewash Unit in combined Room 507 & 509 had an inspection tag but there was no indication when it was last tested.
4. Lab/Apron hook height measured 58 inches in combined Room 507 & 509. Reach range is 40-48 inches maximum.
5. Coat hook heights measured 68 inches in Room 127, 65 inches, in the accessible stall, in the Men's Restroom by Room 503, and 56 1/2 inches, in the accessible stall, in the Women's Restroom by Room 503. Reach range is 40-48 inches maximum.
6. Door pressure ranges measured 7-13 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
7. Need signage identification for Room 203 and the Lower Gym.
8. Paper towel dispenser heights measured 50 inches in Room 108, 52 inches in Room 110, and 51 inches in Room 203. Reach range is 40-48 inches maximum.
9. Soap dispenser height measured 55 1/2 inches in Room 301. Reach range is 40-48 inches maximum.
10. Pipes underneath restroom sinks were not insulated in Room 108, Room 110, Men's Restroom and Women's Restroom by Room 503. Insulate pipes.
11. Pencil sharpener measured 5 1/2 inches from the wall in Room 513 and Room 515. Items measuring 4 inches from the wall are considered protruding objects.
12. Student workstations/tables in Room 517 are adjustable; however, they are not accessible, there is a bar that measured 25 3/4 inches from the ground floor and 22 inches in width. Knee clearance is a minimum height of 27 inches from the ground floor.

13. Portable ramp, Culinary and Early Childhood Development, has incline measurement ranges of 6.2 percent to 8.5 percent. The maximum incline measurement is 8.33 percent.
14. The path of travel from EHHS path to the Portable becomes inaccessible, due to bark and crushed gravel. The path of travel and ground surface needs to be stable, firm, and slip resistant.
15. Main Parking Lot has accessible parking signage that measures 42 inches from the ground floor to the bottom of the sign. The accessible signage should be 60 inches minimum from the ground floor to the bottom of the sign.

Facilities Accessibility | Woodward Middle School

1. Student workstations/desks are not accessible in Room 303. The bottom of the desk height measured 23 inches to 24 inches from the ground floor. Knee clearance is a minimum height of 27 inches from the ground floor.
2. Commons tables are not accessible. Tables measured 26 inches from the ground floor to the bottom of the table. Knee clearance is a minimum height of 27 inches from the ground floor.
3. Fixed seating in Room 101, Room 102, Room 103, Room 106, Room 208 and Room 210. The desks are not accessible.
4. Door pressure ranges measured 9-19 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
5. Paper towel dispenser height measured 51 1/2 inches in Room 304. Reach range is 40-48 inches maximum.
6. Mirror measured 45 1/2 inches from the floor to the bottom of the mirror in Room 301. Maximum height from the floor to the bottom of the mirror is 40 inches.
7. Sink/Drinking Fountain Unit lever pressure measured 8 pounds of pressure in Room 107, Room 108, Room 110; measured 7 pounds of pressure in Room 111, Room 216 and Room 302; and measured 9 pounds of pressure in Room 215. The maximum allowable pressure is 5 pounds.
8. Sink/Eyewash Unit eyewash spout height measured 43 inches from the floor ground in Room 316. The maximum spout height is 36 inches from the finish floor or ground.
9. Eyewash station in Room 304 had an inspection tag but there was no indication when it was last tested.
10. Emergency shower handle height measured 78 inches in Room 110 and Room 216. Reach range is 40-48 inches maximum.
11. Drinking fountain button/bar pressure ranges measuring 7 to 8 pounds of pressure by the Boy's Locker Room. The maximum allowable pressure is 5 pounds.
12. Drinking fountains by the Library measured 16 inches and 19 inches from the wall and drinking fountains by the Boy's Locker Room measured 15 inches and 19 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
13. Toilet seat cover dispenser heights measured 54 inches in the Lower Women's Restroom by the Library and measured 59 inches in the Boy's Restroom by 301 and the Girl's Restroom by Room 306. Reach range is 40-48 inches maximum.
14. Pipes underneath restroom sinks were not insulated in Restroom 200 and Restroom 202. Insulate pipes.

15. Ramp by Gym has incline measurements of 6.9 percent to 8.9 percent. The maximum incline measurement is 8.33 percent.
16. Ramp in the Commons has incline measurement of 5 percent to 11.1 percent. The maximum incline measurement is 8.33 percent.
17. Ramp by Band to Stage entrance has incline measurements of 7 percent to 8.5 percent. The maximum incline measurement is 8.33 percent.
18. Ramp to Stage has incline measurements of 7.5 percent to 8.4 percent. The maximum incline measurement is 8.33 percent.
19. Elevator, Commons to Library location, had a gap width of 1 1/2 inches on the Lower Level, a gap width of 1 3/4 inches on the First Floor. The maximum gap width permitted is 1 1/4 inches.
20. Fire extinguisher and pencil sharpener measured 4 1/2 inches from the wall in Room 111. Fire extinguisher measured 6 inches from the wall in Room 302. Items measuring 4 inches from the wall are considered protruding objects.

Student Focus Group at Bainbridge High School

Comments:

1. Welcoming environment
2. Everyone knows each other
3. Can be isolating at first, especially in sports
4. Teachers and staff are inclusive of students
5. Teachers are nice
6. Teachers know you and help
7. Teacher provide advice
8. Teachers and staff are incredible
9. Enjoy hands-on activities in CTE classes
10. Amazing and friendly Foods/Lunch staff
11. Homework and workload is manageable
12. Pressure to AP exams when take the class
13. Teacher has stated they would grade more harshly if the students don't take the AP test
14. Drinking fountains are broken
15. Proud of school
16. School spirit tends to decline after football season
17. Do lots of surveys
18. Many sports opportunities
19. Lots of clubs to choose from and participate

Things they would like to see changed:

1. More electives offered during Zero Hour
2. Additional parking spaces for students
3. Lower the \$250 parking pass fee
4. Make food more macro-nutrient dense
5. Change the block schedule
6. Plays and musicals during class time

7. Take AP classes just to challenge themselves; not worry about taking the AP test when completed the class
8. Drinking fountains that work, new ones put in

Things they are most proud of:

1. Variety of opportunities
2. Teachers help you with homework and help you get caught up
3. Like all of the teachers and coaches
4. Teachers and coaches are very understanding
5. Some teachers are amazing and others are not
6. Teachers work very hard to help student do well in their classes
7. Counselors help students find scholarships
8. Like the campus

Student Focus Group at Eagle Harbor High School

Comments:

1. School is a great fit
2. Great environment
3. Flexible
4. Smaller classes
5. Have a quiet place, Flex Room, to go to when dealing with anxiety
6. School fits learning needs
7. Contract opportunities
8. Created classes, IT essentials
9. Internships, Technology Department
10. Gates are a pain and difficult to navigate
11. Teachers are nice, listen to you, and they challenge you to be your best
12. Miss Trish as a teacher
13. Club offerings: Tech Club, Dungeons and Dragons (DND), Tea Club, Creative Writing and Book Club.
14. Literary Magazine off the ground. Recommend books for other students

Things they would like to see changed:

1. Want more CTE classes
2. Allow freshman to do contracts
3. Better planning/organization with teachers
4. Better connection with Bainbridge High School, e.g. assemblies
5. Communication in general between schools
6. Additional elective opportunities
7. More class options
8. Fill up the water jugs
9. Flex Room to be open more. Closed often and other times kicked out
10. Stop enforcing rules that make no sense
11. Gate and doors are locked most of the time and must go through the Main Office for safety. Setup a system where can key in ID number or scan in pin number

12. Infrastructure for technology
13. Need additional wrap around supports

Things they are most proud of:

1. Small school, everyone know everyone and is nice to each other
2. Contract studies
3. Summer contracts
4. Ability to do internships
5. Generally teachers are understanding
6. Flexibility
7. Learning styles and career interests
8. Not overwhelmed here
9. Teachers know what to do if students have anxiety or panic attacks
10. Connections with students and teachers
11. Students are not lost in the system
12. Everything is student driven
13. Teachers help you
14. Great small community
15. No mascot
16. Have own graduation ceremony. Colors are navy and silver

Student Focus Group at Woodward Middle School

Comments:

1. Welcoming and friendly
2. Great school and given more freedom
3. How teachers know you individually
4. Some teachers are harder on you than others
5. Able to talk about problems with teachers
6. Teachers have great connections with students
7. Lots of school pride and school spirit
8. A lot of respect for guests
9. Lots of cheering on for school teams
10. Preparation during 8th grade for high school
11. Lots of encouragement and opportunity to do what you want
12. Elective choices
13. Not a lot of options at lunch, e.g. library, band room, fuse ball, ping pong, outside
14. Teachers sharing political opinions in the classroom
15. Passing time is only 5 minutes
16. Not able to use the field
17. Water tastes like lead
18. Several clubs to choose from and participate
19. Sports opportunities, e.g. basketball, track, cross-country, volleyball

Things they would like to see changed:

1. Access to track and trails
2. More options at lunch
3. Teachers from sharing political opinions in class
4. Later start time for school and end later. Would be more productive
5. Vegetarian lunch options
6. Additional field trips and outdoor education
7. More than five minutes passing time
8. Have backpacks with us instead of going to the lockers
9. Able to use and play on the field
10. Have good tasting water
11. Cleaner bathrooms and drinking fountains
12. Offer Spanish

Things they are most proud of:

1. Really like the school
2. Everyone is friendly
3. Teachers greet you in the morning
4. Enjoy the education receive at the school
5. Teachers understand you
6. Teachers have a strong connection with students and make you feel safe and comfortable
7. Teachers have a good sense of humor
8. Everyone is supportive of one another
9. A lot of cool guests come in to share with the students, e.g. mayor
10. Student of the Month opportunities
11. Teachers tell stories about real life. They are relatable

Bainbridge Island School District Staff Interviewee Comments

Comments:

1. Students are able to select their classes. Use of course catalog, advisory, teachers give guidance, counselors provide outreach to students
2. AP course offerings and course equivalencies have increased, e.g. AP Economics, AP Statistics, AP Psychology
3. Removed the barrier of having to have a certain grade point to take the AP classes
4. Encourage student to take the AP test after taking the class
5. Scholarships available for test fees
6. High expectations for students on a four year track
7. Parent pressure and student pressure. Trying to change the mindset. Community shift
8. Explore more options: school-to-work, job coaching, internships, etc.
9. CTE is an area that has changed and grown. Offering multiple pathways
10. Several teachers that are on conditional and work on initial
11. Working with CTE teachers with CTSOs. State competitions and traveling to nationals. TSA and HOSA

12. Bringing in a trainer for Next Generation Science Standards. Not just looking at the standards but a way of teaching
13. Goal is to have all students experience a job shadow, internship with work-based learning in their junior/senior year
14. Career Fair and a separate night to focus on the trades
15. Bringing kids to the CTE office and library. ASFAB testing
16. Speakers come into the classrooms to discuss careers on a monthly basis
17. Getting students career ready and responding to the clientele
18. CTE General Advisory Board works to make certain CTE programs being offered are rigorous, based on industry-standards, relevant, hands-on learning that eventually leads to a certificate or industry certification with the opportunity to enter into a high-demand, high-wage career path
19. Majority of textbooks are online
20. Use of Google translate
21. Have a Spanish Emersion Program
22. CTE is coordinating with EL Coordinator and EL students regarding their schedule. Welding is offered at West Sound Tech. Woodward Middle School and working with females to try the Digital Design class. Use of google translate and school resources
23. Equity Team meets twice a month. Work as a whole staff. Communication. Student group works with teachers
24. EEOC policy is on the footer and on the website. Present throughout every webpage
25. Post job announcements and use of Fast Track for certified. Partner with Communications Department, e.g. social media, Twitter, Facebook, Instagram (Hoot Suite). WAVA and AWSP job boards, and post on Linked In.
26. Diversity of teaching staff across the state for teachers is increasing to represent the students they are teaching
27. Salaries are negotiated and set for both classified staff and certified staff
28. Safe places are identified throughout the building
29. Have conversations about racism and homophobia
30. Safety of students is a priority
31. Students watch out for one another
32. Impact of social media, sleep patterns and health
33. SOS curriculum with all of the freshman class. Empower them
34. Working with the Multicultural Advisory Committee
35. Many 504s, more so in high school. Very specific needs
36. Trust teachers to meet the student's need first. Communicate and leverage help
37. District does not have monthly counselor meetings. Different people assigned to testing, 504s, etc.
38. Disproportion of numbers in SPED with boys and students of color
39. There is a bias with female teachers who give massive amounts of detentions to boys
40. Bias Hunters and Bias Exposures. Learning so much
41. Curriculum and instruction looked at regarding equity and race
42. Native American history. Suquamish Tribal Center. Meet with tribal members
43. Bainbridge Youth Services are available to assist students
44. Healthy Youth Alliance invited guest speaker

45. One counselor assigned to meet individually with EL students and support them with course selections.
46. Trying to diversify the staff to reflect the student body
47. Students have chrome books. Phasing in
48. District provides Internet access at home
49. Use of laptops in Science
50. Receive professional development in school setting. Some is relevant and some is not
51. Take PD offerings outside of the district
52. Since Time Immemorial Curriculum training was incredible. There are 29 federally recognized tribes have endorsed the curriculum
53. Use of pod cast materials and evidence-based curriculum
54. Encourage Running Start and West Sound Tech. Feed passion and their learning
55. EHHS and Commodore has had many remodels and retrofits
56. Several entries and passageways are too narrow to get a wheelchair through
57. Need automatic door openers and auto assists
58. Try to modify the environment for students with disabilities. Start with technology in order for them to gain independence
59. Students are provided individual accommodations: Voice to text, note provide, differentiated instruction, scaffolding, close caption videos, modify written assignments, additional time for testing, quiet space for testing, increase font sized, translation of documents from English to Spanish, use of paras, all geometry work/curriculum in large print, use of microphones, chrome brooks, move to the front of class, etc.
60. Teachers are a part of the IEP and 504 plan process. Sit in meetings and asked for feedback
61. Para educators support students on a day-to-day basis where students can access wood technology or culinary
62. Careful and creative in how we help students with disabilities experience their education
63. Started a coffee service this year just for teachers, supporting the 18-21 student population gain skills needed to transition to work
64. If the kid can think of it, it is our job to make it happen!
65. Shift the curriculum to teach students what they care about helping them to see themselves in what they are reading or representing
66. Students have two jobs. Learn what is being taught and then communicate that you know it
67. Booster programs for clubs, sports and extra-curricular activities. People are willing to make donations and provide scholarships
68. Equitable resources and equal access for sports

Things they would like to see changed:

1. More planning time
2. Have a six-credit day and would like to have a 7th or 8th period day
3. Make it a requirement for students to job shadow and have an internship during their high school experience
4. Have a Native American Liaison

5. Focus on how to support students and staff. Happy and healthy
6. Student choice or empowerment. AP, CTE, or yoga class
7. Create a well-balanced life and pursue passions
8. Smaller number of students. Individualized learning
9. Help those kids who are struggling or behind to retake and get through it
10. Double the staff
11. Naviance system
12. Lots of students struggling with social and emotional needs
13. Addiction issues with students and sometimes angry parents
14. Mental health and anxieties of students
15. Need automatic door openers and auto assists
16. Offer Personal Finance at EHHS
17. Provide the list of CTE course offerings from BHS and EHHS
18. Communication
19. EHHS to have another math teacher
20. Get out of the way and provide the opportunities for students
21. Have SPED fully funded
22. More opportunities to have staff development
23. Provide teachers the opportunity and time to observe other teachers
24. Additional collaboration time. This is where the biggest growth comes from
25. Year-round school

Greatest challenges:

1. Having the time, space and tools to meet the kids where they are
2. Fitting in classes the students want to take
3. Students balancing their high expectations for themselves for a happy and successful life
4. Academic expectations
5. Culture puts pressure on for students to EXCEL. If not an A, failure.
6. Social expectations
7. Kids of privilege. Too much available to them
8. Students cutting themselves, self-harm, and exposure with drugs to help cope
9. Stress, anxiety, depression
10. Big toll emotionally on teachers who work and help their students with their needs
11. Class sizes
12. Kids are yearning for connections
13. There are so many amazing course offerings. Job and sports. It is a lot to juggle
14. Differentiation of instruction can be difficult
15. How to do your best and accept that you cannot do everything. Be happy people and avoid burn out
16. Suicide assessment
17. Suicidal ideation
18. Threat assessment

19. Kids who have ACEs and trauma
20. Many 504s, more so in high school. Very specific needs
21. Anxiety levels in test taking with students
22. Navigating student schedules. Working in two entities. My Registrar and Skyward. EHHS and BHS and have to toggle back and forth. It is a puzzle and difficult to get kids in those classes. Work with the principal
23. Lack of communication
24. Naviance website info system
25. EHHS receiving the same opportunities as BHS students, e.g. scholarship opportunities
26. EHHS students sometimes told classes are full and not able to take them
27. Students should have equal and equitable access to course offerings
28. Two sites with two different philosophies
29. Social media and social emotional health of kids. Making healthy choices
30. Providing relevant PD to teachers
31. Asking the teachers to do more and take on more roles
32. Teachers are stressed out. Trying to stay positive and take care of themselves
33. Strategies to work with kids. Don't have the options to give up
34. Time and not enough of it. The element that stands in the way of doing more
35. Ask a lot of the teachers all of the time.
36. EHHS teachers are one departments. Do so much more than other colleagues. Might feel isolated
37. Must promote programs in order to maintain, grow them and help students.

Things they are most proud of:

1. All about the kids and engagement with the community
2. A community that is passionate about kids
3. Connections with the students
4. A sense of family here
5. Staff who bend over backwards for students. Time, commitment and dedication
6. Students have at least one teacher they can connect with
7. EL and Special Education services
8. Importance of relationships
9. Changing the mindset of the community around CTE
10. Making connections with apprenticeship programs
11. Developing, creating and launching programs
12. Ongoing process to look for answers for the challenges we face
13. The work that we have been doing on Diversity, Equity and Inclusion
14. Distributive Leadership Model
15. DEI and how it influences their work
16. Shared understanding and mindful of it
17. Family engagement
18. Student voice

19. CTE and providing multiple pathways for students
20. Student performance
21. Have a high functioning school board, good thinkers
22. Social and emotional resources
23. Commodore Options is a school of choice and get in by lottery
24. By choosing small doesn't mean less. What you do choose is quality over quantity
25. Thinking outside of the box. Meet the needs of students who need support. Brilliant thinkers if given the freedom.
26. Continue to provide an option to traditional school. Keep growing and morphing
27. Love the marimba classes
28. Independent contracts
29. Diverse group and accepting
30. Freedom to have impact on students
31. The students curiosity and eagerness to learn
32. Getting to know the student over time is a gift
33. Happy to see my colleagues everyday
34. Staff being willing to reflect and be open to biases they have. Working towards removing biases and removing barriers to students learning
35. Staffs willingness to address the hard work
36. Growth and change is hard and the willingness to stick with it
37. Creating more opportunities for students
38. Commodore Options/EHHS being embraced by the district and parents. Part of the solution and essential to the success of the other schools in the district
39. Appreciate Team Commodore
40. Zen garden
41. Connecting with students and the community
42. BISD community

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. I will send VCP template. District has 90 days to submit a Voluntary Compliance Plan (VCP). District to indicate who is responsible for each finding. Need to indicate month and year for corrective action to be done for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. I am here to assist throughout the process. Please email or call with questions.

Again, thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin*;
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex*;
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability*;
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability*;
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

Please note that federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Therefore, school district individuals may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

I will be preparing an official Letter of Finding. In the meantime, if you have questions, please give me a call or email me. I am happy to assist and help.

Thank you.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Mansfield School District

MOA Civil Rights Onsite Review Exit Meeting Notes

May 23, 2019 | 3-4 PM

Provided Superintendent Messenger, Shane Bird, Cameron Kamphaus, Jamey Jo Steele, Ric Bayless, Kim Pease, Luke Hall, Jody Flaget, Les Lamkin, Maire Goulet, Katie Peet, and Jessica Bowman with the following:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. ADA portable lab stations, ADA portable sinks, and website links
5. Protruding Objects, examples and measurements

The following information is not inclusive of everything observed, noted or measured that will be addressed in the Letter of Finding.

Facilities Accessibility | Mansfield

1. Eyewash Station in the AG Shop did not have an inspection tag and the drain was over by the rollup door.
2. Eyewash Station water spout head measured 37 3/8 inches from the floor ground in the Science classroom. Maximum height is 36 inches from the floor ground. Also, the inspection tag indicated 10/26/07 with no current entries.
3. Oxy welding shut off handle height measured 57 1/2 inches from the floor ground in the AG Shop. Reach range is 40-48 inches maximum.
4. Emergency shut off valve height measured 52 inches from the floor ground in the AG Shop. Reach range is 40-48 inches maximum.
5. Air hose height measured 75 inches from the floor ground in the AG Shop. Reach range is 40-48 inches maximum.
6. First Aid Kit latch height measured 64 1/2 inches from the floor ground in the AG classroom. Reach range is 40-48 inches maximum.
7. Fire Blanket latch height measured 63 inches from the floor ground in the Science classroom. Reach range is 40-48 inches maximum.
8. Identification signage on the outside of the two AG Shop restrooms indicate they are accessible. They are not. Remove the International Symbol for Accessibility and then provide directional signage to the accessible restrooms, or make the restrooms accessible.
9. Door pressure ranges measured 10-19 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
10. Seat to seat configuration measured 17 inches in width in the Art classroom, which does not allow for a clear path of travel of a minimum of 32 inches.
11. Fixed seating in History classroom.

12. There is no program access to the Weight Training Room and Music Room due to the 22 stairs.
13. There is no accessibility to the Stage. There are 5 steps to the Stage.
14. There are no designated accessible seating for individuals with disabilities in the Gym.
15. The tables in the Commons are not accessible. The bar measured 26 3/8 inches from the ground floor and the length measured 20 1/2 inches. Minimum knee clearance is 27 inches at the bottom with a top measurement of 34 inches.
16. AED measured 7 1/2 inches from the wall, dispenser next the Tray Return/Dishwasher counter measured 4 1/2 inches from the wall, and the Main Office counter measured 13 1/2 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
17. The drinking fountains by the Common's restrooms have spout heights that measured 40 inches and 42 3/8 inches from the floor ground, the Men's Locker Room spout height measured 43 1/2 inches. The maximum spout height is 36 inches from the floor ground.
18. Paper towel dispenser height measured 54 inches from the floor ground in the Weight Training Room, the paper towel dispenser height in the Men's Locker Room and Women's Locker Room measured 54 inches from the floor ground. Reach range is 40-48 inches maximum.
19. Soap/Shampoo/Body Wash Dispenser measured 55 1/4 inches in height from the floor ground. Reach range is 40-48 inches maximum.
20. Seat is missing in the Men's Locker Room shower area. Lack of maintenance.
21. Towel hooks in the Men's Locker Room and Women's Locker Room measured 70 inches from the floor ground. Reach range is 40-48 inches maximum.
22. Toilet seat cover in the Men's Restroom measured 58 1/2 inches to the center and in the Middle School Boy's and Girl's Restrooms measured 55 1/2 inches to the center. Reach range is 40-48 inches maximum.
23. Pipes are not insulated or wrapped in the Men's Restroom and the Women's Restroom.
24. There is no latch on the outside of the accessible stall in the Women's Restroom.
25. Counter height measured 36 1/2 inches from the floor ground in the Art classroom, 36 inches from the floor ground in the AG classroom, 36 3/4 inches from the floor ground in the GEAR UP classroom, 35 7/8 inches from the floor ground in the Library, 41 inches from the floor ground, outside counter, to the Main Office. The maximum height for accessibility is 34 inches from the floor ground.
26. There are gaps in the sidewalk that range from 1 3/4 inches to 5 inches across.
27. The path of travel and ground surface becomes inaccessible, due to dirt and gravel, to where the animals are housed in pens. The path of travel and ground surface needs to be stable, firm, and slip resistant.
28. Main Parking Lot has a total of 86 parking spaces. There are currently two designated accessible parking spaces. The minimum number of required accessible parking spaces is four, to include signage and access aisles.
29. Main Parking Lot accessible parking sign measured 19 inches to the bottom. The bottom of the accessible signage to be 60 inches minimum from the floor ground. There needs to be signage provided for each accessible parking space.

30. Back Parking Lot has a total of 66 parking spaces. There is currently one designated accessible parking space. The minimum number of required accessible parking spaces is three, to include signage and access aisles.
31. Back Parking Lot accessible parking space has no accessible signage. Provide accessible signage directly in front of the accessible parking space and is a minimum of 60 inches from the floor ground.

Student Focus Group at Mansfield

Comments:

1. School is welcoming
2. School is safe and comfortable
3. Teachers are nice
4. Teachers are good
5. Feels like family
6. Teachers are helpful
7. Teachers tell you the truth
8. Life conversations with teachers
9. Harvest Carnival controversy and how people were treated
10. Don't have a lot of choices—get put into where they place you
11. It is cold in the building
12. Student stood up to other students who were bullying, laughing at, and calling a student with autism names
13. There are jokes shared about autism and the para and teacher don't say anything to stop it
14. The teacher will roll their eyes going down the hall with the student with autism
15. Removed and banned backpacks from the classroom. Work hard to get work done and want to use time wisely
16. Some teachers treat us like little kids
17. Teachers will brush off problems and not take what happened seriously
18. Students are sent to the office and administration sends them back to the classroom like nothing happened
19. Not grading papers or tests in a time manner. This impacts the ability to play sports
20. Lots of sitting around in the Leadership Class
21. Leader in Me program started 3 to 4 years ago. More useful in elementary than high school. Administration acts like they are still doing it, but it has been dropped
22. Leadership Class is mandatory if you are in ASB. Next year will be Zero Hour Class option
23. A particular subject matter teacher yells at students because the students do not understand the concepts the first time around
24. Enjoy clubs—Debate, WE Day, Mario Kart, DND, chess (in the past). Administration is open to students starting new clubs
25. Sports are combined with Waterville. Football, volleyball, baseball, softball, track, cheerleading, wrestling (boys only). High school participants go to Waterville and Junior High participants come to Mansfield

Things they would like to see changed:

1. Teachers to obtain additional education
2. Provide additional training to work with students with disabilities
3. Teachers to treat students with respect
4. Would like to have the option to have backpack in the classroom due to the fact the students work hard to get assignments done in class and they would also like the opportunity to work on other subject assignments
5. Teachers to take what happens in the classroom seriously with the students and be proactive and engaging
6. Leadership class to be organized, relevant, interactive, challenging and meaningful
7. Grading papers in a timely manner
8. Options for more electives at school
9. Consistency with heat and cold in the building
10. Music, Choir and Weight Training rooms available on the first floor and accessible to all students

Things they are most proud of:

1. Family and community
2. Teachers are pretty good
3. Teachers encourage you
4. Teachers will make time for you
5. Some teachers give good advice and are there to help you
6. Teachers give you opportunities to succeed

Mansfield School District Staff Interviewee Comments

1. Encourage every kid. We don't just talk about college. Trade school, apprenticeship, and military. Job Corps is gaining popularity
2. Encourage the kids to apply for more things. Help them find scholarships
3. Have had 5 superintendents in 17 years. Each one bring ideas and PD areas of focus
4. Always looking for ways to improve and change
5. Have PD access through webinars. Use of Safe Schools website
6. Last year updated all the policies. This year going through the procedures. Use WASDA.
7. Meeting with safety committee before the end of the year and build a plan to prepare for next year
8. Two teachers have received ACES training. It has been discussed to have the teachers share and provide what they learned with others
9. APEX Spanish, online
10. Moving to 7 periods. Intentional with intervention. Maybe summer school or APEX. Specific math and reading, ELA intervention class
11. Junior High Exploratory—Basic Intro to Woods, Outdoor Lawn Maintenance, Intro to Metals or Irrigation
12. An individual in Brewster does translation services. He reviews letters and will Skype during conferences to translate
13. Not a lot of advertising of promotion in the CTE area. We are an AG community and everyone knows it. It is an area for improvement

14. School Board doesn't have the time to work together on policies or procedures due to farming commitments
15. Share elementary and high school staff—Counselor, PE, Art
16. Build high school schedule off the needs of the Seniors—core classes and then work on the electives
17. The GEAR UP Coordinator is able to provide lots of resources and PD training for staff, e.g. Financial Aid training
18. Scholarship Night, and FAFSA and College Night include food to bring the parents and community together
19. Have itinerant SPED staff
20. Transgender and equal access is something that needs to be addressed
21. Have autistic student who started off partial day and now up to 5 hours a day. She tends to be violent. She will fall on the floor. Staff don't do anything when she is in a state of escalation. Wait patiently
22. Have an hour a day where a parent provides occupational therapy, stretches, for student and provides 30 minutes lunch coverage
23. Able to embed some training on early release day
24. Adding supports for next year. Offering Applied Behavior Analysis (ABA) support from ESD, in which each ABA program meets the needs of the individual learner
25. There is a para in preschool, and in 1-2 grade. All elementary have paras, because they help teach dual grades. Making changes according to need vs. tradition
26. Working towards making sure that paras have the necessary training they need in order to work appropriately with students
27. We try to do what is best for kids
28. Teachers have a lot of flexibility
29. Getting business teacher recertified
30. The GEAR UP program provides resources to students and enables the students to go on field trips to college campuses, and PD trainings are offered to staff.
31. AG classes. 18 paid members in FFA. Over half are active. District and State competitions. One student at State
32. Linked up with Wenatchee Valley College (WVC) with Tech Prep. If students pass with a B, students receive credit at WVC
33. More career exploration and career awareness activities: Personal Finance Class. Students are required to do an 8-hour job shadow
34. Don't have a classroom to teach math, leadership, yearbook, and health. Must go into the library to teach students. It is very crowded
35. The Stage is not accessible. No platform lift
36. There is no Career Center or Counseling Office
37. There is not an equitable system for classroom assignments
38. Teachers and staff would like to receive Implicit Bias or Unconscious Bias training
39. Curriculum in secondary education is outdated
40. Teachers do not have enough books
41. Do not have a curriculum renewal process. Need to create one
42. Teachers have purchased books
43. There is a lack of communication from administration to staff

Things they would like to see changed:

1. The ability to teach more students
2. Allow us to have more resources
3. Have Special Education restrooms
4. Would like to have a true intervention class
5. Communication
6. A slightly bigger classroom
7. A lab separate from the classroom
8. A program where can monitor chrome books from teacher's computer
9. Get funded for 12.6 teachers. We need another JH/HS teacher
10. Running Start online program through CWU for elective credits only
11. Running Start students are on the road a total of three hours
12. Would like to be able to teach 7th and 8th grades separately
13. Budget equitableness across instructional content areas
14. School Board to have a Strategic Plan in place
15. Collaboration time
16. More time with other teachers in various districts
17. Additional collegial time
18. More staff events. This helps with interpersonal relationships
19. More transparency and more communication
20. Appropriate PD for staff
21. Like to see teachers know what great instruction looks like
22. Increased mental health services to be brought into the schools
23. Language and mindsets for students with disabilities
24. Collaboration: Going from more restrictive environment to least restrictive environment
25. Increased accountability for teachers about keeping their online gradebook up to date
26. Advocacy for our LGBTQ kids
27. More cultural awareness for teachers and students

Greatest challenges:

1. Student home life
2. Lack of exposure to life. The use of YouTube
3. Very sheltered lifestyle
4. Most kids come us with 4-5 ACES
5. Lots of single families in low income housing
6. Students not ready to go anywhere outside of Mansfield. Not prepared
7. The size of the school
8. Not a lot of variety
9. Collaboration time
10. One departments—English, Math, History, Science
11. We don't have the teacher resources to offer classes for students with pathways to fulfill the classes students want
12. It is difficult to give students at the higher end of the spectrum, rigor, what they need
13. The ability to network with other content area teachers and professors
14. Providing necessary training to teachers and staff
15. Relevant and meaningful PD

16. Opportunities for kids. Offer some college in the classroom for kids
17. Running Start student transportation
18. Accessibility for students in a wheelchair
19. Communication between administration and staff
20. Top down is a challenge districtwide
21. Timely manner when submitting a PO and when the PO disappears, then it is No for reimbursement
22. It is not worth putting in a PO if it takes 2 months to be reimbursed
23. Frustrations. Expectations with the amount of time spent, off contract time, to do things for the kids. Shouldn't be made to feel guilty
24. EL students speak English at school and then return to home to speak Spanish. It is a matter of spending more time practicing and speaking English.
25. Interpreters are available during counseling sessions and especially when dealing with discipline issues
26. Local vs. those who commute. Classified vs. certified
27. Who is responsible for what? Very foggy
28. Social media and cell phones

Things they are most proud of:

1. It is like family here
2. Openness of support from everyone
3. Staff and kids!
4. We do more than just teach. Personally involved with each student
5. Students know they can ask questions beyond specific content area
6. The way you know those that have a need is to know they have a need
7. We work hard at trying to sustain and build an environment that is productive
8. Great place to make a difference!
9. Goal is to leave the place better than when we got here
10. The majority of students that graduate out here still seek advice and keep in communication
11. State testing in Science is higher than state average
12. Large FFA chapter
13. Dual enrollment
14. We find a way to help with students and families with food, clothing, and a place to stay
15. Creativity is Intelligence Having Fun! ~Albert Einstein
16. Teach work ethic. I just do it in the Art classroom
17. Work with care and coaching
18. The family atmosphere

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. I will send VCP template. District has 90 days to submit a Voluntary Compliance Plan (VCP). District to indicate who is responsible for each finding. Need to indicate month and year for corrective action to be done for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for

corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.

3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. I am here to assist throughout the process. Please email or call with questions.

Again, thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability;*
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Therefore, school district individuals may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

I will be preparing an official Letter of Finding. In the meantime, if you have questions, please give me a call or email me.

Thank you.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

MOA Exit Reports 2019-2020

The following subrecipients received an MOA Civil Rights onsite review and MOA Exit Report during 2019-2020.

- Orting School District
- Chehalis School District

Orting School District

MOA Civil Rights Onsite Review Exit Meeting Report

February 20, 2020 | 4-5 PM

Attendance: Superintendent Marci Shephard, Debi Christensen, Chris Willis, Cliff Fries, Matt Carlson, David Slagel, Kevin Collins, Curtis Nybo, and Deifi Stolz.

I agreed to send the following resources to the team:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. 1991 ADA Standards
5. ADA portable lab stations, ADA portable sinks, and website links
6. Protruding Objects: U.S. Access Board; district examples of meeting compliance
7. WA Models for the Evaluation of Bias Content in Instructional Materials
8. Compliance Coordinators Resources

The following information is not inclusive of everything observed, noted or measured that will be addressed in the Letter of Finding. However, it provides the opportunity to get started on items requiring attention.

Administrative

1. Orting School District did not publish, post, or disseminate the Annual Notification prior to school beginning in English or Spanish. It is important to place the Annual Notification on the district's homepage and on the high school and middle school homepages.

Facilities Accessibility | Orting High School

1. Main Parking Lot accessible parking signage measured 45 3/8 and 47 1/2 inches to the bottom. The bottom of the accessible signage needs to be 60 inches minimum from the floor ground.
2. Main Parking Lot van accessible parking space measured 93 inches. The minimum van accessible parking width is 132 inches. The accessible parking space measured 95 1/2 inches. The minimum required accessible parking space width is 96 inches.
3. Student Parking Lot accessible parking signage measured 46 1/4 and 47 inches to the bottom. The bottom of the accessible signage needs to be 60 inches minimum from the floor ground.
4. Student Parking Lot van accessible parking space measured 94 1/2 inches. The minimum van accessible parking space width is 132 inches. The accessible parking space measured 92 1/2 inches. The minimum required accessible parking space width is 96 inches.
5. There are a total of 204 parking spaces. The required number of accessible parking spaces is seven and there are six. Add another accessible parking space, access aisle, and accessible signage in the Main Parking Lot

6. Counseling and Staff Parking Lot accessible parking signage measured 38 ½ and 40 ¼ inches to the bottom. The bottom of the accessible signage needs to be 60 inches minimum from the floor ground.
7. Ramp outside Portable 1 has slope incline measurements of 8.2 percent at the bottom to 9 percent at the top. The maximum allowable slope incline is 8.33 percent.
8. Ramp outside of Portable 5 has slope incline measurements of 6 percent at the bottom to 9 percent at the top. The maximum allowable slope incline is 8.33 percent.
9. Ramp outside of Portable 4 has slope incline measurements of 7.5 to 9.3 percent. The maximum allowable slope incline is 8.33 percent.
10. Ramp outside by Stadium, Steps and ASL has slope incline measurement ranges of 11.2 to 12.2 percent. The maximum allowable slope incline is 8.33 percent.
11. The path of travel is not accessible to the garden space or shed. It transitions from black top, to grass along an uneven surface. The other path built from the Horticulture portable is black top then transitions down a 45-degree angle that is unstable and unsafe.
12. Greenhouse path of travel is black top and transitions to gravel to the door. The path of travel and accessible route needs to be stable, firm, and slip-resistant.
13. Portable 6 has tables that measured 23 inches at the bottom and 36 inches at the top. A minimum requirement of 27 inches from the ground to the bottom of the table for knee clearance.
14. Various rooms had aisle width configurations of 18 to 32 inches. A minimum of 32 inches in width is required.
15. ASL Room/The Nest has door pressure of 9 pounds and the Exit door pressure of 12 pounds of pressure. The maximum allowable pressure is 5 pounds.
16. ASL Room/The Nest does not have any room signage. Provide tactile and braille signage. Also, need ADA directional signage to the accessible ramp.
17. Rooms 204 and 206 have no permanent ventilation. There are two fans in the windows blowing air out and two fans in the windows drawing air in.
18. Emergency Shower handle height measured 65 ¼ inches in Room 204. Emergency Shower handle height measured 68 inches in Room 206. The maximum reach range height is 48 inches.
19. Eyewash station water head height measured 42 inches in Room 204. The maximum reach range height is 48 inches.
20. Eyewash station water head height measured 43 inches in Room 206. The maximum reach range height is 48 inches.
21. Paper towel dispenser heights throughout the building measured 48 to 54 inches. Reach range is from 40-48 inches maximum.
22. Soap dispensers heights ranged from 46 to 61 inches throughout the building. Reach range is 40-48 inches maximum.
23. Water pipes in several of the restrooms are not wrapped or insulated. It is important to have at least one accessible sink that has insulated pipes so that individuals who have no leg sensation will not burn or hurt themselves on sharp edges.
24. Mirror heights measured 40-42 inches from the floor to the bottom of the mirror. The requirement for mirror height is 40 inches from the ground to the bottom of the mirror, unless angled.

25. Fire extinguisher handle height measured 74 ½ inches in Room 204. The maximum reach range height is 48 inches.
26. Fire extinguisher handle height measured 71 ¾ inches in Room 206. The maximum reach range height is 48 inches.
27. The Bird Feeder, Student Store, has counter heights of 36 inches. The display cabinet counter height measured 42 inches. No forward approach.
28. The Bird Feeder, Student Store, three sink area measured 24 inches at the bottom and 36 ½ inches at the top. No forward approach.
29. The Bird Feeder, Student Store, shelving slot wall first shelf of three measured 64 inches in height. Reach range is 40-48 inches maximum
30. Door pressure throughout the building measured 5-30 pounds of pressure. The maximum allowable pressure is 5 pounds.
31. Culinary Rooms 103 and 105 have counter heights measuring 36 ½ inches. No forward approach. The maximum height for accessibility is 34 inches from the floor ground.
32. Culinary Room eight stainless preparation tables measured 12 ½ inches at the bottom and 36 1/8 inches at the top. One stainless preparation table measured 34 ½ at the bottom and 36 inches at the top. The maximum height for accessibility is 34 inches from the floor ground.
33. Drinking fountains throughout the building had a distance of 10-13 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
34. Drinking fountains throughout the building had handle pressures of 5 to 8 pounds of pressure. Maximum allowable pressure is 5 pounds.
35. Drinking fountains throughout the building had stream heights of 2 to 8 inches. Minimum required stream height is 4 inches.
36. Elevator photo eyes need to be checked. When the elevator door begins to close, it is not consistent in opening back up when interrupted with an arm or leg crossing the photo eyes.
37. Elevator key is difficult to turn. Individual in a wheelchair is not able to turn the key.
38. Elevator certification expiration date in the elevator indicated 3/1/2020. Make certain the elevator certification is current in the elevator.
39. Room 100, Art, has wooden tables with 24 ½ inch bar height and 30 ½ inches at the top. A minimum requirement of 27 inches from the ground to the bottom of the table for knee clearance.
40. The conference table in Cliff Fries room measured 25 inches at the bottom and 30 inches at the top. A minimum requirement of 27 inches from the ground to the bottom of the table for knee clearance.
41. Counseling Office counter height measured 42 ½ inches.
42. Room 108, STEM, has a 5 ½ curb height to Environmental Science area.
43. Room 108 has yellow striping tape that is lifting up due to heavy use. Need to maintain.
44. Room 108 has and eyewash station that has no inspection tag. No indication of when it was last tested.
45. Room 108 First aid kit handle latch measured 52 inches. Reach range is 40-48 inches maximum.
46. Room 203 has tables that measure 23 ¾ inches at the bottom and 29 inches at the top. A minimum requirement of 27 inches from the ground to the bottom of the table for knee clearance.

47. Room 209 has tables that measure 26 ½ inches at the bottom and 27 ½ inches at the top. Computer tables measure 26 ½ inches at the bottom and 28 ½ inches at the top. A minimum requirement of 27 inches from the ground to the bottom of the table for knee clearance.
48. Room 209 has a clearance of 22 ½ inches from the door to the file cabinet. A minimum width of 32 inches is required.
49. Coat hook heights throughout the building measured 52 to 73 inches. Reach range is 40-48 inches maximum.
50. West Wing Boys Restroom is not accessible and yet the signage indicates it is. Need to remove the accessible symbol or replace the signage. Option to make the restroom accessible.
51. West Wing has just one Staff Restroom and it is not ADA complaint. There is no signage. The door pressure measured 26 pounds. There are no grab bars. Soap dispenser height measured 51 inches. Mirror height measured 45 inches.
52. Second Floor Women's and Men's Restroom door pressure measured 30 pounds of pressure.
53. Identification signage on the outside of several rooms have missing letters or numbers.

Facilities Accessibility | Orting Middle School

1. Main Parking Lot accessible parking signage measured 39 ½ and 40 ¼ inches to the bottom. The bottom of the accessible signage needs to be 60 inches minimum from the floor ground.
2. Stadium Parking Lot accessible parking signage measured 33 ¼ to 40 ¼ inches to the bottom. The bottom of the accessible signage needs to be 60 inches minimum from the floor ground.
3. Gym Parking Lot accessible parking signage measured 39 ½ inches.
4. Door pressure ranges measured 9-14 pounds of pressure throughout the building. The maximum allowable pressure is 5 pounds.
5. AED next to the Gym is considered a protruding object. Items measuring 4 inches from the wall are considered protruding objects.
6. Girls and Boys Restroom, next to Room 303, mirrors measured 44 inches and 45 inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
7. Staff Restroom, 100 Wing, mirror measured 40 ¼ inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
8. Girls and Boys Restroom, across from Room 105, mirrors measured 49 ¼ inches and 48 ¼ inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
9. Eyewash station is not working in Room 108.
10. Various signage heights 58-61 to the center of the sign throughout the building.
11. Boys Locker Room mirror measured 40 ¼ inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
12. Boys Restroom in the Gym mirror measured 41 ¾ inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.

13. The sink heights in the accessible restrooms measured consistently at 34 ½ inches from the ground. Sinks shall be installed with the front of the rim or counter at 34 inches maximum from the ground.
14. Commons bleachers do not have wheelchair-seating areas with companion seating.
15. Commons stage has a set of 5 stairs on each side. The path of travel to the provide an accessible route to the stage is 138 feet. Individuals with physical mobility challenges often need to take a break every 20 feet.
16. Drinking fountains across from Room 306 are protruding objects. Both the low and high drinking fountains measured 18 inches from the wall. Items measuring 4 inches from the wall are considered protruding objects.
17. Girls Restroom, next to Room 103, mirror measured 49 ¼ inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
18. Boys Restroom, across from Room 105, mirror measured 48 ½ inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
19. Boys Restroom, next to Room 303, mirror measured 45 inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
20. Girls Restroom, next to Room 303, mirror measured 44 inches from the ground floor. The maximum height from the ground floor is 40 inches to the bottom of the mirror.
21. Student Support Center has a counter height of 46 inches. There is no forward approach. The maximum height for accessibility is 34 inches from the floor ground.

The following information are excerpts of what students, teachers, and staff shared from the interviews conducted. It provides an opportunity for reflection, discussion, and action.

Student Focus Group at Orting High School

Comments:

1. It is easy to get to know everyone
2. I like it here
3. It is inclusive
4. It is east to make friends due to the amount of clubs
5. Teachers will help you if you are struggling
6. It is welcoming here
7. Comfortable school
8. Teachers and staff pay attention
9. Feel respected
10. Feel safe
11. It is a welcoming school
12. Involvement opportunities in FBLA, FCCLA, Sports Med, ASB
13. Several of the students would like to go to the following: Central, Western, DigiPen, film school, Eastern, Oregon University

Things they like:

1. Before and after school help from teachers
2. Different variety of clubs and being able to join any of them

3. Kids are nice
4. Lunch protein pack
5. Sports teams being recognized for success
6. It doesn't matter how a team is doing, people come to support and watch
7. The school
8. Even the popular kids are nice, funny, cool, chill, and have good vibes
9. It is easy to start a club
10. Advisors a good at welcoming kids into clubs
11. Lots of teachers are flexible
12. Students being involved in school.
13. More leadership opportunities.

Things they would like to see changed:

1. Teachers to be recognized more!
2. Since the clubs have an impact on the school, it would be nice to have a way for the clubs to connect for greater impact
3. More language classes: French, Mandarin, German
4. Have a pool added to the school
5. Have a bowling team
6. Men's volleyball
7. Football 707 team
8. Snowboarding club
9. Have vending machines with Gatorade options
10. Tables to sit outside for lunch
11. Teachers being overworked
12. AP Statistics, AP World History. Not able to have AP classes due to low enrollment and have to go outside the high school for math class.
13. Hand dryers
14. Sports Med 2 own class. At this point, a lot of individual reading. Similar with ASL.
15. Would like to have Sports Med 3 class
16. Arts and Drama programs to have additional funding
17. Lunches: Would like more protein. At times, expired milk.
18. Own student store. Just purchased by FBLA
19. All ASB and clubs transitioned this year. ASB are mostly Seniors now. Need class advisors.
20. By 7:35 a.m. there are no parking spaces left, even though have purchased a parking pass. It is okay to park at Safeway.
21. There is a divide between First Period Leadership Class and Fourth Period Leadership Class. One class is learning how to run a business. The other class has a room full of kids who don't know what to do. They want to be able to learn, apply and serve at school.
22. Communication and scheduling sports. Clubs have to work around the sports schedule.
23. Campus is very spread out
24. Would like to have an Open Campus for lunch. Try it out with Seniors.
25. Teachers who park in the Student Parking

Student Focus Group at Orting Middle School

Comments:

1. School is a safe environment
2. Welcoming
3. It's alright
4. Don't like talking about it
5. Feels normal, nice, safe, inviting
6. Welcoming place
7. There is a girl who stand by the door, smiling, and giving high-fives
8. Some people can be rude, especially in the hallways.
9. Sometimes I don't want to come to school.
10. Everything is fine.
11. Custodians are really nice.
12. Writing on bathroom stalls is clean up quickly
13. Nothing positive or negative. One more day. I can do it.
14. Sometimes I don't feel like being around people.
15. Pretty safe
16. Excited to see my friends, depending on the day
17. Lots of clubs
18. Several sports
19. Students are interested in the following careers: cyber security, veterinarian, music, chemistry, construction engineer, inventor, aeronautical engineer

Things they like:

1. Teachers are nice
2. The school
3. People are nice, even the teachers
4. Lots of choices for electives, sports, clubs
5. Custodians and how they clean the school
6. Flying drones is so much fun!
7. Battle of the Books
8. Good friends
9. Teachers standing outside the doors
10. Office staff are super nice! They should get a raise!

Things they would like to see changed:

1. They way some people act.
2. Hallways are too crowded and people run into you.
3. Gums stuck to the walls
4. Food is not very good. Found a hair in my nachos and now bring lunch from home.
5. Expand the school. Build a new Wing.
6. Need more teachers
7. Lunch room is very crowded
8. In the gym where assemblies are held, many students have to sit on the floor
9. Make the school bigger. Overcrowded.

10. Classroom setting. Less talking to friends and more about classes.
11. Falcon Time set up. (Need to get signatures in advance. Need to go before or after school to obtain signatures. At times, there is only five minutes to obtain signatures. Long lines and sometimes it doesn't happen. Can be annoying at times. Physically can't fit into the room due to the amount of students.)
12. Change the math curriculum
13. Would like to learn how to do taxes
14. Not much school pride outside of Spirit week (50 percent participation and sometimes forced) or Pep assemblies.
15. The In and Out system is difficult
16. Passing time is too short
17. Carpets in some areas are a tripping hazard
18. Walking into the Main Entrance get pushed to the wall
19. Hard to navigate the passing period in the hallways. Some people just stand there and block the hallway. Need to push through at juncture points. Don't like it.
20. Students don't all fit in the gym. We are like a pack of sardines.

Orting School District Staff Interviewee Comments

1. All students ready for college, careers, and life.
2. What is measurable? What is college ready? What is career ready? What is life ready? Graduation rates climbing, rigorous diploma, and staff know each student by name.
3. Working with the community and redefining "ready"
4. Attendance is critical along with soft skills.
5. Growth mindset, kindness, respect, forgiveness.
6. CTE pathways is a shift for staff. Some of the teachers are afraid of the process.
7. Trying to "push in" more into communities due to lack of public transportation.
8. Bringing community to students and students to the community. Areas of poverty.
9. CTE provides opportunities with internships. Working with business leaders, maximizing what we have in Orting, and writing relevant frameworks.
10. Pushing for 100 percent dual credit opportunities. Next year 90 percent
11. All of the elective are CTE. Moving towards pathways.
12. CTSOs: TSA, FCLA, FBLA, FFA
13. Two credits have hurt us a bit. Looking a Master Schedule to accommodate. College in the High School for math and science students.
14. Running Start at Pierce College.
15. Failed levy has impacted the climate and morale is employees
16. Letters are translated, i.e., Rights and Responsibilities, immunizations, etc. Use Dynamic Language.
17. EL instructor works with the counselors, students, families. Meets to discuss issues.
18. Use of iPads, Google translate, and visuals with EL students.
19. Use of interpreters at conferences and IEP meetings.
20. EL parents receive guidance at the front desk. Paperwork is hard. Use of resources.
21. Use of Language Line a couple times a month.
22. Use Dynamic Assessment and Read-Aloud strategies for EL students.
23. Need to keep asking ourselves how we can communicate with others besides Spanish. Documents are available in several languages.

24. Revamped the entire website that is now ADA compliant and accessible.
25. Deaf parent. Have to arrange at least two week in advance for services. The counselor works with the household members.
26. Skills Ink program is very beneficial for our kids.
27. Have all students take the PSAT and SAT. An autistic student qualified for the national scholarship.
28. Life skills classroom in a portable by the trash can. Would like to move to the core of the main building. Have more access to students.
29. No barriers to education in AP.
30. Recruitment Team is balanced by gender and grade levels. Not a lot of ethnic diversity.
31. Recruiting teachers of color.
32. Rubric developed to evaluate job applicants.
33. Strong foundation in place that is fair and equitable.
34. Clear guidelines for dispute resolution.
35. Evacuation plan to fire lane.
36. Safe Schools module has a small section on Title IX.
37. Need more purposeful Title IX training.
38. All Title IX Coordinators will be trained. Have the materials.
39. ESAs form will be revised.
40. Probationary evaluations are prepopulated by HR with reminders on calendar invites.
41. Math for all, regardless of disability and income. Teaching and Learning provides equitable access.
42. Looking at science and materials.
43. Where equity lives and why it matters
44. HIB investigations done occasionally
45. Character Strong training
46. Turnover in leadership
47. Kids are more than a score
48. Making sure locally designed assessment that is aligned to rigor and content. Go back to standards and move forward. Use assessment as a guiding tool, not as a hammer.
49. Constituents are more data savvy. Use of trend data.
50. Each year the requirements for CTE programs change. Try to offer as much information as possible. Depends on the staff and skills of what can offer.
51. Students use Career Cruising to help determine their career interests and for the High School and Beyond Plan
52. Counselors sometimes cover for teachers and observe students.
53. 8th grade students able to attend Pierce County Skills Center, PLU, Highline College for STEM, 25 girls. Women in the Trades.
54. Clover Park Technical College (all grades and subject levels)
55. Apprenticeships at the WA State Fair.
56. Have signing day for everyone (military, work, apprenticeships, schools, etc.)
57. College and Career Day is done prior to registration.
58. Tying registration to what is your A Plan and what is your B Plan?
59. SPED teachers work well with students with IEPs. There are paras in Robotics.
60. IEPs focused on postsecondary and transition plans.
61. Work with a student who is blind and uses braille.

62. There is a student who has a cochlear implant and make accommodations.
63. The Seesaw student-driven digital portfolio that is a powerful learning loop between students, teachers and families. Students use built-in annotation tools to capture what they know.
64. Computer Science has a decline with female enrollment due to them being pulled to be TA's. Male students also submitted for the TA selection process and were not selected. Computer Science is an elective that is an actual requirement. These students will not have another chance to take.
65. Projects are based on rubrics. Peer pairing.
66. Code.org training has a strong emphasis on diversity. It has an equity lens at its core. The more diversity, the stronger the program.
67. Photographers from the area are brought into the classroom.
68. Police officer from Seattle Police Department came and spoke about Internet Safety and Social Media.
69. Show videos during web development.
70. CTE Showcase month is in February where students display their work.
71. Environmental Science had a curriculum full review by staff, parents, students, and community. Spanish materials available.
72. Economics books are available in audio as well as Spanish.
73. Code.org materials available in Spanish.
74. ASL frameworks written and updated. Make up own curriculum. Inclusive of gender and race. Not as many students with disabilities.
75. STEM frameworks written. Make up own curriculum. Purposefully feature diversity.
76. Math materials in braille.
77. Guest speaker come into CTE classrooms and field trips taken for career awareness.
78. CTE classes are promoted through word of mouth, brochures, posters, tables at lunch, Special Ed, CTSOs, counselors, from the CTE teachers, 8th grade orientation, registration, Open House, etc.
79. Cultural Night is well attended. Different food from different cultures. Food truck.
80. Making connections with the advisory committee is important.
81. Brining in additional equipment.
82. Test class of using tables as whiteboards. Have 33 students for each class. Some students are sitting on the side of the room.
83. Sports Med Competition. Bring people in from Amazon and Boeing, past athletes. Seahawks came to the school!
84. Have the option for field trips. The process to go on field trip is arduous.
85. PT done with each military branch.
86. Partner with Anytime Fitness for students physical fitness needs.
87. Pacific Islander, foster care students, and McKinney Vento students are struggling.
88. Many kids go to the community college and don't finish.

Things they would like to see changed:

1. Better communication
2. Access to mental health services, employment, and transportation
3. No public transportation is a huge equity issue
4. Would like to have an Activity Bus.

5. A lot more 6th grade sports, i.e., track, baseball, wrestling, volleyball, soccer. Students who are engaged in clubs and sports are more likely to have educational success.
6. Students in Prairie Ridge are not able to come to after school activities.
7. Staffing model to address daily concerns.
8. Need professional development
9. Provide better tools and resources but not at the expense of pulling teachers out of the classrooms.
10. Not able to afford to take teachers out of the classrooms more than we already do.
11. Experiences for students
12. Middle school math. Professional development training, visiting the math classrooms, and learning together. Digging in for better outcomes.
13. Setting up students for success.
14. A more centralized high school.
15. Smaller caseload (at 400 students) in order to provide more personalized services.
16. The number of students failing. They haven't been held accountable and don't understand the value of education.
17. Bigger budget to grow interventions.
18. Expanded use of Video Relay Services (VRS) for ASL students.
19. Provide foreign language earlier to students.
20. Drug and alcohol groups in previous year had made progress. Marijuana is now legal and many students are addicted even at the middle school level.
21. Bigger budget to grow CTE programs in all of the 16 clusters.
22. The garden space is not accessible. Tried to build a path down below. It is a 45 degree angle. Have to walk all the way around.
23. Need Sports Medicine books. Additions are behind.
24. Bigger classrooms. Have up to 32 students in a portable with nine treatment tables. Not accessible pathways or aisles.
25. There are many curbs. A student in a wheelchair is not able to get around a corner to the portables. There was an attempt to add more blacktop, but the angle is too steep.
26. All the buttons for the doors need to be worked on.
27. Elevator is a problem. A student is not able to turn the key to make the elevator work.
28. Updated culinary kitchen. There are no vents in the rooms. Need HVAC system.
29. Dryer vent goes into the hallway.
30. Sinks are too high in the Photography and Art classroom.
31. Converted the old gym to a weight room. The floor isn't good. Need modern equipment. Treadmills. Don't have computers to access websites or to amazing apps for health and fitness.
32. Button outside of gym doesn't work.
33. Curriculum adoption process with an equity emphasis. There is a gap and it is important.
34. Professional development offered on Implicit and Unconscious Bias training.
35. Conversation around equity to be more centralized. Learning what does it look like and doesn't look like at the leadership level.
36. Not lowering the bar. Looking at the data and sharing it with staff. What would it take for us to get there?
37. Students in wheelchairs or those with mobility challenges being able to get into the West Wing and also open the ASL classroom door.

38. Intentions are not reality
39. Over class limits. The goal is 140, at 158 students.
40. Not interested in buying out planning period. No.
41. Student enrollment count: a. over 32 students in one class or b. over 140 students per day have two options. One: place a para in the classroom. Two: Paid \$3 per kid per day.
42. Smaller class size. Could go into more depth.
43. Size of the classroom. Don't have the physical space to do what needs to be done with robotics and drones.
44. Size of the classroom, 3-D printers.
45. Perception that we are a hick town, all white, backwater, farming community.
46. Wish to have more diverse staff
47. Building culture from the ground up with 7th and 8th graders
48. Teaching respect and employability skills.
49. Get rid of the Orting Citizens Blotter
50. New facilities
51. Access to more technology
52. Gym: It is a museum to wrestling
53. The Elementary School in the middle of the high school campus.
54. A redesigned high school.
55. Bringing the labs up to code. There is no ventilation system. Use of \$15 fans from Walmart.
56. Technology. It is difficult to keep up.
57. The ability to transform the school to a digital mindset.
58. Fabrication lab is very small with lots of equipment. Glad to have it. Wish it were bigger.

Greatest challenges:

1. Communication in general. Why a student is now in the class or taken out?
2. Parents perceptions of classes.
3. Keeping good people. There is an 11 percent turnover. Hard to recruit and getting people to live here.
4. Taking care of the people so that in turn the kids can learn.
5. The expanse of the campus is difficult for students with mobility issues.
6. Cultivating a sense of purpose and empathy.
7. Getting students to think outside of themselves and see the relevancy of what they are learning and doing.
8. Behavioral issues that are multifaceted. One student impacts the entire classroom.
9. K-2 behavioral issues. Not transitioning well. Have had to clear rooms.
10. In fighting with adults.
11. Mindset is the big issue. Building momentum and growing.
12. Equity and opportunities for students. It is a new conversation.
13. Sequencing of pathways in an authentic manner. Robust and diverse.
14. Mental health needs.
15. Attendance
16. There are a lot of broken homes. Home issues.
17. Varying levels of expectations at home.

18. Generational poverty.
19. Getting access to mental health services. Wrap around services.
20. Great services that have been brought into the building. However, it is not enough to meet the needs of the students and parents.
21. Some students are pulled out of class to take care of siblings while the parents work.
22. Reaching the kid who doesn't care. How to motivate the students who don't know where they are going to get dinner. How to motivate the unmotivated?
23. Preparing the students for the rigors of high school and beyond.
24. Substance abuse and self-care
25. Behavior and course grades (interventions)
26. Food and clothes.
27. Behavioral and mental health of staff. Help with work/life balance.
28. Every staff member to feel appreciated, recognized, and honored as individuals.
29. Getting the kids to believe they can go out and can go to college or transition to employment.
30. Time and space. Lots to do and a limited amount of time to do. Triage.
31. Families and communities. Making progress.
32. Living in a conservative community
33. Diversity and having peers of which your share representation.
34. Helping the students to believe they can do something special.
35. Getting away from traditional teaching.
36. Getting past the small school, small town mentality.
37. Perception of having less options for students or that less is expected from them.
38. Lack of diversity.
39. Rigor. Some students don't want to work that hard.
40. Kids who want to graduate with a 4.0, don't want to take AP or hard classes.
41. Lack of having a PLC. No one else. Talk to the Spanish teachers. Have to find other colleagues in other locations/states.
42. Staff have to wear multiple hats, i.e., coach, club advisor, supervise after school activities.

Things they are most proud of:

1. Sense of family and community.
2. Great staff and the relationship with the kids.
3. Good programs.
4. How much staff care about students.
5. Staff are champions for students.
6. Continuing to remove barriers.
7. We know kids by name and need.
8. People are here early and late because they care.
9. People who work in Orting
10. Culture of learning and caring. Use the Character Strong curriculum.
11. Creating an inclusive environment. A bigger arc.
12. Care about the kids and try to give them the best experiences.
13. Changed what we do in the computer labs. Now have the students do coding and programming.

14. Tons of learning to do. We have totally changed how classes are taught in the last four years.
15. The ability to hire new teachers who have brought a great amount of energy to the school and are more inclusive.
16. Lots of clubs: D&D, ukulele, art, math, service, Knowledge Bowl, LGBTQ, Poke Man Go, chess, technology, creative writing, homework, video gaming, Cultural Unity. Select clubs: National Junior Honors Society, ASB, Year Book
17. The administrative team doesn't micromanage. Trust you as a professional.
18. Administration: Let's Summit the Mountain. It makes us feel like we can compete with other schools bigger than us!
19. The ability to research, look at new ideas, and stay up-to-date on what is happening in industry.
20. Academic freedom to give students opportunities and experiences.
21. We have really great kids!
22. Working on Cloud 9. Have a great mentor. It is easy and fun! Do a lot outside of the box with the students.
23. Like the people they work with and able to joke around with one another.
24. Teachers are colleagues and friends.
25. Small town community that is now a bedroom community. People have big hearts!
26. Supporting and taking care of the people we have.
27. Relationships with outside agencies. Multi-Care Behavioral Health, Morningside, Trillian, Recovery Café, clinical psychologist
28. Strong truancy board
29. People really do care
30. Everyone cares about kids! You feel it in Orting.
31. Banners in the hallway. They are symbols that we are in a transformation. High school has been turned upside down.
32. Lots of good people
33. Food truck. Research any culture and food.
34. Great teachers who care about kids
35. Character learning
36. Care closet.
37. Instructional rounds
38. Equity lens when looking at instructional frameworks.
39. Equity and student voice feedback for teachers.
40. Lots of parent turn out and support
41. Inclusive school environment
42. Students and teachers are nice to one another
43. Great coaches
44. No gangs.
45. No cliques with administration.
46. Staff want to help kids and are passionate about what they teach.
47. Teachers have each other's backs.
48. Small town, big view.
49. Town is here to help.
50. ASL Fundraiser Night

51. Girls' basketball kickoff is huge!
52. The Spirit of Orting! Win at Jostens every year.
53. STEM and Computer Science
54. People care, give, and invest. They are exceptional!
55. People do amazing work. They are rock stars!

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. I will send VCP template. District has 90 days to submit a Voluntary Compliance Plan (VCP). District to indicate who is responsible for each finding. Need to indicate month and year for corrective action to be done for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I request that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once the VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. I am here to assist throughout the process. Please email or call with questions.

Again, thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability;*
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Therefore, school district individuals may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

I will be preparing an official Letter of Finding. In the meantime, if you have questions, please do not hesitate to call or email me.

Thank you.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE
Olympia, WA 98501
360-725-6254
deifi.stolz@k12.wa.us

Chehalis School District

MOA Civil Rights Onsite Review Exit Meeting Notes

February 27, 2020 | 11-12 PM

Attendance: Heather Pinkerton, Bob Walters, Rick Goble, Debby Gregory, Jeff Johnson, Trisha Smith, Gladis Mendez, Derek McMillion, and Deifi Stolz.

I agreed to send the following resources to the team:

1. Laser Level and Door Pressure, pictures and website links
2. OSHA Eyewash Station Fact Sheet
3. 2010 ADA Standards
4. 1991 ADA Standards
5. ADA portable lab stations, ADA portable sinks, and website links
6. Protruding Objects: U.S. Access Board; district examples of meeting compliance
7. WA Models for the Evaluation of Bias Content in Instructional Materials
8. Compliance Coordinators Resources

The following information is not inclusive of everything observed, noted or measured that will be addressed in the Letter of Finding. However, it provides the opportunity to get started on items requiring attention.

Administrative

1. Chehalis School District did not publish, post, or disseminate the Annual Notification prior to school beginning in English or Spanish. It is important to place the Annual Notification on the district's homepage and on the high school and middle school homepages.

Admissions

1. Chehalis School District to provide steps taken to increase EL and students with disabilities participation in programs where they traditionally have been underrepresented. Evidence to Include: documentation of counseling services, counseling materials, placement and follow-up data.

Guidance and Counseling

1. Chehalis School District to provide 2019-20 enrollment demographics by CTE class/program.
2. Chehalis School District to provide description of any efforts made to correct disproportionate program enrollment by gender, minority or students with disability status.
3. Chehalis School District to provide examples of revised counseling materials or activities in response to disproportionate enrollments.

Comparable Facilities

1. Chehalis School District to provide a comparison of programs and services offered to both students with disabilities and students without disabilities.
2. Chehalis School District to provide facilities comparison of locker rooms, changing rooms, showers, restrooms, coaches' rooms, and classrooms offered to both students with disabilities and students without disabilities for students of the other sex.
3. Chehalis School District to provide facilities maps marked to indicate access points to locker rooms, changing areas, showers, restrooms, and classrooms.

Employment

1. Chehalis School District to provide screen shots of the ESD online application.
2. Chehalis School District to resubmit the two job descriptions: Assistant Boys Basketball Coach and Paraeducators-Special Education. The job description files have hashtag naming conventions that do not allow the files to be opened.

Facilities Accessibility| W.F. West High School

1. Welding stations in the AG Shop have a 21 ¾ inch width clearance. The minimum clear door width requirement is 32 inches.
2. Safety goggles are so scratched students are unable able to see out of them clearly in the AG Shop.
3. There is no inspection tag indicating when the eyewash solution is to be changed in the AG Shop. Need to have a system in place to test on a weekly basis.
4. There is fixed-seating the AG classroom. Provide an accessible desk or table.
5. Soap dispenser measured 54 inches in height from the floor ground in the AG classroom. Reach range is 40-48 inches maximum.
6. Door pressure ranges measured 10-19 pounds of pressure throughout the buildings. The maximum allowable pressure is 5 pounds.
7. There are various forms of signage throughout the buildings. Some signage is missing letters or numbers, some have braille and some do not, some have tactile and pictogram images and others do not. There are some rooms that do not have signage.
8. First Aid Kit latch height measured 63 inches from the floor ground in the Metal Shop. Reach range is 40-48 inches maximum.
9. Soap dispenser measured 54 inches in height from the floor ground in the Metal Shop. Reach range is 40-48 inches maximum.
10. Eyewash station did not have an inspection tag to indicate when the lines were tested in the Metal Shop. Set up a system to have weekly testing.
11. The eight welding stations measured 22 inches in width in the Metal Shop. The minimum clear width is 32 inches. The welding stations are currently not in use.
12. There is fixed seating in Room 737, Metal Classroom. Provide an accessible desk or table.
13. The sink has three buttons that are activated at the bottom that do not work in the Auto Shop.
14. The drinking fountain does not work in the Auto Shop.
15. The eyewash station is missing one water head and the station itself does not work in the Auto Shop. Interim measure is to place a portable eyewash station in the Auto Shop.

16. There is so much stuff stacked and jammed into every corner in the Auto Shop. There is a lack of maintaining access in the Auto Shop.
17. There is a gap that measured 12 inches by 11 inches by the door to Greenhouse 1.
18. There are 2 large holes were posts used to be by Greenhouse 1. Safety issue.
19. There is a gap that measured 11 inches by 10 inches by the door to Greenhouse 2.
20. There are round door knobs to Greenhouse 1 and Greenhouse 2.
21. There are greenhouse pallets, furniture, and stuff just outside of the Auto Shop. Set up a system of central location for surplus purposes.
22. Counter top height measured 42 1/8 inches in the Counseling Center. Accessible counters shall be from 28-34 inches maximum above the ground.
23. Shelves above the chairs measured from 49-66 inches in the Counseling Center. Reach range is 40-48 inches maximum.
24. Hand sanitizer, at the door entrance, measured 54 ½ inches at the bottom, 64 ½ inches at the top, and 6 ¼ inches from the wall in the Counseling Center. Reach range is 40-48 inches maximum. This is also considered to be a protruding object.
25. Computer Station Area 1 measured 26 5/8 inches from the floor to the bottom of the table and 29 3/8 inches at the top in Room 700, Sign Making. Knee clearance is a minimum of 27 inches in height. Computer Station Area 2 measured 36 ½ inches at the top. Accessible workstations, tables, and counters shall be from 28-34 inches maximum above the ground.
26. Soap dispenser measured 51 ¼ inches in height from the floor ground in Room 700. Reach range is 40-48 inches maximum.
27. There is a lack of power to run the machines at 220; run at 120 and often the circuits' trip in Room 700, Sign Making.
28. The Boys Restroom across from Room 700 is not accessible. The door width is 29 inches. The minimum clear door width requirement is 32 inches.
29. The Girls Restroom, in the Vocational Building, has sinks that are unwrapped. Need to insulate one at an accessible sink. There shall be no sharp or abrasive surfaces under lavatories or sinks.
30. Paper towel dispenser handle measured 51 ½ inches in height from the floor ground in the in the Girls Restroom, in the Vocational Building. Reach range is 40-48 inches maximum.
31. Soap dispenser measured 57 inches in height from the floor ground in the Girls Restroom, in the Vocational Building. Reach range is 40-48 inches maximum.
32. The Girls Restroom, in the Vocational Building, accessible stall does not have a door handle latch on the outside.
33. Coat hook measured 61 ½ inches in height from the floor in the Girls Restroom, in the Vocational Building. Reach range is 40-48 inches maximum.
34. The workstations in Room 705, Graphic Arts, have varying heights. Workstation Area 1 measured 24 ¼ inches at the bottom of the table to 29 ¾ inches at the top. Knee clearance is a minimum of 27 inches in height. Workstation Area 2 measured 31 ½ inches at the bottom of the table to 37 ¼ inches at the top. Accessible workstations, tables, and counters shall be from 28-34 inches maximum above the ground.
35. Paper towel dispenser measured 50 ½ inches in height from the floor ground in Room 705, Graphic Arts. Reach range is 40-48 inches maximum.

36. Soap dispenser measured 57 ½ inches in height from the floor ground in Room 705, Graphic Arts. Reach range is 40-48 inches maximum.
37. Print Shop coat hooks measured 64 inches in height from the floor in Room 705, Graphic Arts. Reach range is 40-48 inches maximum.
38. Screen printing room divider measured 28 ½ inches in width in Room 705, Graphic Arts. The minimum clear width requirement is 32 inches.
39. Screen printing table measured 25 ¼ inches at the bottom of the table and 26 ½ inches at the top. Knee clearance is a minimum of 27 inches in height.
40. The sink area measured 30 ½ inches at the bottom and 38 ½ inches at the top in the screen printing room in Room 705, Graphic Arts. Knee clearance is a minimum of 27 inches in height and accessible workstations, tables, and counters shall be from 28-34 inches maximum above the ground. There is no forward approach. Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space.
41. Sink counter handles (spindle type) are not accessible in Rooms 310 & 312, Self-Contained Kitchen, that are within reach ranges. Sink handles are to be operable with one hand not requiring tight grasping, pinching, or twisting of the wrist.
42. Microwave measured 56 inches at the bottom and 65 inches at the top in Rooms 310 & 312, Self-Contained Kitchen. Reach range is 40-48 inches maximum.
43. Soap dispenser measured 61 inches in height from the floor ground in Rooms 310 & 312, Self-Contained Kitchen. Reach range is 40-48 inches maximum.
44. Soap dispenser measured 60 inches in height from the floor ground in the Self-Contained accessible restroom, Rooms 310 & 312. Reach range is 40-48 inches maximum.
45. Paper towel dispenser handle measured 58 ¼ inches in height from the floor ground in the Self-Contained accessible restroom, Rooms 310 & 312. Reach range is 40-48 inches maximum.
46. The pipe under the sink is not insulated in the Self-Contained accessible restroom, Rooms 310 & 312. Need to insulate so that there are no sharp or abrasive surfaces under lavatories or sinks.
47. Mirror measured 47 7/8 inches from the floor to the bottom of the mirror in the Self-Contained accessible restroom, Rooms 310 & 312. The maximum allowable height is 40 inches from the floor to the bottom of the mirror.
48. Counter top height measured 36 ½ inches in the Self-Contained accessible restroom, Rooms 310 & 312.
49. The accessible shower is being used as storage in the Self-Contained accessible restroom, Rooms 310 & 312.
50. Drinking fountain measured 26 ½ inches from the bottom, 37 ¾ inches at the spout height, and 18 ½ inches from the wall in the Wrestling Room. This is considered to be a protruding object.
51. Fire extinguisher measured 33 ½ inches at the bottom, 46 ½ inches at the handle, 59 ¾ inches at the top, and 7 ½ inches from the wall in the Trophy Hallway. This is considered to be a protruding object.

52. AED measured 43 ½ inches at the bottom, 51 inches at the handle, 58 ½ inches at the top, and 7 ¼ inches from the wall in the Trophy Hallway. This is considered to be a protruding object.
53. There are no ADA accessible benches or companion seating in the Main Gym.
54. Auxiliary Gym is not accessible. There are 13 steps, a platform, and then another 7 steps to gain access to the Auxiliary Gym.
55. Drinking fountain measured 33 inches from the bottom, 41 inches at the spout height, and 19 ¼ inches from the wall in the Weight Room. This is considered to be a protruding object.
56. The pipe under the sink is not insulated in the Gender Neutral/Staff Restroom in the Main Office. Need to insulate so there are no sharp or abrasive surfaces under lavatories or sinks.
57. Soap dispenser measured 58 ½ inches in height from the floor ground in the Gender Neutral/Staff Restroom. Reach range is 40-48 inches maximum.
58. Paper towel dispenser handle measured 56 inches in height from the floor ground in the Gender Neutral/Staff Restroom. Reach range is 40-48 inches maximum.
59. Mirror measured 43 ½ from the floor to the bottom of the mirror in the Gender Neutral/Staff Restroom. The maximum allowable height is 40 inches from the floor to the bottom of the mirror.
60. Signage to the Nurses Room measures 96 inches above the door. Provide accessible signage to include braille and tactile lettering.
61. Soap dispenser measured 56 inches in height from the floor ground in the Gender Neutral/Staff Restroom. Reach range is 40-48 inches maximum.
62. Paper towel dispenser handle measured 54 ½ inches in height from the floor ground in the Gender Neutral/Staff Restroom. Reach range is 40-48 inches maximum.
63. The path of travel to the accessible restroom in the Nurses Area is blocked by a cabinet that measures 29 ½ inches in width and refrigerator that measures 22 ½ inches in width. The minimum clear width requirement is 32 inches.
64. The pipe under the sink is not insulated in the accessible restroom in the Nurses Area. Need to insulate so there are no sharp or abrasive surfaces under lavatories or sinks.
65. Toilet seat cover measured 55 inches to the center in the accessible restroom in the Nurses Area. Reach range is 40-48 inches maximum.
66. Soap dispenser measured 56 inches in height from the floor ground in the accessible restroom in the Nurses Area. Reach range is 40-48 inches maximum.
67. Paper towel dispenser handle measured 56 inches in height from the floor ground in the accessible restroom in the Nurses Area. Reach range is 40-48 inches maximum.
68. Mirror measured 47 inches from the floor to the bottom of the mirror in the accessible restroom in the Nurses Area. The maximum allowable height is 40 inches from the floor to the bottom of the mirror.
69. Soap dispenser measured 50 ½ inches in height from the floor ground in Room 715, Botany. Reach range is 40-48 inches maximum.
70. Paper towel dispenser handle measured 55 inches in height from the floor ground in Room 715, Botany. Reach range is 40-48 inches maximum.
71. Counter height measured 42 inches from the floor ground at the Attendance Counter and 42 ¾ inches at the Athletic Counter in the Main Office. The maximum height for accessibility is 34 inches from the floor ground.

72. Paper towel dispenser handle measured 51 ½ inches in height from the floor ground in the Gender Neutral accessible restroom in the Vocational Building. Reach range is 40-48 inches maximum.
73. The pipe under the sink is not insulated in the Gender Neutral accessible restroom in the Vocational Building. Need to insulate so that there are no sharp or abrasive surfaces under lavatories or sinks.
74. Turn around radius is limited to 19 ½ inches due to a table placed against the wall in the Gender Neutral accessible restroom in the Vocational Building. Need to remove the table to allow full access.
75. Drinking fountains measured 31 inches from the bottom, 42 ½ inches at the spout height, and 6 ¼ inches from the wall in the Boys Locker Room. This is considered to be a protruding object.
76. Soap dispensers measured 55 inches in height from the floor ground in the Boys Locker Room. Reach range is 40-48 inches maximum.
77. The pipes under the sinks are not insulated in the in the Boys Locker Room. Need to insulate one so that there are no sharp or abrasive surfaces under lavatories or sinks.
78. Mirror measured 46 ¾ inches from the floor to the bottom of the mirror in the Boys Locker Room. The maximum allowable height is 40 inches from the floor to the bottom of the mirror.
79. Drinking fountains measured 31 inches from the bottom, 42 ½ inches at the spout height, and 6 ¼ inches from the wall in the Girls Locker Room. This is considered to be a protruding object.
80. Soap dispensers measured 56 inches in height from the floor ground in the Girls Locker Room. Reach range is 40-48 inches maximum.
81. Paper towel dispenser handles measured 57 ½ inches in height from the floor ground in the Girls Locker Room. Reach range is 40-48 inches maximum.
82. The pipes under the sinks are not insulated in the in the Girls Locker Room. Need to insulate one so that there are no sharp or abrasive surfaces under lavatories or sinks.
83. Mirror measured 46 ¾ inches from the floor to the bottom of the mirror in the Girls Locker Room. The maximum allowable height is 40 inches from the floor to the bottom of the mirror.
84. Coat hook measured 55 ½ inches in height in the accessible stall in the Girls Locker Room. Reach range is 40-48 inches maximum.
85. The Varsity Locker Room in the Boys Locker Room by comparison is larger in size with bigger lockers than the Varsity Locker Room in the Girls Locker Room. Note: Good effort by the district to make certain the girls have a Varsity Locker Room that is in clean, organized, and has similar seating.
86. Counter height measured 42 inches in the ASB Office. The maximum counter height for accessibility is 34 inches from the floor ground.
87. ASB Office signage does not include braille, tactile or pictogram images.
88. Counter height measured 39 ½ inches in the Library. The maximum counter height for accessibility is 34 inches from the floor ground.
89. Fire extinguisher measured 34 ½ inches at the bottom, 49 ½ inches at the handle, 65 ½ inches at the top, and 4 ½ inches from the wall in the Library. This is considered to be a protruding object.

90. There is no accessibility to the Stage in the Commons. There are 6 steps on both sides of the to the Stage. What is the existing path of travel? From the third table in the Commons to the inside door is 363 inches. From the inside door to the outside door of the Band Room is 712 inches. From the outside door of the Band Room to beginning of the ramp to the Music Room is 336 inches. From the beginning of the ramp to the Music Room door is 266 inches. From the Music Room door to the center of the Music Room stage is 336 inches. This causes students who have limited mobility or are in a wheelchair to go outside in the elements. Individuals who have limited mobility may need to stop and pause frequently due to limited stamina to rest before proceeding. This is not reasonable or equitable.
91. There is no accessibility from the Band Room to Room 423 as there are 6 steps in order to access the Commons.
92. Door pressure measured over 30 pounds in the Band Room. The maximum allowable pressure is 5 pounds.
93. There is fixed seating in Rooms 103, 105, 107, 108, 110, 311, 316. Provide an accessible desk or table in each room.
94. Computer workstations measured 26 1/8 inches at the bottom and 27 1/8 inches at the top in Room 224, STEM Building. Knee clearance is a minimum of 27 inches in height. Lab stations measured 25 1/2 inches from the bottom and 29 1/2 inches at the top in Room 224, STEM Building. Accessible lab stations shall be from 28-34 inches maximum above the ground.
95. The identified accessible sink/counters measured 24 1/2 inches at the bottom, 27 1/2 inches at the top in Rooms 210, 218, 222, STEM Building. There is no forward approach.
96. Sink counter handles (spindle type) are not accessible in Rooms 210, 218, 222, STEM Building, that are within reach ranges. Sink handles are to be operable with one hand not requiring tight grasping, pinching, or twisting or the wrist.
97. Soap dispensers measured 54 inches in height from the floor ground Rooms 210, 218, 222, STEM Building. Reach range is 40-48 inches maximum.
98. Safety goggles key opening measured 59 inches in height from the floor in Room 210, STEM Building. Reach range is 40-48 inches maximum.
99. Microwave controls measured 65-69 inches in height from the floor in Room 210, STEM Building. Reach range is 40-48 inches maximum.
100. Paper towel dispenser handles measured 57 inches in height from the floor ground n Rooms 210, 218, 222, STEM Building. Reach range is 40-48 inches maximum.
101. Eyewash station has an inspection tag with no dates of testing indicated in Room 210, STEM Building. Need to have a system in place to test on a weekly basis.
102. The adjustable tables measured 29 1/2 inches at the bar, 31 1/8 inches at the bottom, 32 1/4 inches at the top in Rooms 213, 216, 221, STEM Building. Knee clearance is a minimum of 27 inches in height.
103. The pipes under the sinks are not insulated in the in the Girls Restroom across from Room 205. Need to insulate one so there are no sharp or abrasive surfaces under lavatories or sinks.
104. Toilet seat cover measured 54 inches to the center in the accessible stall in the Girls Restroom across from Room 205. Reach range is 40-48 inches maximum.

105. Medical tables measured 35 ½ inches at the bottom and 38 ½ inches at the top in Room 205, Sports Medicine. An accessible medical table shall be from 28-34 inches maximum above the ground.
106. There is fixed seating in Room 205, Sport Medicine. Provide an accessible desk or table.
107. Soap dispensers measured 53 inches in height from the floor ground in Room 205, Sport Medicine. Reach range is 40-48 inches maximum.
108. Paper towel dispenser handles measured 60 inches in height from the floor ground in Room 205, Sport Medicine. Reach range is 40-48 inches maximum.
109. Eyewash Station waterspout head measured 39 5/8 inches from the floor ground in Room 205, Sport Medicine. Maximum height is 36 inches from the floor ground. It is broken. There is an inspection tag indicated with no current entries.
110. Worktables measured 25 3/8 inches at the bar, 28 ¼ inches at the bottom, and 29 inches at the top in Room 324. Knee clearance is a minimum of 27 inches in height.
111. Kitchen 1 allowed for a forward approach. However, the pipe under the sink is not insulated. Need to insulate so there are no sharp or abrasive surfaces under lavatories or sinks.
112. Microwave handle measured 50 3/8 inches in Kitchen 1. Reach range is 40-48 inches maximum.
113. Soap dispensers measured 55 ¾ inches in height from the floor ground in Kitchen 1. Reach range is 40-48 inches maximum.
114. Paper towel dispenser handles measured 53 ½ inches in height from the floor ground in Kitchen 1. Reach range is 40-48 inches maximum.
115. Clear width distance, by the door, from the chair to the refrigerator measured 23 ½ inches. The aisle width from the chair to Kitchen 1 measured 22 ½ inches. The minimum clear width requirement is 32 inches.
116. There is ADA accessible signage on the outside of the Girls Restroom close to Room 116 that is not accessible. Remove the signage with correct signage without the International Symbol for Accessibility.
117. The workstation/tables measured 26 ½ inches at the bottom and 27 ½ inches at the top in Room 104. Knee clearance is a minimum of 27 inches in height.
118. Soap dispenser measured 55 ½ inches in height from the floor ground in Room 711. Reach range is 40-48 inches maximum.
119. There is no accessibility to the Stage in the Performing Arts Center. There are 3 steps to both sides of the Stage. The center of the Stage has a total of 7 steps.
120. The other access point to the center platform in the Performing Arts Center is down the hall and up a flight of 7 stairs. This is inaccessible for individuals in wheelchairs.
121. There is no accessibility to the Lighting and Sound Booth. There are steps throughout the Performing Art Center.
122. There are no official designated accessible seating areas in the Performing Arts Center. Chairs can be removed in the front row and the International Symbol for Accessibility added for companion seating.
123. There is limited storage in the Performing Arts Center. Sets are broken down and kept in the loft area. Costumes are stored in boxes. Props are stored in boxes and kept in the alcove. Great care is given to try to keep things on stage to be used if possible. The special education restrooms are used as changing areas for performances. Room 224 is used as the Green Room for performances.

124. The running slope of walking surface outside of Performing Arts Center, across from 16th Street, exceeds the maximum slope of 1:20 or 5 percent. Slope ranges from 4 percent to 8.5 percent.
125. The running slope of walking surface outside the Performing Arts Center, by the Tennis Court Parking Lot, exceeds the maximum slope of 1:20 or 5 percent. Slope ranges from 4.7 percent to 10.6 percent.
126. Ramp from Band Room to Music Room exceeds the maximum slope of 1:12 or 8.33 percent. Slope ranges from 8.0 percent to 8.7 percent.
127. Ramp leading to the Boardroom exceeds the maximum slope of 1:12 or 8.33 percent. Slope ranges from 7.2 percent to 10.4 percent.
128. Ramp leading to the back door of the district office exceeds the maximum slope of 1:12 or 8.33 percent. Slope ranges from 23.0 percent to 25.2 percent. There is another accessible path of travel. Need to indicate with directional signage.
129. Main Parking Lot has a total of 312 parking spaces. Currently there are 2 accessible parking spaces with one access aisle. The minimum number of required of accessible parking spaces is 8. For every six accessible parking spaces required, at least one shall be an accessible van parking space that shall be 132 inches wide minimum with an access aisle width of 60 inches minimum. Additional access aisles and signage are required. Access aisles serving parking spaces shall be 60 inches wide minimum. Access aisles shall adjoin an accessible route. Two parking spaces shall be permitted to share a common access aisle.
130. Main Parking Lot has 2 accessible parking space identification signs. The signs measured 43 inches and 41 2/4 inches from the ground floor to the bottom of the sign. Signs shall be 60 inches minimum above the ground surface measured to the bottom of the sign.
131. District Office Parking Lot has a total of 33 parking spaces. Currently there is one accessible parking space with no accessible signage access aisle. Provide accessible signage that measures 60 inches minimum above the ground surface to the bottom of the sign and an access aisle that is 60 inches wide minimum.
132. CTE Building Parking Lot has a total of 48 parking spaces. Two of which are accessible parking spaces with no access aisle. Provide an access aisle to be 60 inches wide minimum.
133. CTE Building Parking Lot has 2 accessible parking space identification signs. The signs measured 43 3/8 inches and 43 1/2 inches from the ground floor to the bottom of the sign. Signs shall be 60 inches minimum about the ground surface measured to the bottom of the sign.
134. Tennis Court/Theater Parking Lot has a total of 9 parking spaces. Currently there are 5 accessible parking spaces with no access aisles. The minimum requirement of required accessible parking spaces is one with an access aisle and signage. Note: Good job of trying to meet the needs of the community.
135. Tennis Court/Theater Parking Lot has accessible parking width spaces that measured, 117 1/2 inches, 118 inches, 119 inches, 120 inches, and one had no striped line on the left side. There is no accessible parking signage or access aisles. Need to reconfigure and restripe.

Recommendations:

1. Provide striping on the floor around the equipment in the AG Shop.
2. Provide striping on the floor around the equipment in the Metal Shop.

The following information are excerpts of what students, teachers, and staff shared from the interviews conducted. It provides an opportunity for reflection, to look at patterns and trends, have discussions, and to take action.

Student Focus Group at W.F. West High School

Comments:

1. School is very welcoming and safe
2. Nice environment
3. Very welcoming environment
4. Welcoming and staff are helpful
5. I get a lot of help and it is great!
6. I feel safe, not nervous
7. School is welcoming
8. Teachers are really nice
9. Feel comfortable at the school
10. Peers and teachers want to help out
11. Everyone is helpful
12. Good school
13. Lots of different options for students
14. Very safe. Haven't seen any physical fights.
15. Many clubs to choose from
16. Lots of sports opportunities
17. Would like to attend the Cornish Performing Arts School
18. Like to work for a scholarship for Naval ROTC
19. Like to attend a four-year college for Law Enforcement
20. Like to attend a two-year college for Computer Engineering
21. Like to attend a four-year college for Drama Therapy
22. Like to attend a four-year college for Graphic Design
23. Will be attending Corban University for an Education degree
24. Like to attend a technical college in Oregon for Diesel Mechanics Technology
25. Like to attend a two-year community college and then a four-year college for Elementary Education.
26. Like to attend a four-year college for Bio-Chemical Engineering.
27. Involved with FFA, LGBQ club, photography, and football
28. Involved with ASL, graphic arts, photography
29. Involved with ASL graphic design, sign making, soccer, cross country
30. Involved with sports medicine, LGBQ club, football, wrestling, baseball
31. Involved with botany, Knowledge Bowl, soccer, softball
32. Involved in robotics, photography, LGBQ club, Jazz Wind Ensemble
33. Involved in ASB, graphic design, drafting, LGBQ club

Things they would like to see changed:

1. Welcoming things of color more than the Latina club as well as LGBTQ club
2. More art classes
3. Want the Culinary Arts classes back
4. More pottery and arts classes
5. Wouldn't change anything
6. Upgrade the school, as ceiling tiles fall on you
7. Update the theatre. Make it bigger. Stage is big, but not for big productions
8. Bigger classrooms
9. More classes offered to sophomores, i.e., Social Science. Right now only offered to juniors and seniors
10. ASL 3 class
11. Another French teacher
12. Additional languages offered and taught: German, Portuguese
13. More recognition for band, music and clubs. When band went to state, there was nothing. When the football team does well, there is a parade.
14. Would like to have things more organized.
15. Would like to have more communication.
16. Equal representation with All the sports, band, choir, theater, and clubs.
17. Batting cages are disgusting
18. Softball practice at Recreational Park, PAC.
19. Boys and girls soccer teams are not allowed to practice on the football field. Have to middle school or Stan Hedwall Park.
20. More open fields. Football team only.
21. School pride is mixed
22. Determining what is Twitter or Instagram worthy. Who decides?
23. A student store that is barely open. Would like to have the option of buying more than pencils, supplies and sportswear.
24. Vending machines

Things they are most proud of:

1. Teachers want to help you
2. Mr. Adams is very helpful
3. The amount of classes you can take
4. We have lots of options
5. AP and College in the High School
6. Running Start
7. The ability to receive college credit in high school
8. Resources for students
9. School is nice
10. Welcoming staff
11. Staff help you to get better all the time
12. Teachers are here to help you
13. Mrs. Chadwick and scholarship opportunities

Chehalis School District Staff Interviewee Comments

1. Community of national origin minority persons with limited English language skills in your service area include: Spanish, Vietnamese, Punjabi, Russian, Chinese (in the past), Marshallese
2. EL students go with interpreters to Centralia College. Go out to lunch. Last year the students went to Centralia College and St. Martin's
3. Latino Summit is very inspirational. Participation with 20-25 students.
4. Use of Language Link and Transact Portal for EL students and parents.
5. Bilingual mentor. Use of Google translate for newcomers.
6. Library has required reading in English and Spanish.
7. Paras have gone into Environment Science. Exams are translated into the student's home language.
8. Para works with counselor for scheduling with EL students. Para is very active with CCR classes.
9. Bilingual people come to school for career days. Spanish speaking Police Officer.
10. Numerous tours at community college, technical colleges, four-year colleges: UW, Western, Central, Eastern, WSU, WSU Vancouver, PLU, and Centralia College. Beatrice makes sure the students are well taken care of.
11. ASL interpreter available and used.
12. All students will apply for college.
13. Chehalis Foundation pays for a Retention Advisor at Centralia College to help W.F. West High School students become successful.
14. AVID program started to focus on Career and College Ready.
15. Burke Group did an independent review of the CTE programs. Waiting on the results.
16. There is a lot of energy lot of energy and excitement about CTE in the district. District sees CTE as an opportunity to benefit more students. It is a mind shift from every student needs to go to college to now Career and College Ready.
17. CTE Programs are important and the programs are getting the attention they deserve.
18. There are new CTE requirements and all that is CTE takes a lot of time.
19. Have a very accepting student body.
20. Flexible, understanding and welcoming of gender nonconforming students.
21. Working on Affirmative Action to assure nondiscrimination practice in employment at the district.
22. High level of female leadership at the district.
23. IEP students out with the general education students and not in a corner.
24. There are no assistive hearing devices in commons and gym.
25. CTE courses promoted through counselors talking with the students, including 8th graders, CTE teachers dovetailing information in their classes to share with students, hyperlinks and pictures of what is happening in CTE, student leader interactions.
26. CTE courses promoted through 8th grade orientation, spring registration, CTE Summer Camp.
27. CTE courses promoted through word of mouth, curriculum guide, flyers, posters.
28. Made CTE videos to promote to students and parents.
29. During registration, students do Career Clusters and turn and talk. Thinking and talking.

30. Counselors work with the 8th grade students and talk about the high school transcript and how it pertains to the future. Have them write out what they might want to do, apprenticeship, military, two-year college, four-year college. Let the students know they are able to change their minds. The world is your oyster and you are the pearl. You get to be the driver.
31. Why is Naviance and CCR time so important? Self-reflection to reinforce. If make a mistake, summer school is available. Students can come back stronger the next year.
32. Career and College Readiness Team helps students to know how to get to where the students need to go.
33. 10th, 11th and 12th grade students can take any summer class at Centralia College. One class in the summer for free. You are starting your college transcript. It will follow you, it can impact your financial aid.
34. It is most impactful to work one-on-one with students. Trying to gain trust with students who have experienced trauma. Worry about someone slipping through the cracks. Heads up. Work as a team.
35. 504s are more frequent and larger than in previous years.
36. Fulltime secretary. Thankful for the support.
37. Special education students are provided what they need. There are many discussions regarding accommodations with teachers, counselors, principals. Not everyone learns at the same rate.
38. Synergy of ASL. Inherent cultural norms. Part of the curriculum to be accepting of individuals regardless of race, gender, color, national origin, or disability.
39. Career awareness activities: Field trip to Portland Airport for Aviation Days.
40. Personal Finance: Pitfalls of credit card debt.
41. Teach finance in photography and sign making classes.
42. Doing photo shoots. Penny Play Ground projects, new baseball fields. New Recreation Park. Did all the headshots for the PUD to update their directory. One of the Retirement Homes. Free Senior class pictures for the yearbook. 15-20 students. Four difference backgrounds. Options provided.
43. Apprenticeship Fair with lots of equipment.
44. Active FFA, SkillsUSA, and Robotics
45. Student involvement is huge with First Robotics.
46. FFA second roster push is at 50-60 students.
47. First at Nationals. The five-member Dairy team is going to Scotland and Ireland.
48. Specialty Graphic Imaging Association (SGIA) competition opportunities for students. One student won second place in the poster contest for the Seattle International Car Show.
49. CTE Metals program has grown as well as the advisory committee that meets on a monthly basis. The condition of the shops were previously not useable. Continuing to bring up to standard with toolboxes and hand tools. Advisory members continue to secure upgraded tools and equipment.
50. The use of Snap and Read for EL students.
51. There is one Precision Machining textbook published in Spanish.
52. There are Biology and Spanish books.
53. The CTE classrooms are run like businesses.

54. SAE projects teach students about business, profit and loss. Students do public relations at the fair.
55. CTE students machined a bell housing for Van Cleve Racing.
56. CTE students make quality t-shirts for sports teams and clubs.
57. SOPs are adhered to in the shops. There are students who need the structure and excel in these classes.
58. Worked hard to create a safe environment and change the culture. Mostly males, to now working with all kinds of people. One person feeling uncomfortable with another student. Addressing how to work with others.
59. All programs are great and useful.
60. How to design the perfect classroom? Classroom and makerspace and additional work spaces. This would allow us to collaborate more. Not a lot of room to grow. Everything is on top of itself. Lots of shuffling. CTE teachers and students work well together.
61. Kitchens are used in Personal and Career Readiness classes.
62. There are lots of CTE singleton classes: welding, auto, drafting
Winter Activities Assembly: FFA students recognized for their achievements.
63. Nothing being done about CTE month. No programs highlighted.
64. Winter Activities Assembly: FFA students recognized for their achievements.
Year 1: Not adding to CTE right now. Waiting for Burke Group review and looking for Steering Committee to review. Hit the pause button right now. Want to have the one of the best CTE programs. Will be intentional about programming. Labor market data. Chehalis Lewis County. Opportunities for students and to meet their needs.
65. Don't want the CTE programs to be a skill center. Want it to feel like it is part of the school and not separate.
66. Chehalis Foundation is very supportive of the needs of students. Every senior receives some type of scholarship.
67. Baby Bears Cats Preschool is supported through CTE and early child education. Funds are now used for supplies.
68. Transforming an empty classroom, Room 711, into a Computer Lab for Graphic Design and Photography students.
69. Transformed science lab stations to be medical tables for Sports Medicine classroom.
70. Room 732 is small, has 20 desks, and sometimes kids have to sit on stools. First class have 30 students and change the layout.
71. ASL students sign up to compete with Art competition and Literature assigned poem. The students work on it and send it digitally.
72. Students able to participate in the ASL Honor Society.
73. FCCLA advisor has spent time trying to navigate the website. The plan is to compete next year. Created curriculum.
74. Pop up shops at football game and wrestling game. Garden show in May.
75. Have a lot of students with IEPs and able to participate in the meetings.
76. Special Education has the IEPs delivered to us and then we go over them during Planning Period.
77. Equity issues are addressed with SafeSchools training at the beginning of each school year, leadership training, and book studies. It is a part of the school culture.

78. Students and parents know about grievance procedures as they are in the Student Handbook. Students have to sign off they have read it. They are also on the school website.
79. There is a Caring Store for students who need clothes, shoes, hygiene products.
80. Teachers work with the students to remind them about empathy. See other people and being in their shoes. Well what can you do? Looking at each person and bridge the gap.
81. Trauma and the Teenage Brain training benefitted all of the teachers.
82. Leadership Team is cultivating a culture of caring.
83. 100 percent of the Seniors are valued. They are in the cap and gown, bused to the elementary and middle school and go through the halls and then carry sign into senior assembly. The entire community is involved.
84. Right Response Training provided for some paras as doing in groups.
85. IEP online migration for consistency and data collection. Easy for teacher to access and upload into Skyward. Still confidential.
86. Able to meet the needs of a grandmother in a wheelchair to watch her grandchild play on the C Volleyball Team. C Team normally plays in the upstairs auxiliary gym, they were moved downstairs and JV was moved upstairs.
87. Girls bowling team won the state championship this year. Last year took second place.
88. Hosted Wrestling Tournament for girls and boys. Great success story.
89. Added two more girls' sports and looking into starting a boys swimming.
90. Have 80 kids playing volleyball at the middle school with six coaches.

Things they would like to see changed:

1. Enough workspace for the students.
2. Have a vestibule for the safety of the students.
3. Too many doors. It is a safety concern.
4. Have IEP At-A-Glance online
5. Pre-K programs. More and more kids coming to us not ready.
6. Need new chairs in the Graphic Design, Screen Print, and Art.
7. No formalized work-based learning opportunities for students.
8. Have an accessible CTE student store to show case items the CTE students make and available for purchase. The current store is not accessible during games and has been handed off from one group to another.
9. Getting away from traditional teaching. Paradigm shift from all college. A degree doesn't mean anything if you don't have a place to go.
10. CTE not being valued or less than. Need to work on dispelling perceptions.
11. Update the CTE Building. It is outdated and not conducive to what they do.
12. Technology
13. There are some haves and some have-nots with classrooms and facilities.
14. Vocational Building to be called Career and Technical Education (CTE) Building.
15. Responsibilities assigned to administrative positions. The requirements for CTE these days requires a fulltime person.
16. Student store. Have Entrepreneurship, but need to offer business and marketing classes.
17. Perception about CTE and CTSOs vs. athletics. The treatment and recognition of athletics and CTSOs are vastly different. What is perceived as low or high value? Cultural and intracurricular. Don't get the fire truck parade like sports.

18. Bigger classroom to teach Personal Finance
19. Would like to have each class be its own, instead of a combined class. Advance students don't get as much time as the other students.
20. Smaller class size. Have 30 students. 24 students would be ideal. Spread thin.
21. Capped at 24 and funded for 28 students.
22. Would like to have another ASL teacher. Able to teach ASL 3 and ASL 4.
23. We are yes people and getting to spread too thin.
24. Would like to have someone assist with 504s as it is taking more and more time and it is currently not funded.
25. More communication and what that might look like or be. Open to whatever those needs might be.
26. Additional training regarding students with disabilities to provide more awareness with everyone at the table. Cannot work in silos. More inclusiveness. It is not a one size fits all.
27. Changing the environment to fit the kids and not the reverse.
28. Have a mindset of "why can't we do that?" We just have to figure it out. Need to talk about it.
29. Provide bathrooms and showers for referees and changing rooms.
30. Boys wrestling and girls' basketball. Need to shower.
31. Add to the batting cages.
32. The stadium bathrooms.

Greatest challenges:

1. Social and emotional needs of students
2. Home life
3. Vaping, drugs and alcohol
4. Mental health, CPS involvement, and homelessness
5. Follow up with the students' families. Connecting them to better services
6. Students finding their passion.
7. Students and differentiation. Teachers are in the classroom with 25-30 kids.
8. Teachers and staff are getting burned out.
9. Better family support at home.
10. How to get the word out to engage the parents
11. Path of travel to the Garden area.
12. Communication
13. Class size in relation to equipment.
14. Struggle to have enough equipment. Have six laves with three students to a machine. It takes a student an hour for a lave project to be done with just one student. Have to allow for more time, due to not enough machines.
15. Keeping up with industry and technology standards.
16. Students have lots of options. Trouble finding open spots and fulling actual graduation requirements. Some of the classes are so full and big that students don't get as much time on machines as they should.
17. Have so many IEP and 504 students. English to ASL is challenging. Hard to group kids. If you don't know what you are doing, it is obvious.

18. 504s are more frequent and larger this year than in previous years.
19. Systems issue with the level of rigor and pace to achieve the same goals is unrealistic for all students. Imposed deadline that every student should graduate in four years. Core 24 makes things challenging.
20. The demands on teachers being asked to do more and more.
21. Rise in anxiety with the students. How to connect to school and with at least one adult to be successful.
22. Have 300-student caseload. There are so many students with mental health needs. Schedule to see the students and communicate with them. Make sure emotionally okay and feel supported.
23. IEP ASL or Advanced ASL.
24. Students making good decisions. Not destroying stuff or trying to impress others. Being responsible.
25. Social media and how fast things happen. Attention spans are short. Provide instruction in small chunks. 30 seconds let them do and try. Lots of different stimulations. More creative. Kids won't talk to you. Take over all of the computers in the class. Open up the text lines.
26. Wish the students didn't have cell phones in class.
27. How many classes required to teach?
28. Getting spread thin. Trying to find the Balance and doing a good job for students.
29. Asked to do more. Administration helps us to balance. Mindfulness to solve problems.
30. Getting everything done. Want everyone to graduate and have the opportunities to receive scholarships.
31. Newcomers and the academic and language gap. Some of them have interrupted studies and place them as freshman in order to give them as much opportunity as possible to obtain credits and learn English. Having Beatrice has eased the anxiousness of the teachers.
32. Cluster the EL newcomers in the rooms with the teachers. Algebra 1 class (teacher open to having translation going on and identifying gaps).
33. Home support for EL students. Parents grew up in a different educational system. Teaching them what their responsibilities are. Do not have a Migrant Recruiter.
34. Have 18 of the 34 EL students in CTE classes.
35. So many expectations from the state and not a lot of guidance. Things take time to adjust courses, obtain curriculum, and train teachers.
36. The way the girls' participation needs to be 100 percent equal to boys' football. Why can't the girls have soccer on Friday nights? Constant equality and paying tribute to other sports. Working hard to be transparent. Boys and girls given equal opportunities to shine.
37. Remind teachers to be patient, flexible, and understanding. A lot of kids don't know if they are coming and going. Making sure someone believes in them and they have hope. Not always college but other options available to pursue.

Things they are most proud of:

1. Kids here are great!
2. Wonderful ties to the community. It is about providing excellent opportunities for the students.
3. Student Achievement Initiative
4. Instructional practices
5. Students are able to earn something beyond a high school diploma.
6. The rapport that we have with the student and the influence.
7. Anodizing line on wheels to address lack of space.
8. There is something happening at the school. Students are engaged.
9. Students come to school every day because of shop classes.
10. Leadership is always willing to develop programs. Supportive of purchasing equipment and being open minded.
11. Not micromanaged.
12. Really great CTE staff!
13. Offer lots of great things for kids and lots of options.
14. Super impressed about how W.F. West High School teachers are successful in helping students. They go above and beyond. Great!
15. All great! Lots of collaboration, work together well, and help with projects.
16. Found niches that are really cool. Thrive in ASL or aviation.
17. Atmosphere and the culture of W.F. West High School. If you need something, they will find a way to get it. Kids for the most part care for each other.
18. Love the CTE Department!
19. Have a really good counseling team!
20. Do a good job of celebrating each kid as an individual and as a team.
21. Good cohesive team with the teachers, administrative support, and counselors. Very fortunate!
22. Have lots of great scholarship opportunities for students. There is a \$1M endowment just for CTE. Just the interest \$60,000 a year. Kids going to trade schools, buying tools. Internship opportunities and paying kids a stipend. Lot of things available for kids.
23. It is like a family here. At the end of the day, on the same team.
24. Great place to work!
25. Good job with employee orientation.
26. Migrant Pack Group: Make connections with parents. Meet at the public library. Growing every year over the last four years. Emma does home visits on occasion.
27. Quality individual support to EL students at each site.
28. People, kids, community.
29. Culture of finding a way to solve every problem.
30. Know students strengths and weaknesses.
31. We are small and yet have so many offerings.
32. Girls' bowling team success.
33. People like to work here. There is longevity.
34. The Chehalis Foundation is very supportive of the district.
35. Good community that supports the kids.

Discussed the MOA Civil Rights Onsite Review Timeline

1. Letter of Finding (LOF) will be sent to district.
2. I will send VCP template. District has 90 days to submit a Voluntary Compliance Plan (VCP). District to indicate who is responsible for each finding. Need to indicate month and year for corrective action to be done for each finding. Superintendent will date and sign. Typically, the VCP is to be completed within one year. The maximum timeframe for corrective action items is two years and approved on a case-by-case basis. I ask that I be a part of the VCP draft process in order to come to agreement within timeframe.
3. Once VCP is signed and dated by Superintendent, then begins the Monitoring Phase. District to show due diligence. Submission of photographic evidence and documentation.
4. It is a partnership. I am here to assist throughout the process. Please email or call with questions.

Again, thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability;*
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Therefore, school district individuals may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

I will be preparing an official Letter of Finding. In the meantime, if you have questions, please give me a call or email me.

Thank you.

Deifi Stolz

Office of Superintendent of Public Instruction
Methods of Administration Program Supervisor
Career and Technical Education
600 Washington Street SE | Olympia, WA 98501
360-725-6254 | deifi.stolz@k12.wa.us

MOA Letter of Findings 2018-2019

The following subrecipients Letter of Findings were included in the 2016-2018 Biennial Compliance Report Supplemental to OCR on April 12, 2019.

- Stanwood-Camano School District (Stanwood High School, Lincoln Hill High School, Stanwood Middle School)
- Lopez Island School District (Lopez Island High School)
- Pierce County Skill Center

They are not included in this report.

MOA Letter of Findings 2019-2020

The following subrecipients received an MOA Civil Rights onsite review in 2018-2019 and MOA Letter of Findings during 2019-2020.

- Bethel 1 (Bethel High School, Graham-Kapowsin High School)
- Bethel 2 (Spanaway Lake High School, Challenger High School)

The following subrecipient received an MOA Civil Rights onsite review and MOA Letter of Findings during 2019-2020.

- Selah School District (Selah High School, Selah Academy)



SUPERINTENDENT OF PUBLIC INSTRUCTION

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

July 22, 2019

Superintendent Thomas G. Seigel
Bethel School District
516 176th Street E.
Spanaway, WA 98387

Civil Rights Review Letter of Findings (LOF)

Dear Superintendent Seigel:

On June 5-6, 2018, Deifi Stolz, Methods of Administration (MOA) Coordinator, Dan Tedor, Science, Technology, Engineering and Math Program Supervisor, and Debra Durupt, Grants and Innovative Programs Program Supervisor for the Office of Superintendent of Public Instruction (OSPI), and Maryam Jacobs, from the State Board for Community and Technical Colleges conducted an onsite civil rights compliance review of the Career and Technical Education (CTE) programs and support services of Bethel High School and Graham-Kapowsin High School. The purpose of the review was to determine the compliance status of the district's CTE programs and facilities with Federal Civil Rights laws.

As explained during the review, and subsequent phone calls and email correspondence, the Letter of Findings (LOF) summarizes the observations and conclusions reached as a result of this onsite visit. Our office appreciates the advanced district's documentation and for having staff members available during the compliance review.

Thank you for the district's cooperation and support in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability;*
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

This LOF is a formal follow-up to the exit interview, which was conducted on June 5-6, 2018. This letter details noncompliance issues and required corrective actions. The purpose of an LOF is threefold:

1. To recommend changes, which, although not violations of Civil Rights laws, would enhance the experience of all students at the Bethel School District;
2. To summarize the specific instances of noncompliance identified during the onsite review; and
3. To provide notice of requirement to the district to submit a final Voluntary Compliance Plan (VCP) to OSPI, **90 calendar days from the date of receipt of this letter and no later than October 28, 2019**. Only the items identified as “Findings” must be addressed. Recommendations need not be addressed in the VCP.

The VCP must:

1. List each specific instance of noncompliance identified in the LOF and provide the district’s detailed plan of action to correct each finding.
2. Establish and provide a timetable for remediation of each instance of noncompliance, including month and year.
3. For each corrective action, provide to OSPI, as appropriate, documentation, links to website, photographic evidence.
 - a. In the efforts to bring action items into compliance, the subrecipient may request technical assistance from OSPI.
 - b. A follow-up onsite review may be requested by the subrecipient for OSPI to verify the completion of corrective action items.
4. Identify the personnel responsible for implementing each planned activity. The VCP must be signed and dated by the district superintendent.

The following findings are based upon a review of practices and procedures at the Bethel School District, including data and materials submitted, discussion with the staff members compiling the documentation for the review, interviews with administrative and building staff, students, and onsite observations of programs and facilities.

Items of noncompliance are identified below in the same order as the Onsite Civil Rights Compliance Checklist. The statutory authority precedes description of the finding.

COMMENDATION

The Bethel School District, Bethel High School and Graham-Kapowsin High School, is to be commended for its commitment to evaluating, re-evaluating, updating and expanding all CTE program areas.

Bethel School District has looked at the 16 Pathways/Career Clusters established at the national level, that are recognizable across the United States, and have combined them into 7 Pathways more closely aligned to their course offerings: Arts and Communications, Business and Marketing, Engineering and STEM, Information Technology, Health Science, Human Services, and Science and Natural Resources.

Exploratory and preparatory courses are clearly outlined as well as postsecondary training options and potential careers. Two great examples are Bethel High School’s Air Force JROTC program offering and Graham-Kapowsin High School’s Army JROTC program offering that have opened up doors for students who would not otherwise have a place where they could tap into their full potential as leaders.

Interviews with students, staff, teachers, and administrators indicated Bethel High School and Graham-Kapowsin High School provide a tremendous amount of ongoing support services to students. All interviewees stated that teachers, staff and administrators are active in ensuring students receive all services available and are working towards ensuring all students feel supported and have a sense of inclusion.

The students are thriving with all of the opportunities they are provided as they enter the workforce, military, apprenticeship, technical school, community college or four-year college.

ADMINISTRATIVE

In order to comply with United States Department of Education guideline requirements for Career and Technical Education programs, school districts, and skill centers, must have in place basic procedures regarding federal statutes and implementing departmental regulations: 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, as well as *Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*.

There are four basic administrative requirements:

1. Designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II (Title IX (34 CFR Part 106.8(a)); Section 504 (34 CFR Part 104.7(a)); Title II (28 CFR Part 35.107); Guidelines (IV. O.).
2. Annual public notice of nondiscrimination (Guidelines IV.O.)
3. Continuous notification of nondiscrimination (Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106) and,
4. A grievance procedure that allows students and parents an avenue for dealing with alleged discrimination (Title IX (34 CFR Part 106.8(b)); Section 504 (34 CFR Part 104.7(b)); Title II (28 CFR Part 35.107(b)).

Citations: Title II (28 CFR § 35.106-107)
Title VI (34 CFR § 100.6(d))
Title IX (34 CFR § 106.8-9)
Section 504 (34 CFR § 104.7-8)
Guidelines (IV. O.)

| Finding | Required Corrective Action |
|--|---|
| <p>1. The Bethel School District did not publish, post or disseminate the annual nondiscrimination statement. The statement was not published in the Bethel News or in the appropriate language for communities of national origin with limited English proficiency. As identified, there is a national origin community of Spanish speaking individuals within district boundaries.</p> <p>(Guidelines IV. O.; Title VI (34 CFR § 100.6(d))</p> | <p>1. The Annual Notification must be published and disseminated prior to the beginning of school and include a brief summary of CTE program offerings, admissions criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. The statement must also include language indicating lack of English language proficiency will not be a barrier to admission and participation in career and technical education programs.</p> <p>As identified, the national origin community of Spanish speaking individuals in Bethel School District should receive this notification in similar fashion within district boundaries. All other identified communities (if there are others so designated) should receive this notification in their language of national origin as required.</p> <p>The district is to place the Annual Notification in the Bethel News, on the district’s main website homepage, and on each high school and middle school website homepages.</p> |
| <p>2. Inconsistent use of the comprehensive continuous nondiscrimination statement (based on a review of materials including district newsletters, bulletins, press releases, brochures, handbooks, school calendars, course catalogs, admissions materials, job announcements, district and high school websites, etc.).</p> <p>There are various versions of what should be the consistent version of the comprehensive continuous nondiscrimination statement.</p> <p>The Bethel School District High School Course Catalog 2017-18 School Year did not include the protected class of sex.</p> | <p>2. The district should include the consistent comprehensive continuous nondiscrimination statement in the Bethel School District High School Course Catalog, Bethel School District’s Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation, Bethel School District’s Student Calendar, Bethel School District’s Career & College Readiness Career & Technical Education Community Report, Bethel School District’s Bullying brochure, The Eagle’s Nest, Bethel School District’s Family and Student Access brochure, Bethel School District’s Homeless brochure, Bethel Pride,</p> |

The Bethel School District's Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation did not include the protected class of sex nor include person(s) designated to handle inquiries, phone numbers, or addresses.

Bethel High School's The Career & Technical Education Marketing Sales & Service brochure did not include person(s) designated to handle inquiries, phone numbers, or addresses. The Bethel School District's Student Calendar 2017-18 and the Bethel School District's Career & College Readiness Career & Technical Education Community Report 2016-17 did not include the *address* for the Title IX Officer, Section 504 Coordinator, Executive Director for Special Education, Executive Director for Human Resources, Civil Rights Coordinator, and Director of Equity and Achievement.

The Bethel School District's Bullying brochure, The Eagle's Nest, August 2017, The Eagle's Nest, January 2018, The Eagle's Nest, May/June 2018 did not include the *address* for the Assistant Director of Human Resources or the Executive Director of Special Services.

The Bethel School District's Family and Student Access brochure, Bethel School District's Homeless brochure, Bethel Pride, August 2015, Bethel Pride, April 2016, Bethel Pride, November/December 2017, Bethel Pride, January/February 2018, Bethel School District's Career & College Readiness Career & Technical Education, May 2017 did not include the *address* for the Title IX Officer, Section 504 Coordinator, and Compliance Coordinator for Civil Rights Laws.

The comprehensive continuous nondiscrimination statement wasn't included in the following Bethel School District items:

Bethel High School Student Handbook, Graham-Kapowsin High School Student Planner, Graham-Kapowsin High School Career and Technical Education Course Offerings, Graham-Kapowsin High School 9th Grade Course Selection Form, Graham-Kapowsin High School 10th Grade Course Selection Form, Graham-Kapowsin High School 11th Grade Course Selection Form, Graham-Kapowsin High School 12th Grade Course Selection Form, Employee Safety & Health Handbook, The Brave Times, CTE Insider Career & College Readiness Newsletter, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, Intro to Lifetime Fitness, High School and Beyond Plan form, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form, CTE recruitment materials, flyers, brochures, publications, press releases, as well as in an obvious location on each school website, just like it is on the district website.

| | |
|---|--|
| <p>Bethel High School 2017-18 Student Handbook, Graham-Kapowsin High School 2017-18 Student Planner, Graham-Kapowsin High School Career and Technical Education Course Offerings, Graham-Kapowsin High School 9th Grade (Class of 2022) Course Selection Form, Graham-Kapowsin High School 10th Grade (Class of 2021) Course Selection Form, Graham-Kapowsin High School 11th Grade (Class of 2020) Course Selection Form, Graham-Kapowsin High School 12th Grade (Class of 2019) Course Selection Form, Employee Safety & Health Handbook 2017-18, The Brave Times, December 8, 2017, The Brave Times, January 9, 2018, The Brave Times, February 1, 2018, The Brave Times, March 2, 2018, CTE Insider Career & College Readiness Newsletter, November 2017, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, Intro to Lifetime Fitness, Special Services Young Athletes Field Day Service Opportunity flyer, High School and Beyond Plan form, Career and Technical Education Work Based Learning-Employed (CTW2017) Syllabus, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form.</p> <p>Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106).</p> | |
|---|--|

Recommendations:

1. A sample annual nondiscrimination notice may be found at the OSPI website: <http://www.k12.wa.us/CareerTechEd/CivilRights.aspx>.
<http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx>
2. Sample comprehensive continuous nondiscrimination notices may be found at the Office for Civil Rights website: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. For state nondiscrimination requirements, visit <http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx>.

RECRUITMENT

Recipients must conduct their recruitment activities in a manner that does not exclude or limit opportunities on the basis of race, color, national origin, sex or disability. Recruitment material descriptions of career and occupational opportunities are not to be limited on the basis of race, color, national origin, sex or disability. To the extent possible, recruiting teams should represent persons of different races, national origins, sexes and disabilities. Recipients must ensure that career counselors can effectively communicate with students with disabilities and students with limited English proficiency. Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration. If a recipient’s service area contains a community with persons of limited English proficiency, information must be available and distributed to that community in its language.

Citations: Title IX (34 CFR § 106.23(a)(b))
Guidelines (V. A., C., E.)

| Finding | Required Corrective Action |
|---|---|
| <p>1. Based on review of recruitment materials (including course catalog, brochures and marketing materials, staff demographics, plans for the provision of services, samples of materials in other languages, etc.), interviews, and onsite walk-through, the district’s service area contains a national origin community of Spanish speaking individuals in Bethel School District with limited English language skills.</p> <p>There was a publication for enrollment and a poster with FAFSA information published in Spanish. There are publications available in other languages digitally in the Guidance and Counseling Offices and library. The majority of the publications were in English.</p> <p>Guidelines (V. E.)</p> | <p>1. Provide and distribute recruitment promotional materials, brochures, pamphlets, scholarships, internships, apprenticeships, industry-based certification and licensure information, transcript requests, course catalog, and other current promotional materials published in Spanish in the Main Office, Guidance and Counseling Offices, and library.</p> |

ADMISSIONS

Admissions policies, procedures, and criteria may not exclude students from CTE programs on the basis of race, color, national origin, disability, or sex, including pregnancy, childbirth, and termination of pregnancy. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex or persons with disabilities, the criteria should be validated as essential to success in the program. Pre-admissions inquiries about marital status must be avoided or from applying any rule concerning the parental status of a student or applicant that discriminates on the basis of sex.

Citations: Title IV (34 CFR § 100.3(a) and (b)(1)(v))
Section 504 (34 CFR § 104.4(a)(b))
Guidelines (IV. A., F., K., L., N.)

Findings: Based on review of materials (including admissions policies, admission applications, enrollment data, etc.), interviews, and onsite walk-through, no evidence of findings was observed during this onsite review. Disproportionality within programs, in regards to race, was evaluated and analyzed based on community, school, and program enrollment demographic data. Interviews with the leadership team, administrators, and students did not indicate that the disproportionality was the result of discrimination.

Required Action: No action required at this time.

STUDENT FINANCIAL ASSISTANCE

Financial assistance is available to all students regardless of sex, race, color, national origin or disability. Education agencies shall not limit honors, awards and scholarships to a group on the basis of race, color, national origin, sex or disability unless such targeting is done to provide opportunities to members of a group that has traditionally not been represented. Outside agencies that provide awards are to be notified of the agency's nondiscrimination policy. A school district may administer or assist in the administration of scholarships or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, and similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarship on the basis of sex, race, national origin or disability.

Because financial aid is often the stumbling block for those historically underrepresented in postsecondary education, secondary schools should assist all students preparing for postsecondary experiences, including disadvantaged students, to become aware of this requirement. If a recipient's service area contains a community of national origin minority persons with limited English language skills, material and information used to notify students of financial aid opportunities must be disseminated to that community in its language.

Citations: Title VI (34 CFR §§ 100.3(a)(b))
Title IX (34 CFR § 106.37)
Section 504 (34 CFR § 104.4(a)(b))
Guidelines (VI. B.)

Findings: Based on review of materials (including financial aid data, materials for students regarding financial aid, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: No action required at this time.

CAREER COUNSELING PROGRAM

Counseling programs may not include steering of students toward particular courses or programs that are traditional for the student's race, color, national origin, English language proficiency, sex or disability. Services and materials related to career counseling and recruitment must be free of discrimination and stereotyping in language, content and graphic illustration. If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

Citations: Title VI (34 CFR §§ 100.3(a)(b))
 Title IX (34 CFR § 106.36)
 Section 504 (34 CFR §§ 104.4(a)(b), 104.37(b))
 Guidelines (V. A., B., D.)

Findings: Based on review of materials (including promotional and recruitment materials, enrollment demographics and admission policies), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: No action required at this time.

SERVICES FOR STUDENTS WITH DISABILITIES

A qualified person with a disability may not, on the basis of disability, be excluded from, denied benefits of, or subjected to discrimination in any course, program or activity. A recipient may not restrict access for students with disabilities to schools, programs, services and activities. Section 504 and ADA, Title II are based upon the premise that students with disabilities will be integrated with their non-disabled peers to the extent possible.

Citations: Title II (28 CFR 35.130)
 Section 504 (34 CFR §§ 104.4(a), 104.33-36)
 Guidelines (IV. N.)
 Guidelines (VI. A.)

Required Action: No action required at this time.

RECOMMENDATION

During Bethel School District’s onsite review, the following was observed and identified at Bethel High School:

| Identified Issue | Recommended Solution |
|--|--|
| <p>1. The Special Education Director works well with the school counselors, however some of the interviewees indicated there are no mechanisms to receive information for EL students unless they also have a 504 plan or an IEP.</p> <p>Furthermore, some of the teachers interviewed stated they have a para educator and others do not. They would like to see equitableness in this process.</p> | <p>1. Provide additional collaborative time with the counselors, teachers and staff and additional time in the buildings in order to help students in a purposeful manner.</p> <p>2. Set up an equitable system for use of para educators and an assessment process to see the need for additional para educators and resources for students whether they are on an IEP, 504 Plan or need EL services.</p> |

ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its program or service due to inaccessibility of facilities, according to Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990. All agencies are responsible for compliance with Section 504 and Title II. Applicable accessibility standards are determined by the date the facility was constructed or last altered. In general, in the case of a facility's alteration, only the altered portion is affected. The standards are as follows (ANSI, UFAS, 1991 ADA Standards, and 2010 ADA Standards):

- Existing facilities/Section 504 (34 CFR, § 104.22 and 28 CFR § 35.150) – construction or alteration initiated before 6/4/1977. Programs or activities offered in existing facilities must, when viewed in their entirety, be readily accessible to persons with disabilities.
- New construction/Section 504 (34 CFR § 104.23) – construction or alteration initiated between 6/4/1977 and 1/17/1991. Facilities follow American National Standards Institute, Inc. (ANSI) A117.1-1961 (R1971).
- New construction/Section 504 (34 CFR § 104.23) – construction or alteration initiated on or after 1/18/1991 and before 1/27/1992. Facilities follow the Uniform Federal Accessibility Standards (UFAS) Appendix A to 41 CFR subparts 101-19.6.
- New construction/Americans with Disabilities Act Title II (Appendix A of 28 CFR Part 36)
 - For construction or alteration initiated on or after 1/27/1992 facilities followed Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADA Standards)¹ Appendix A of 28 CFR Part 36, or may have elected to follow UFAS Appendix A to 41 CFR subpart 101.
 - For construction or alteration initiated on or after 3/15/2012 facilities follow the 2010 ADA Standards.² For construction or alterations initiated between 1/27/1992 and 3/15/2012, the UFAS, the 1991 ADA Standards (without the elevator exemption) or the 2010 ADA Standards may be used. Only one standard may be used for each building or alteration.
 - The UFAS, the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between 9/15/2010 and 3/15/2012.

Citations: Title II (28 CFR §§ 35.133, 35.149-151)
Section 504 (34 CFR § 104.21-23)
Guidelines (IV. N.)

All violations are noted below. Where no violation is noted, no evidence of findings was observed during this onsite review. Bethel School District facilities were examined for accessibility, based on the applicable standards for construction and alteration:

- Parking: Based on standards for slope, sufficient spaces, appropriate space sizes, and correct signage.
- Signage: Based on standards for signage, buildings, facilities and accessible passageways.
- Entrances and Exits: based on standards for thresholds, force required to open, walkways, clearance, handle requirements, etc.
- Ramps: Based on standards for appropriate slopes, with handrails.
- Interior Doors: Based on standards for operable door handles, door clearances, automatic openers (where available), and force required to open.

¹ Note: There are two sets of ADA Standards: one that was issued in 1991 and a second issued in 2010.

² The 2010 ADA Standards are available at:

<http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.pdf>

- Accessible Route: Based on standards for hallway displays, grade changes, accessible aisles, elevator requirements, carpeting, ramps, stairs, etc.
- Services: Based on standards for services regarding water fountains, fire alarm systems, evacuation plans, restricted areas, etc.
- Student Lockers: Based on standards for student lockers.
- Ramps: Based on standards for ramps, including surface, grade, railing, length, etc.
- Elevators: Based on standards for elevator accessibility.
- Telephones: Based on standards for telephones.
- Restrooms: Based on standards for unisex, female and male-identified restrooms, including signage, sinks, mirrors, pipes, dispensers, reach, stalls, doors, etc.
- Counselor Offices: Based on the standards for counselor offices, including counter height.
- Library: Based on the standards for libraries, including table height, aisles, stack height, service counters, computer stations, etc.
- Assembly Area: Based on the standards for assembly areas.
- Career Centers: Based on the standards for career centers, including location, aisles, workstations, etc.
- Classrooms: Based on the standards for classrooms, including aisles, workstations, dispensers, eyewash stations, doors, sinks, etc.

FACILITIES CHART

| School | Building | Beginning of Construction | Accessibility Standard | Date/Type of Alterations | Accessibility Standard for Alteration |
|-----------------------------|--|---------------------------|-------------------------|--|--|
| Bethel High School | 22215 38 th Ave. E., Spanaway, WA 98387 | 1952 Original Building | Readily Accessible (RA) | 1971 Modernized | RA |
| | | Torn down in 1989 | | 1979 Gym, Library and Shop Addition | American National Standards Institute (ANSI) |
| | | | | 1989 Building Modernization | ANSI |
| | | | | 2011 Building A (Music & Arts) Modernization | 1991 ADA Standards |
| | | | | 2012 Science Classrooms Remodeled | 2010 ADA Standards |
| | Main Office | 1971 | RA | 1989 Modernization | ANSI |
| | Attendance Office | 1971 | RA | 1989 Modernization | ANSI |
| | Guidance and Counseling Office | 1971 | RA | 1989 Modernization | ANSI |
| | Career Center | 1971 | RA | 1989 Modernization | ANSI |
| | Cafeteria/ Commons | 1971 | RA | 1989 Modernization | ANSI |
| | Library | 1979 | ANSI | 1989 Modernization | ANSI |
| Auditorium | 1971 | RA | 1989 Modernization | ANSI | |
| Main Gym | 1979 | ANSI | 1989 Modernization | ANSI | |
| Small Gym | 1979 | ANSI | 1989 Modernization | ANSI | |
| Boys and Girls Locker Rooms | 1971 | RA | 1989 Modernization | ANSI | |

| | | | | |
|---|------|--|--------------------|--------------------|
| Weight Room | 1971 | RA | 1989 Modernization | ANSI |
| Bldg. A, Choir, Band and Practice Rooms | 1971 | RA | 2011 Modernization | 1991 ADA Standards |
| Classrooms | 1971 | RA | 1989 Modernization | ANSI |
| Science Classrooms | 1971 | RA | 2012 Remodeled | 2010 ADA Standards |
| Small Engine Classroom 121 | 1971 | RA | 1989 Modernization | ANSI |
| Art Room 217 | 1971 | RA | 1989 Modernization | ANSI |
| Special Ed, Room 220 | 1971 | RA | 1989 Modernization | ANSI |
| Building B, Sports Medicine | 1978 | ANSI | N/A | N/A |
| Greenhouse (Path of travel is paved) | 1990 | ANSI | N/A | N/A |
| Portable 1 | 1992 | 1991 ADA Standards | N/A | N/A |
| Portable 2 | 1992 | 1991 ADA Standards | N/A | N/A |
| Portables 3-4 | 1980 | ANSI | N/A | N/A |
| Portable 5 | 1992 | 1991 ADA Standards | N/A | N/A |
| Portable 6 | 1990 | ANSI | N/A | N/A |
| Portable 7 | 1992 | 1991 ADA Standards | N/A | N/A |
| Portable 8 | 1991 | Uniform Federal Accessibility Standards (UFAS) | N/A | N/A |
| Portable 9 | 1991 | UFAS | N/A | N/A |
| Portable 10 | 1992 | 1991 ADA Standards | N/A | N/A |
| Portables 11-12 | 2001 | 1991 ADA Standards | N/A | N/A |
| Portable 13 | 2002 | 1991 ADA Standards | N/A | N/A |
| Portables 14-15 | 2003 | 1991 ADA Standards | N/A | N/A |

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| | Portables 16-17 | 2004 | 1991 ADA Standards | N/A | N/A |
| | Portables 18-19 | 2019 | 2010 ADA Standards | N/A | N/A |
| | Portables 20-21 | 2019 | 2010 ADA Standards | N/A | N/A |
| | Front of Building/ Visitor/Staff Parking Lot | 1971 | RA | Repaved 2011 Restriped 2016 Restriped every three years or as needed. Signage Added 2018 | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |
| | Student Parking Lot | 1971 | RA | Resealed 2011 Restriped 2016 Restriped every three years or as needed. Signage Added 2018 | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |

Note: Uniform Federal Accessibility Standards (UFAS), the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between September 15, 2010 and March 14, 2012. Any corrective action initiated on or after March 15, 2012 must comply with the 2010 ADA Standards.

Bethel High School

| Finding | Required Corrective Action |
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| <p>1. Door opening force to the doors was excessive, making it not easily operable and did not make the program areas readily assessable in the Main Office Right Restroom (measured 15 pounds of pressure), Main Office Left Restroom (measured 15 pounds of pressure), Cafeteria/Commons (measured 10 pounds of pressure), Room 105 (measured 9 pounds of pressure), Room 106 (measured 10 pounds of pressure), Room 107 (measured 14 pounds of pressure), Room 108 (measured 11 pounds of pressure), Room 108A (measured 17 pounds of pressure), Room 109 (measured 20 pounds of pressure), Room 114 (measured 11 pounds of pressure), Room 115 (measured 14 pounds of pressure), Room 116 (measured 13 pounds of pressure), Room 118 (measured 8 pounds of pressure), Room 119 (measured 9 pounds of pressure), Room 121 (measured 12 pounds of pressure), Room 122 (measured 7 pounds of pressure), Room 201 (measured 8 pounds of pressure), Room 202 (measured 8 pounds of pressure), Room 203 (measured 8 pounds of pressure), Room 204A (measured 14 pounds of pressure), Room 207 (measured 12 pounds of pressure), Room 208 (measured 8 pounds of pressure), Room 209 (measured 8 pounds of pressure), Room 210 (measured 8 pounds of pressure), Room 211 (measured 8 pounds of pressure), Room 213 (measured 8 pounds of pressure), Room 214 (measured 8 pounds of pressure), Room 216 (measured 7 pounds of pressure), Room 217 (measured 8 pounds of pressure), Student Store (measured 10 pounds of pressure), Library (measured 11 pounds of pressure), Career Center (measured 7 pounds of pressure), Auditorium (measured 11 pounds of pressure), Theater Men’s Dressing Room (measured 16 pounds of pressure), Men’s Restroom, outside of Gym, (measured 12 pounds of pressure), Women’s Restroom, outside of Gym, (measured 15 pounds of pressure), Men’s Locker Room (measured 12 pounds of pressure), Women’s</p> | <p>1. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |

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| Locker Room (measured 14 pounds of pressure). (ANSI, 5.3 Doors and Doorways) | |
| 2. Door opening force exceeds the maximum allowable pressure of five pounds to Room 124 (measured 12 pounds of pressure). (1991 ADA Standards, 28 CFR Part 36, 4.13.11 Door Opening Force) | 2. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) |
| 3. Door opening force exceeds the maximum allowable pressure of five pounds to Room 110 (measured 10 pounds of pressure), Room 111 (measured 18 pounds of pressure), Room 111A (measured 17 pounds of pressure), Room 112 (measured 21 pounds of pressure), Room 113 (measured 11 pounds of pressure), Room 113 A (measured 15 pounds of pressure), Room 120 (measured 11 pounds of pressure), Room 123 (measured 14 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | 3. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) |
| 4. There was no directional identification signage on the wall outside of the Main Office Right Restroom and Main Office Left Restroom and along the accessible route indicating where the closest accessible restrooms are located. (ANSI, 5.11 Identification) | 4. Provide directional signage to the closest accessible restrooms on the outside of the restrooms and along the route, both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility) |
| 5. Exposed drain pipes in the Men's Second Floor Restroom and Women's Second Floor Restroom. (ANSI, 5.6.3) | 5. Insulate exposed pipes under lavatories and sinks to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces) |
| 6. Paper towel dispenser exceeds the maximum allowable height of 40 inches from the floor ground in the Main Office Right Restroom (measured 62 inches), Main Office Left Restroom (measured 62 inches), Room 106 (measured 59 inches), Room 108 (measured 55 inches), Room 109 (measured 56 inches), Room 122 (measured 55 1/2 inches), Men's Second Floor Restroom (measured 57 inches), | 6. Provide paper towel dispenser to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) |

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| <p>Women's Second Floor (measured 57 inches), Commons (measured 73 inches), Student Store (measured 63 1/2 inches), Theater Men's Dressing Room (measured 63 inches), Women's Restroom, outside of Gym, (measured 58 inches), Men's Locker Room (measured 58 inches), Women's Locker Room (measured 58 1/4 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | |
| <p>7. Paper towel dispenser exceeds the maximum allowable height of 48 inches from the floor ground in Room 111 (measured 54 inches), Room 111A (measured 64 inches), Room 112 (measured 56 inches), Room 113A (measured 60 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | <p>7. Adjust paper towel dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>8. Soap dispenser exceeds the maximum allowable height of 40 inches from the floor ground in Main Office Right Restroom (measured 54 inches), Room 122 (measured 50 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>8. Adjust soap dispenser height to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>9. Soap dispenser exceeds the maximum allowable height of 48 inches in Room 111 (measured 49 inches), Room 111A (measured 59 inches), Room 112 (measured 49 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | <p>9. Provide paper towel dispenser to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>10. The Men's Locker Room, accessible shower stall, has missing controls. It is important to properly maintain features of facilities that are required to be readily accessible to and usable by individuals with disabilities. (Title II, 28 CFR § 35.133(a))</p> | <p>10. Provide accessible shower controls to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General, Title II, 28 CFR § 35.133(a))</p> |
| <p>11. Mirrors exceed the maximum allowable height of 40 inches above the floor ground in the Men's Second Floor Restroom (measured 51 inches), Women's Second Floor Restroom (measured 51 inches). (ANSI, 5.6 Toilet Rooms, 5.6.4)</p> | <p>11. Adjust mirrors to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors)</p> |

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| <p>12. Women's and Men's Theater Dressing Room Restrooms are not accessible. There are no accessible toilet room stalls (measured 26 inches) that allow access for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>12. Provide accessible water closets and toilet compartments that have 32 inch minimum door width openings. (2010 ADA Standards, 404 Doors, Doorways, and Gates, 404.2.3 Clear Width Chapter 6: Plumbing Elements and Facilities, 603 Toilet and Bathing Rooms, 604 Water Closets and Toilet Compartments)</p> |
| <p>13. Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 108 (measured 45 inches), Room 108A (measured 46 inches), Room 109 (measured 45 inches), Room 110 (measured 45 inches). (ANSI, 5.7 Water Fountains, 5.7.2)</p> | <p>13. Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow)</p> |
| <p>14. Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 111 (measured 45 inches), Room 111A (measured 45 inches), Room 112 (measured 45 inches), Room 113 (measured 46 inches), Room 113A (measured 42 inches). (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow)</p> | <p>14. Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow)</p> |
| <p>15. Counter top heights do not allow for the program areas to be readily accessible for individuals with disabilities in the in the Registrar Area (measured 46 1/2 inches), Student Store (measured 41 1/2 inches), Room 109 (measured 36 1/2 inches), Room 110 (measured 36 inches), Room 115 (measured 36 inches), Room 121 (measured 36 inches), Room 122A (measured 36 1/2 inches), Room 215 (measured 36 inches), Room 216 (measured 36 inches), Room 219 (measured 36 inches), Room 220 (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>15. Provide accessible counters that are 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>16. Counter top height exceeds the maximum allowable height of 34 inches in Room 111A (measured 38 inches), Room 120 (measured 36 1/4 inches). (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> | <p>16. Provide accessible counters that are 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>17. The student workstations/computer tables/lab stations/tables are not accessible to students with disabilities in the Library</p> | <p>17. Provide accessible tables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches</p> |

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| <p>(measured 26 inches at the bottom), Cafeteria/ Commons (measured 18 3/4 inches at the bottom of the bar), Room 108 (measured 24 inches), Room 118 (measured 26 1/2 inches at the bottom), Room 121 (fixed seating), Room 122A (measured 26 3/8 inches at the bottom). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> |
| <p>18. Desk width distance from one desk to another is not accessible in Room 106 (measured 10 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. Aisle width distance is not accessible in Room 118 (measured 29 inches) and in Room 204 A/B aisle width distance (measured 27 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 4.2 Walks)</p> | <p>18. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. Also, provide an accessible desk/workstation in each of the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space)</p> |
| <p>19. Desk width distance from one desk to another does not meet the minimum clearance of 36 inches in Room 112 (measured 26 1/2 inches) and Portables 16-17 (measured 19 1/2 to 20 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route)</p> | <p>19. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space)</p> |
| <p>20. Counters top height exceeds the maximum allowable height of a horizontal working table (28.5 inches to 33.2 inches) and are not accessible to students with disabilities in the Registrar, located in the Counseling Office, (measured 46 1/2 inches), Library (measured 38 3/4 inches), Student Store Counters (measured 41 1/2 inches), Student Store Cash Register Counter (measured 50 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>20. Provide accessible counters/student work stations/lab stations that are 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>21. Counter top height exceed the maximum allowable height of 34 inches in Room 110 (measured 36 inches), Room 111A (measured 38 inches), Room 113 (measured 36 inches), Room 120 (measured 36 1/2 inches). (2010</p> | <p>21. Provide an accessible counter that measures a maximum allowable height of 28 to 34 inches. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor</p> |

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| <p>ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> | <p>and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>22. First Aid Kit is not accessible to and usable for individuals with disabilities in the Small Engines Room 121 (measured 71 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>22. Provide First Aid Kit to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges)</p> |
| <p>23. Fire Blanket handle is not accessible to and usable for individuals with disabilities in the Small Engines Room 121 height (measured 64 1/2 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>23. Provide Fire Blanket handle height to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges)</p> |
| <p>24. AED by Weight Room (measured 7 inches from the wall), paper towel dispenser in Cafeteria/ Commons (measured 7 1/4 inches from the wall), Attendance outside counter (measured 10 3/4 inches from the wall), ASB counter (measured 18 inches from the wall), water fountains by Rooms 101 and 102 (measured 12 1/2 inches and 18 inches from the wall) protrude into walks, halls, corridors, passages, and aisles. Every effort shall be exercise to obviate hazards to individuals with disabilities. (ANSI 5.13)</p> | <p>24. Adjust AED and paper towel dispenser and provide railings or fixtures, e.g. magazine racks, seating cubes, plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that do not protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountains and counters. (2010 ADA Standards, 307 Protruding Objects)</p> |
| <p>25. The Auditorium has a total of 360 seats. There are four ramps that exceed the maximum slope of 1:12. Ramp 1 (measured 12.9 percent to 14.4 percent), Ramp 2 (measured 14 percent to 14.4 percent), Ramp 3 (measured 8.5 percent to 15.8 percent), Ramp 4 (measured 13.4 percent to 15.8 percent). (ANSI, Chapter 5 Buildings, 5.1 Ramps with Gradients, 5.1.1)</p> | <p>25. Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> |
| <p>26. There was no appropriate identification signage with symbols of accessibility on the wall outside of the auditorium. There was no directional signage for the accessible route to the accessible seats, designated aisle seats, to the stage and to the elevator. (1991 ADA Standards, 28 CFR Part 36, 4.30 Signage, 4.30.7 Symbols of Accessibility)</p> | <p>26. Provide directional signage on the outside of the auditorium to the accessible seats, designated aisle seats, to the stage and to the elevator. Both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2)</p> |

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| | Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility |
| 27. Portable 5 and Portable 13 have ramps that exceed the maximum slope of 1:12 or 8.33 percent. Portable 5 ramp has slope ranges from the bottom to the top (measured 8.4 percent to 9.8 percent). Portable 13 has slope ranges from the bottom to the top (measured 8.4 percent to 8.6 percent). (1991 ADA Standards, 28 CFR Part 36, 4.8 Ramps, 4.8.2 Slope and Rise) | 27. Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise) |
| 28. Main/Visitor/Staff Parking Lot has a total of 132 parking spaces. The parking space identification signs were below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. The two accessible (A) parking identification signage near the office entry A1 van accessible (measured 37 inches) and A2 (measured 39 inches). The four accessible (A) parking identification signage near the gym entry A1 van accessible (measured 26 inches), A2 (measured 32 inches), A3 van accessible (measured 28 inches), A4 (measured 24 inches). The three van accessible (A) parking identification signage near the stadium entry A1 (measured 43 inches), A2 (measured 43 inches), A3 (measured 43 inches). Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | 28. Adjust and provide identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.6 Identification) |
| 29. Main/Visitor/Staff Parking Lot has a total of 132 parking spaces. The area near the gym has four accessible parking spaces, two of which are designated as van accessible, and two access aisles. Access Aisle 1 (measured 55 inches wide) which is below the 60 inches wide minimum. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces, 502.3 Access Aisle) | 29. Restripe access aisle to be 60 inches wide minimum serving accessible parking spaces. Access aisles shall adjoin an accessible route. Two parking spaces shall be permitted to share a common access aisle. Parking spaces shall be located on the shortest accessible route from parking to an accessible entrance. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces, 502.3 Access Aisle) |
| 30. Main/Visitor/Staff Parking Lot has a total of 132 parking spaces. The van accessible parking spaces were below the minimum requirement of 132 inches wide. The area near the gym has one van accessible (A) parking space. Van A1 (measured 118 inches). The area near the | 30. Restripe the van accessible parking spaces. Van accessible parking spaces shall be 132 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA |

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| <p>stadium entry has three van accessible parking spaces. Van A1 (measured 124 inches), Van A2 (measured 109 inches), Van A3 (measured 111 inches). (2010 ADA Standards, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle)</p> | <p>Standards, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |
| <p>31. Student Parking Lot has a total of 195 parking spaces. The minimum required of accessible parking spaces is six, with access aisles, and identification signs. There are two accessible parking spaces, one is a van accessible parking space. The parking space identification sign was below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. Van accessible (A) parking identification signage was missing for A1, accessible A2 (measured 15 inches). (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 208.2.4, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> | <p>31. Add four accessible car parking spaces. Car parking spaces shall be 96 inches wide minimum, and shall have four adjacent access aisles of 60 inches wide minimum and extend the full length of the parking space. Also, include four parking space identification signs that shall include the International Symbol of Accessibility. Provide and adjust identification signs to be 60 inches minimum above the ground to the bottom of the sign. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 208.2.4, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> |

RECOMMENDATION

During Bethel School District's onsite review, the following was observed and identified at Bethel High School:

| Identified Issue | Recommended Solution |
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| 1. In the Small Engines Shop the safety striping on the floor is worn and faded around equipment. | 1. Provide appropriately positioned safety striping on the floor. |
| 2. The eyewash station in the Room 120 and Small Engines Shop are not tagged or being tested on a regular basis. | 2. Provide a system in place where the eyewash stations are tested weekly for a minimum of three minutes and documented. |

FACILITIES CHART

| School | Building | Beginning of Construction | Accessibility Standard | Date/Type of Alterations | Accessibility Standard for Alteration |
|---|--|----------------------------------|-------------------------------|-----------------------------------|--|
| <i>Graham-Kapowsin High School</i> | 221000 108 th Ave. E., Graham, WA 98338 | 2005 | 1991 ADA Standards | 2012 Science Classrooms Remodeled | 2010 ADA Standards |
| | Main Office | 2005 | 1991 ADA Standards | N/A | N/A |
| | Counseling Office | 2005 | 1991 ADA Standards | N/A | N/A |
| | Commons | 2005 | 1991 ADA Standards | N/A | N/A |
| | Classrooms | 2005 | 1991 ADA Standards | N/A | N/A |
| | Science Classrooms | 2005 | 1991 ADA Standards | 2012 Remodeled | 2010 ADA Standards |
| | Electronics Shop | 2005 | 1991 ADA Standards | N/A | N/A |
| | Auditorium (415 seats) Required: 6 wheelchair spaces | 2005 | 1991 ADA Standards | N/A | N/A |
| | Library | 2005 | 1991 ADA Standards | N/A | N/A |
| | Gym | 2005 | 1991 ADA Standards | N/A | N/A |
| | Locker Rooms | 2005 | 1991 ADA Standards | N/A | N/A |
| | Small Gym, Second Floor | 2005 | 1991 ADA Standards | N/A | N/A |
| | Weight Room | 2005 | 1991 ADA Standards | N/A | N/A |
| | Portables 1, 2 | 2006 | 1991 ADA Standards | N/A | N/A |
| | Portable 3 | 2006 | 1991 ADA Standards | N/A | N/A |
| | Portable 4 | 2006 | 1991 ADA Standards | N/A | N/A |
| | Portable 5 | 2004 | 1991 ADA Standards | N/A | N/A |
| | Portable 6 | 2004 | 1991 ADA Standards | N/A | N/A |
| Portable 7 | 1999 | 1991 ADA Standards | N/A | N/A | |

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| Portable 8 | 1999 | 1991 ADA Standards | N/A | N/A |
| Portable 9 | 2005 | 1991 ADA Standards | N/A | N/A |
| Portable 10 | 2005 | 1991 ADA Standards | N/A | N/A |
| Portable 11 | 2006 | 1991 ADA Standards | N/A | N/A |
| Portable 12 | 2006 | 1991 ADA Standards | N/A | N/A |
| Portable 13 | 2006 | 1991 ADA Standards | N/A | N/A |
| Portable 14 | 2006 | 1991 ADA Standards | N/A | N/A |
| Portable 15 | 2015 | 2010 ADA Standards | N/A | N/A |
| Portable 16 | 2015 | 2010 ADA Standards | N/A | N/A |
| Portable 17 | 2015 | 2010 ADA Standards | N/A | N/A |
| Portable 18 | 2015 | 2010 ADA Standards | N/A | N/A |
| Main/Visitor/ Student Parking Lot | 2005 | 1991 ADA Standards | Restriped 2018 Every three years or as needed. Signage Added 2016 | 2010 ADA Standards 2010 ADA Standards |
| Staff Parking Lot | 2005 | 1991 ADA Standards | Restriped 2018 Every three years or as needed. Signage Added 2016 | 2010 ADA Standards 2010 ADA Standards |

Note: Uniform Federal Accessibility Standards (UFAS), the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between September 15, 2010 and March 14, 2012. Any corrective action initiated on or after March 15, 2012 must comply with the 2010 ADA Standards.

Graham Kapowsin High School

| Finding | Required Corrective Action |
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| <p>1. Elevator, Car 1, by the Women’s Locker Room hall lanterns are not working. The elevator in the Commons area has a light indicator that only worked on the first floor, and there were no audibles. (1991 ADA Standards, 28 CFR Part 36, 4.10 Elevators, 4.10.4 Hall Lanterns)</p> | <p>1. Provide visible and audible signals at each hoistway and visible signal fixtures that are centered at 72 inches in working order. (2010 ADA Standards, 407 Elevators, 407.2.2 Hall Signals, 407.2.2.1 Visible and Audible Signals)</p> |
| <p>2. Desk width distance from one desk to another does not meet the minimum clearance of 36 inches in Room 159 (measured 25 inches), Room 170 (measured 15 inches), Room 206 (measured 28 inches), Room 208 (measured 29 inches), Room 237 (measured 23 inches), Room 249 (measured 29 inches), Room 256 (measured 29 inches), Room 256 (measured 29 inches), Portable 1 (measured 28 inches), Portable 2 (measured 28 inches). (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route)</p> | <p>2. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> |
| <p>3. Desk width distance from one desk to another does not meet the minimum clearance of 36 inches in Room 112 (measured 26 1/2 inches) and Portable 16-17 (measured 19 1/2 to 20 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route)</p> | <p>3. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space)</p> |
| <p>4. Automatic door opener buttons to the Gym, Room 128, are not operational on both the inside and outside of the Gym. Automatic door opener button is inoperable due to the failure to maintain it, making the area not readily accessible for individuals with disabilities. (1991 ADA Standards, 28 CFR Part 36, 4.13 Doors, A4.13 Doors, 4.14.12 Automatic Doors and Power Assisted Doors, (Title II, 28 CFR § 35.133(a))</p> | <p>4. Provide an operable automatic door opener or provide handles that are operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. Operable parts of such hardware shall be 34 inches minimum and 48 inches maximum above the finish floor or ground. (2010 ADA Standards, 309 Operable Parts, 309.4 Operation, 404 Doors, Doorways, and Gates, and 404.2.7 Door and Gate Hardware, 404.3 Automatic and Power-Assisted Doors and Gates, (Title II, 28 CFR § 35.133(a))</p> |
| <p>5. There was no appropriate identification signage with symbols of accessibility on the wall outside of the Men’s Locker Room (half a</p> | <p>5. Provide signage on the outside of Men’s Locker Room, both visual and tactile characters are required. Pictograms shall</p> |

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| <p>sign and not readable), Women’s First Floor Staff Restroom, Men’s First Floor Staff Restroom, Men’s Restroom across from the Auditorium (no tactile or braille). (1991 ADA Standards, 28 CFR Part 36, 4.30 Signage, 4.30.7 Symbols of Accessibility)</p> | <p>have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility)</p> |
| <p>6. Door opening force exceeds the maximum allowable pressure of five pounds to Room 122 (measured 12 pounds of pressure), Room 122C (measured 13 pounds of pressure), Room 122E (measured 11 pounds of pressure), Room 122H (measured 13 pounds of pressure), Room 140 (measured 12 pounds of pressure), Room 142 (measured 16 pounds of pressure), Room 146 (measured 12 pounds of pressure), Room 151 (measured 15 pounds of pressure), Room 152 (measured 16 pounds of pressure), Room 154 (measured 23 pounds of pressure), Room 155 (measured 16 1/2 pounds of pressure), Stage (measured 16 pounds of pressure), Room 170 (measured 15 pounds of pressure), Room 175 (measured 22 pounds of pressure), Room 176 (measured 15 pounds of pressure), Room 177 (measured 24 pounds of pressure), Room 178 (measured 16 pounds of pressure), Room 179 (measured 17 pounds of pressure), Room 180 (measured 13 pounds of pressure), Room 202 (measured 14 pounds of pressure), Room 203 (measured 12 pounds of pressure), Room 204 (measured 12 pounds of pressure), Room 205 (measured 13 pounds of pressure), Room 206 (measured 12 pounds of pressure), Room 207 (measured 12 pounds of pressure), Room 208 (measured 11 pounds of pressure), Library (measured 15 pounds of pressure), Room 213 (measured 12 pounds of pressure), Room 215 (measured 14 pounds of pressure), Room 217 (measured 12 pounds of pressure), Room 229 (measured 15 pounds of pressure), Room 231 (measured 11 pounds of pressure), Room 232 (measured 14 pounds of pressure), Room 234 (measured 12 pounds of pressure), Room 235 (measured 15 pounds of pressure), Room 236 (measured 14 pounds of pressure), Room 237 (measured 12 pounds of pressure), Room 238 (measured 17</p> | <p>6. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |

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| <p>pounds of pressure), Room 247 (measured 12 pounds of pressure), Room 249 (measured 18 pounds of pressure), Room 250 (measured 14 pounds of pressure), Room 252 (measured 14 pounds of pressure), Room 253 (measured 14 pounds of pressure), Room 254 (measured 14 pounds of pressure), Room 255 (measured 16 pounds of pressure), Room 256 (measured 16 pounds of pressure), Auditorium, two sets of doors, (measured 14 pounds of pressure), Women's Locker Room (measure 17 pounds of pressure), Men's Locker Room (measured 15 pounds of pressure), Women's Restroom by the Gym hallway (measured 20 pounds of pressure), Men's Restroom by the Gym hallway (measured 20 pounds of pressure). (1991 ADA Standards, 28 CFR Part 36, 4.13.11 Door Opening Force)</p> | |
| <p>7. Door opening force exceeds the maximum allowable pressure of five pounds to Room 156 (measured 23 pounds of pressure), Room 157 (measured 24 pounds of pressure), Room 159 (measured 17 pounds of pressure), Room 160 (measured 22 pounds of pressure), Room 165 (measured 14 pounds of pressure), Room 169 (measured 20 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> | <p>7. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |
| <p>8. Sink exceeds the maximum height of 34 inches above the finish floor in Room 140, Demonstration Area, (measured 35 1/2 inches at the bottom and 36 1/4 inches at the top). (1991 ADA Standards, 28 CFR Part 36, 4.24 Sinks, 4.24.2 Height)</p> | <p>8. Provide accessible sink that shall be installed with the front of the higher of the rim or counter surface 34 inches maximum above the finish floor or ground (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height)</p> |
| <p>9. Drinking fountain pressure exceeds the maximum allowable pressure of 5 pounds of pressure in the Art Hallway (measured 15 pounds of pressure), Attendance Area (measured 10 pounds of pressure). (1991 ADA Standards, 28 CFR Part 36, 4.15 Drinking Fountains and Water Coolers, 4.27.4 Operation)</p> | <p>9. Reduce the pounds of pressure for the faucet controls. The force required to activate operable parts shall be 5 pounds maximum. (2010 ADA Standards, 602 Drinking Fountains, 602.3 Operable Parts, 309 Operable Parts, 309.4 Operation).</p> |
| <p>10. Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 159 (measured 56 inches), Room 160 (measured 45 inches), Room 169 (measured 43 1/4 inches). (2010 ADA Standards, 602</p> | <p>10. Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow)</p> |

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| <p>Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow)</p> | |
| <p>11. Emergency shower handle height exceeds the maximum allowable height of 48 inches in Room 154 (measured 53 inches). (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.2.5 Forward Reach)</p> | <p>11. Provide an accessible emergency shower handle with a maximum height of 48 inches. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2)</p> |
| <p>12. Emergency shower handle height exceeds the maximum allowable height of 48 inches in Room 157 (measured 52 inches), Room 158 (measured 53 inches). (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2)</p> | <p>12. Provide an accessible emergency shower handle with a maximum height of 48 inches. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2)</p> |
| <p>13. Soap dispenser exceeds the maximum allowable height of 48 inches in Room 148, has five dispensers, (measured 55 inches). (1991 ADA Standards, 28 CFR Part 36, 4.27 Controls and Operating Mechanisms, 4.27.3 Height, 4.2.5 Forward Reach)</p> | <p>13. Adjust soap dispenser height to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>14. Paper towel dispenser exceeds the maximum allowable height of 48 inches in Room 122E (measured 60 1/2 inches), Room 140 (measured 50 1/2 inches), Room 142 (measured 49 1/2 inches), Room 154 (measured 49 1/2 inches), Student Store (measured 49 inches), Portable 3 (measured 49 inches), Restroom 155 (measured 51 inches), Women's First Floor Staff Restroom (measured 50 inches), Men's First Floor Staff Restroom (measured 50 inches). (1991 ADA Standards, 28 CFR Part 36, 4.27 Controls and Operating Mechanisms, 4.27.3 Height, 4.2.5 Forward Reach)</p> | <p>14. Adjust paper towel dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>15. Paper towel dispenser exceeds the maximum allowable height of 48 inches from the floor ground in Room 156, has six dispensers, (measured 52 inches), Room 157 (measured 63 inches), Room 159 (measured 47 inches), Room 160, has three dispensers, (measured 52 inches), Room 165, has two dispenser, (measured 51 inches) and (measured 52 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | <p>15. Adjust paper towel dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |

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| <p>16. Coat hook height exceeds the maximum allowable height of 48 inches above the floor ground in the Women's Locker Room, accessible stall, (measured 55 1/2 inches), Men's Locker Room, accessible stall, (measured 57 inches), Women's Restroom outside of Gym, accessible stall, (measured 52 1/4 inches), Women's Restroom outside of Gym, ambulatory stall, (measured 63 3/4 inches), Men's Restroom outside of Gym, accessible stall, (measured 54 1/2 inches), Women's Restroom by the Gym hallway, accessible stall, (measured 54 inches), Women's Restroom by the Gym hallway, ambulatory stall, (measured 65 1/2 inches), Men's Restroom by the Gym hallway, accessible stall, (measured 54 inches), Men's Restroom by the Gym hallway, ambulatory stall, (measured 66 inches), Restroom 155 (measured 65 inches), Women's Restroom across from Room 152, accessible stall, (measured 67 inches), Men's Restroom across from the Auditorium, accessible stall, (measured 51 inches). (1991 ADA Standards, 28 CFR Part 36, 4.27 Controls and Operating Mechanisms, 4.27.3 Height, 4.2.5 Forward Reach)</p> | <p>16. Provide coat hooks to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves)</p> |
| <p>17. The drinking fountains in the Art Hallway (measured 12 and 18 inches from the wall), Attendance Area (measured 13 inches from the wall), by Practice Room (measured 19 inches from the wall), Room 122D Area (measured 18 inches from the wall), Women's Locker Room (measured 18 inches from the wall), Men's Locker Room (measured 18 inches from the wall). Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (1991 ADA Standards, 28 CFR Part 36, 4.4 Protruding Objects, 4.4.1 General, 4.4.2 Head Room).</p> | <p>17. Provide railing alongside of the drinking fountains or fixtures, e.g. magazine racks, seating cubes, plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that don't protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects)</p> |
| <p>18. AED located outside of the Gym/Concession Area (measured 8 inches from the wall).</p> | <p>18. Provide railing alongside of the AED or fixtures, e.g. magazine racks, seating cubes,</p> |

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| <p>Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (1991 ADA Standards, 28 CFR Part 36, 4.4 Protruding Objects, 4.4.1 General, 4.4.2 Head Room)</p> | <p>plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that don't protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects)</p> |
| <p>19. Fire extinguisher in the Women's Locker Room (measured 6 3/4 inches from the wall). Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (1991 ADA Standards, 28 CFR Part 36, 4.4 Protruding Objects, 4.4.1 General, 4.4.2 Head Room)</p> | <p>19. Provide railing alongside of the fire extinguisher or fixtures, e.g. magazine racks, seating cubes, plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that don't protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects)</p> |
| <p>20. Weight Room, Room 146, has a 2 1/4 inch lift on 6 platforms and a 3 inch lift on 3 platforms, which exceeds the maximum amount of 1/4 inch change in level. Ground and floor surfaces along accessible routes shall be stable, firm, and slip-resistant. (1991 ADA Standards, 28 CFR Part 36, 4.5 Ground and Floor Surfaces, 4.5.2 Changes in Level)</p> | <p>20. Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled)</p> |
| <p>21. There was no appropriate identification signage with symbols of accessibility on the wall outside of the auditorium. There was no directional signage for the accessible route to the accessible seats, designated aisle seats, to the stage and to the elevator. (1991 ADA Standards, 28 CFR Part 36, 4.30 Signage, 4.30.7 Symbols of Accessibility, 4.3 Accessible Route)</p> | <p>21. Provide signage on the outside of the auditorium to the accessible seats, designated aisle seats, to the stage and to the elevator. Both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility)</p> |
| <p>22. Portable 8 ramp has slope measurements from the bottom of the ramp to the top (ranging from 7 percent to 8.8 percent), Portable 9 has slope measurements from the bottom of the ramp to the top (ranging from</p> | <p>22. Provide accessible ramps with a maximum slope of 8.33 percent. (2010 ADA Standards, 405 Ramps, 4.6 Curb Ramps).</p> |

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| <p>6.6 percent to 8.9 percent), Portable 11 and 12 has slope measurements from the bottom of the ramp to the top (ranging from 7.3 percent to 8.5 percent), Portable 13 and 14 has slope measurements from the bottom of the ramp to the top (ranging from 8.1 percent to 9.2 percent), Portable 15 has slope measurements from the bottom of the ramp to the top (ranging from 7 percent to 8.9 percent), Portable 17 and 18 has a slope measurements from the bottom of the ramp to the top (ranging from 7.3 percent to 8.5 percent), which exceeds the maximum slope of 1:12 (1991 ADA Standards, 28 CFR Part 36, 4.7 Curb Ramps, 4.8 Ramps, 4.8.2 Slope and Rise)</p> | |
| <p>23. Main/Visitor/Student Parking Lot has a total of 381 parking spaces. The parking space identification signs were below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. By the office: Accessible (A) parking identification signage, van accessible A1 (measured 36 inches), A2 (measured 36 inches), van accessible A3 (measured 36 inches), and A4 (measured 36 inches). By the fields: A1 (measured 37 inches), A2 (measured 35 inches), A3 (measured 34 1/2 inches), A4 (missing signage). (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> | <p>23. Adjust and provide identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> |
| <p>24. Main/Visitor/Student Parking Lot, near the office, has two van accessible parking spaces that both (measured 94 inches wide) which is below the minimum width of 132 inches. There are four accessible (A) parking spaces, by the field, and three of them are below the minimum width of 96 inches. A1 (measured 94 inches), A2 (measured 85 inches), A3 (measured 84 Inches. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.2 Vehicle Spaces)</p> | <p>24. Provide car parking spaces that shall be 96 inches wide minimum and van accessible parking spaces that shall be 132 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |

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| <p>25. Staff Parking Lot has a total of 150 parking spaces. The parking space identification signs were below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. Accessible (A) parking identification signage A1 (measured 33 inches), A2 (measured 35 inches), A3 (measured 35 inches), A4 (measured 36 inches), van accessible A5 (measured 35 inches) and A6 (measured 35 inches). (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> | <p>25. Adjust and provide identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> |
| <p>26. Staff Parking Lot has six accessible (A) parking spaces, one of which is van accessible. Five of the six accessible parking spaces are below the minimum width of 96 inches for car parking spaces, of which there are four, and 132 inches for the van accessible parking space. A1 (measured 93 inches), A2 (measured 91 inches), A3 (measured 92 inches), A4 (measured 93 inches), van accessible A5 (measured 94 inches). (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.2 Vehicle Spaces)</p> | <p>26. Provide a van accessible parking space that shall be 132 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |

RECOMMENDATION

During Bethel School District's onsite review, the following was observed and identified at Graham-Kapowsin High School:

| Identified Issue | Recommended Solution |
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| 1. Eyewash station in Room 169 is not being tested for water flow on a regular basis. | 1. Provide a system in place where the eyewash station is tested weekly for a minimum of three minutes and documented. |
| 2. The emergency showers in Room 154, Room 157 and the drinking fountains are not being tested for water flow and pressure on a regular basis. | 2. Provide a system in place where the emergency shower and drinking fountains are tested and documented. |
| 3. The current procedure for when the Otis Care Center answers an emergency call in the school elevator, is only if they receive a second call from the same elevator in 30 minutes. | 3. Consider changing the procedure to having the Otis Care Center answer an emergency call the first time. An individual could be having a stroke or seizure and unable to press the emergency call button a second time. |

COMPARABLE FACILITIES

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female, or disabled students should be located in similar proximity to the associated classrooms, shops or laboratories.

Citations: Title IX (34 CFR § 106.33)
Section 504 (34 CFR § 104.4(b)(ii))
Section 504 (34 CFR § 104.34(c))
Guidelines (VI. A., D.)

Findings: Based on review of materials (including policy for providing aid and services, policies regarding the use of guide dogs and assistive devices, student handbook, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: No action required at this time.

WORK STUDY CO-OP EDUCATION, JOB PLACEMENT AND APPRENTICESHIP TRAINING

An agency not only has the responsibility to provide its services in a nondiscriminatory manner; it also has the responsibility not to foster discrimination by businesses that provide employment, workplace learning sites or apprenticeship training programs. To be a partner in discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, national origin or disability.

Citations: Title IX (34 CFR § 106.38(a))
Guidelines (VII. A., B.)

Findings: Based on review of materials (including review of enrollment data, policies regarding nondiscrimination in program offerings, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: No action required at this time.

EMPLOYMENT

Guideline: Recipients are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

The recipient must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex or disability. The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin sex or disability. Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions to the positions

and make reasonable accommodations for the physical or mental limitations of disabled, qualified applicants, unless it can be demonstrated that such accommodations would impose undue hardship.

Citations: Title IX (34 CFR §§ 106.51-61)
Section 504 (34 CFR § 104.11-14)
Guidelines (VIII. A.-F.)

Findings: Based on review of materials (including employee handbook, employment applications, personnel website, etc.), interviews, and onsite walk-through, no evidence of findings was observed during this onsite review.

Required Action: No action required at this time.

This concludes the civil rights monitoring visit Letter of Findings (LOF). While the foregoing citations will help to shape the district's Voluntary Compliance Plan (VCP), full instructions about the Plan's content are discussed in the opening page of this letter.

Bethel School District is asked to submit a VCP within 90 calendar days from the date of receipt of this letter and no later than October 28, 2019.

Please remember the district's ongoing responsibility to comply with the civil rights laws and the *Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services On the Basis of Race, Color, National Origin, Sex, and Handicap*.

If you need further clarification or technical assistance with corrective action planning to address noncompliance items, please contact me at deifi.stolz@k12.wa.us or (360) 725-6254. Again, thank you for your cooperation and the efforts of your staff in this review.

Sincerely,



Deifi Stolz
Program Supervisor
Methods of Administration
Career and Technical Education
Learning and Teaching Division
Office of Superintendent of Public Instruction

cc:

Ron Mayberry, Career and Technical Education Director
Bethel School District

Christy Rodriguez, Principal
Bethel High School

Matt Yarkosky, Principal
Graham-Kapowsin High School

Michael Christianson, Chief Technology Officer
Bethel School District

Cathie Carlson, Director of Construction and Planning
Bethel School District

David Wells, Facilities Director
Bethel School District

Rebecca Wallace, Executive Director
Career and Technical Education
Office of Superintendent of Public Instruction

Terri Colbert, Perkins Program Specialist
Workforce Training and Education Coordinating Board



SUPERINTENDENT OF PUBLIC INSTRUCTION

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

August 23, 2019

Superintendent Thomas G. Seigel
Bethel School District
516 176th Street E.
Spanaway, WA 98387

Civil Rights Review Letter of Findings (LOF)

Dear Superintendent Seigel:

On June 7, Deifi Stolz, Methods of Administration (MOA) Coordinator, Dan Tedor, Science, Technology, Engineering and Math Program Supervisor, and Debra Durupt, Grants and Innovative Programs Program Supervisor for the Office of Superintendent of Public Instruction (OSPI) conducted an onsite civil rights compliance review of the career and technical education (CTE) programs and support services of Spanaway Lake High School. On June 11, Deifi Stolz, Debra Durupt, Sarah Albertson, Equity and Civil Rights Managing Attorney (observed), and Stacy Wyman, from the Workforce Training Board, conducted an onsite civil rights compliance review of the career and technical education (CTE) programs and support services of Challenger High School. The purpose of the review was to determine the compliance status of the district's CTE programs and facilities with Federal Civil Rights laws.

As explained during the review, and subsequent phone calls and email correspondence, the Letter of Findings (LOF) summarizes the observations and conclusions reached as a result of this onsite visit. It was greatly appreciated to be provided the district's documentation and for having staff members available during the compliance review.

Thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin*;
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex*;
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability*;
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability*;
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

This LOF is a formal follow-up to the exit interviews, which were conducted on June 7 and June 11, 2018. This letter details noncompliance issues and required corrective actions. The purpose of an LOF is threefold:

1. To recommend changes, which, although not violations of Civil Rights laws, would enhance the experience of all students at the Bethel School District;
2. To summarize the specific instances of noncompliance identified during the onsite review; and
3. To provide notice of requirement to the district to submit a final Voluntary Compliance Plan (VCP) to OSPI, **90 calendar days from the date of receipt of this letter and no later than November 22, 2019**. Only the items identified as "Findings" must be addressed. "Recommendations" need not be addressed in the VCP.

The VCP must:

1. List each specific instance of noncompliance identified in the LOF and provide the district's detailed plan of action to correct each finding.
2. Establish and provide a timetable for remediation of each instance of noncompliance, including month and year.
3. For each corrective action, provide to OSPI, as appropriate, documentation, links to website, photographic evidence.
 - a. In the efforts to bring action items into compliance, the subrecipient may request technical assistance from OSPI.
 - b. A follow-up onsite review may be requested by the subrecipient for OSPI to verify the completion of corrective action items.
4. Identify the personnel responsible for implementing each planned activity. The VCP must be signed and dated by the district superintendent.

The following findings are based upon a review of practices and procedures at the Bethel School District, including data and materials submitted, discussion with the staff members compiling the documentation for the review, interviews with administrative and building staff, students, and onsite observations of programs and facilities.

Items of noncompliance are identified below in the same order as the Onsite Civil Rights Compliance Checklist. The statutory authority precedes description of the finding.

ADMINISTRATIVE

In order to comply with United States Department of Education Guideline requirements for career and technical education programs, school districts, and skill centers, must have in place basic procedures regarding federal statutes and implementing departmental regulations: 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, as well as *Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*.

There are four basic administrative requirements:

1. Designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II (Title IX (34 CFR Part 106.8(a)); Section 504 (34 CFR Part 104.7(a)); Title II (28 CFR Part 35.107); Guidelines (IV. O.).
2. Annual public notice of nondiscrimination (Guidelines IV.O.)

3. Continuous notification of nondiscrimination (Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106) and,
4. A grievance procedure that allows students and parents an avenue for dealing with alleged discrimination (Title IX (34 CFR Part 106.8(b)); Section 504 (34 CFR Part 104.7(b)); Title II (28 CFR Part 35.107(b)).

Citations: Title II (28 CFR § 35.106-107)
 Title VI (34 CFR § 100.6(d))
 Title IX (34 CFR § 106.8-9)
 Section 504 (34 CFR § 104.7-8)
 Guidelines (IV. O.)

| Finding | Required Corrective Action |
|---|--|
| <p>1. The Bethel School District did not publish, post or disseminate the annual nondiscrimination statement. The statement was not published in the Bethel Pride or in the appropriate language for communities of national origin with limited English proficiency. As identified, there is a national origin community of Spanish speaking individuals within district boundaries.</p> <p>(Guidelines IV. O.; Title VI (34 CFR § 100.6(d))</p> | <p>1. The Annual Notification must be published and disseminated prior to the beginning of school and include a brief summary of CTE program offerings, admissions criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. The statement must also include language indicating lack of English language proficiency will not be a barrier to admission and participation in career and technical education programs.</p> <p>As identified, the national origin community of Spanish speaking individuals in the Bethel School District should receive this notification in similar fashion within district boundaries. All other identified communities (if there are others so designated) should receive this notification in their language of national origin as required.</p> <p>The district is to place the Annual Notification in the Bethel Pride, on the district's main website homepage, and on each high school and middle school website homepages.</p> |

2. Inconsistent use of the comprehensive continuous nondiscrimination statement (based on a review of materials including district newsletters, bulletins, press releases, brochures, handbooks, school calendars, course catalogs, admissions materials, job announcements, district and high school websites, etc.).

There are various versions of what should be the consistent version of the comprehensive continuous nondiscrimination statement.

The Bethel School District High School Course Catalog 2017-18 School Year did not include the protected class of *sex*.

The Bethel School District's Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation did not include the protected class of *sex* nor include person(s) designated to handle inquiries, phone numbers, or addresses.

Bethel High School's The Career & Technical Education Marketing Sales & Service brochure did not include person(s) designated to handle inquiries, phone numbers, or addresses. The Bethel School District's Student Calendar 2017-18 and the Bethel School District's Career & College Readiness Career & Technical Education Community Report 2016-17 did not include the *address* for the Title IX Officer, Section 504 Coordinator, Executive Director for Special Education, Executive Director for Human Resources, Civil Rights Coordinator, and Director of Equity and Achievement.

The Bethel School District's Bullying brochure, did not include the *address* for the Assistant Director of Human Resources or the Executive Director of Special Services.

The Bethel School District's Family and Student Access brochure, Bethel School

2. The district should include the consistent comprehensive continuous nondiscrimination statement in the Bethel School District High School Course Catalog, Bethel School District's Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation, Bethel School District's Student Calendar, Bethel School District's Career & College Readiness Career & Technical Education Community Report, Bethel School District's Bullying brochure, Bethel School District's Family and Student Access brochure, Bethel School District's Homeless brochure, Bethel Pride, Employee Safety & Health Handbook, CTE Insider Career & College Readiness Newsletter, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, Intro to Lifetime Fitness, High School and Beyond Plan form, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form, CTE recruitment materials, flyers, brochures, publications, press releases, as well as in an obvious location on each school website, just like it is on the district's website.

District's Homeless brochure, Bethel Pride, August 2015, Bethel Pride, April 2016, Bethel Pride, November/December 2017, Bethel Pride, January/February 2018, Bethel School District's Career & College Readiness Career & Technical Education, May 2017 did not include the *address* for the Title IX Officer, Section 504 Coordinator, and Compliance Coordinator for Civil Rights Laws.

The comprehensive continuous nondiscrimination statement was not included in the following Bethel School District items:

CTE Insider Career & College Readiness Newsletter, November 2017, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, High School and Beyond Plan form, Career and Technical Education Work Based Learning-Employed (CTW2017) Syllabus, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form.

Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106).

Recommendations:

1. A sample annual nondiscrimination notice may be found at the OSPI website: <http://www.k12.wa.us/CareerTechEd/CivilRights.aspx>.
<http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx>
2. Sample comprehensive continuous nondiscrimination notices may be found at the Office for Civil Rights website: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. For state nondiscrimination requirements, visit <http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx>.

RECRUITMENT

Recipients must conduct their recruitment activities in a manner that does not exclude or limit opportunities on the basis of race, color, national origin, sex or disability. Recruitment material descriptions of career and occupational opportunities are not to be limited on the basis of race, color, national origin, sex or disability. To the extent possible, recruiting teams should represent persons of different races, national origins, sexes and disabilities. Recipients must ensure that career counselors can effectively communicate with students with disabilities and students with limited English proficiency. Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration. If a recipient’s service area contains a community with persons of limited English proficiency, information must be available and distributed to that community in its language.

Citations: Title IX (34 CFR § 106.23(a)(b))
Guidelines (V. A., C., E.)

| Finding | Required Corrective Action |
|--|---|
| <p>1. Based on review of recruitment materials (including course catalog, brochures and marketing materials, staff demographics, plans for the provision of services, samples of materials in other languages, etc.), interviews, and onsite walk-through, the district’s service area contains a national origin community of Spanish speaking individuals in Bethel School District with limited English language skills.</p> <p>There were limited publications for Household Application for Free and Reduced-Price Meals, National School Lunch Program/School Breakfast Program Letter to Household (Public Schools), Notice of Eligibility For Free or Reduced-Price Meals, FAFSA, and Emergency Contact published in Spanish. There are publications available in other languages digitally in the Main Office, Career Center and Guidance and Counseling Offices. The majority of the publications were in English.</p> <p>Guidelines (V. E.)</p> | <p>1. Provide and distribute recruitment promotional materials, brochures, pamphlets, scholarships, internships, apprenticeships, industry-based certification and licensure information, transcript requests, course catalog, and other current promotional materials published in Spanish minimally in the Main Office and Career Center and Guidance and Counseling Offices.</p> |

ADMISSIONS

Admissions policies, procedures, and criteria may not exclude students from CTE programs on the basis of race, color, national origin, disability, or sex, including pregnancy, childbirth, and termination of pregnancy. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex or persons with disabilities, the criteria should be validated as essential to success in the program. Pre-admissions inquiries about marital status must be avoided or from applying any rule concerning the parental status of a student or applicant that discriminates on the basis of sex.

Citations: Title IV (34 CFR § 100.3(a) and (b)(1)(v))
Section 504 (34 CFR § 104.4(a)(b))
Guidelines (IV. A., F., K., L., N.)

Findings: Based on review of materials (including admissions policies, admission applications, enrollment data, etc.), interviews, and onsite walk-through, no evidence of findings was observed during this onsite review. Disproportionality within programs, in regards to race, was evaluated and analyzed based on community, school, and program enrollment demographic data. Interviews with the leadership team, administrators, and students did not indicate that the disproportionality was the result of discrimination.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

STUDENT FINANCIAL ASSISTANCE

Financial assistance is available to all students regardless of sex, race, color, national origin or disability. Education agencies shall not limit honors, awards and scholarships to a group on the basis of race, color, national origin, sex or disability unless such targeting is done to provide opportunities to members of a group that has traditionally not been represented. Outside agencies that provide awards are to be notified of the agency's nondiscrimination policy. A school district may administer or assist in the administration of scholarships or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, and similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarship on the basis of sex, race, national origin or disability.

Because financial aid is often the stumbling block for those historically underrepresented in postsecondary education, secondary schools should assist all students preparing for postsecondary experiences, including disadvantaged students, to become aware of this requirement. If a recipient's service area contains a community of national origin minority persons with limited English language skills, material and information used to notify students of financial aid opportunities must be disseminated to that community in its language.

Citations: Title VI (34 CFR §§ 100.3(a)(b))
Title IX (34 CFR § 106.37)
Section 504 (34 CFR § 104.4(a)(b))
Guidelines (VI. B.)

Findings: Based on review of materials (including financial aid data, materials for students regarding financial aid, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

CAREER COUNSELING PROGRAM

Counseling programs may not include steering of students toward particular courses or programs that are traditional for the student’s race, color, national origin, English language proficiency, sex or disability. Services and materials related to career counseling and recruitment must be free of discrimination and stereotyping in language, content and graphic illustration. If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

Citations: Title VI (34 CFR §§ 100.3(a)(b))
 Title IX (34 CFR § 106.36)
 Section 504 (34 CFR §§ 104.4(a)(b), 104.37(b))
 Guidelines (V. A., B., D.)

Findings: Based on review of materials (including promotional and recruitment materials, enrollment demographics and admission policies), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

RECOMMENDATION

During Bethel School District’s onsite review, the following was observed and identified at Spanaway Lake High School:

| Identified Issue | Recommended Solution |
|--|--|
| <p>1. The school counselors have a full case load and are doing their best to keep their respective students informed of graduation requirements and provide individualized student academic planning and responsive services. They also advocate for students at 504 and IEP meetings and school attendance review boards. They provide language testing and counseling to students who are in crisis, tardy or absent, homeless, and make CPS referrals. They provide teachers with suggestions for effective classroom management. They work with parents and</p> | <p>1. From interviews with counselors, staff and students, there is a need to provide additional supports for English Language Learners and their families.</p> <p>There are school district personnel assigned to help with interpretive services during counseling appointments, Becca meetings, etc. At times, students are asked to be interpreters with guardians or parents.</p> <p>Provide additional English Language Specialists and trained interpreters to assist</p> |

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| <p>teachers to support students in the classroom. They assist with SAT, PSAT, Advisory and the Master Schedule. They analyze disaggregated data, grade-point averages in relationship to achievement, interpret student records, and ensure student records are maintained according to state and federal requirements.</p> | <p>students, guardians and parents navigate the educational system successfully.</p> |
|---|--|

SERVICES FOR STUDENTS WITH DISABILITIES

A qualified person with a disability may not, on the basis of disability, be excluded from, denied benefits of, or subjected to discrimination in any course, program or activity. A recipient may not restrict access for students with disabilities to schools, programs, services and activities. Section 504 and ADA, Title II are based upon the premise that students with disabilities will be integrated with their non-disabled peers to the extent possible.

Citations: Title II (28 CFR 35.130)
 Section 504 (34 CFR §§ 104.4(a), 104.33-36)
 Guidelines (IV. N.)
 Guidelines (VI. A.)

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

RECOMMENDATION

During Bethel School District’s onsite review, the following was observed and identified at Spanaway Lake High School:

| Identified Issue | Recommended Solution |
|---|---|
| <p>1. The Special Education Director indicated that students with disabilities are successful at Bethel School District. However, some students with disabilities do not have transportation from their serving district.</p> | <p>1. District personnel to have discussions with the respective families of students with disabilities and the serving district on how to best meet the needs of the students. Set up an Action Plan that is agreeable to all parties.</p> <p>District has a transportation policy in place that complies with state law and regulation.</p> |

ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its program or service due to inaccessibility of facilities, according to Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990. All agencies are responsible for compliance with Section 504 and Title II. Applicable accessibility standards are determined by the date the facility was constructed or last altered. In general, in the case of a facility's alteration, only the altered portion is affected. The standards are as follows (ANSI, UFAS, 1991 ADA Standards, and 2010 ADA Standards):

- Existing facilities/Section 504 (34 CFR, § 104.22 and 28 CFR § 35.150) – construction or alteration initiated before 6/4/1977. Programs or activities offered in existing facilities must, when viewed in their entirety, be readily accessible to persons with disabilities.
- New construction/Section 504 (34 CFR § 104.23) – construction or alteration initiated between 6/4/1977 and 1/17/1991. Facilities follow American National Standards Institute, Inc. (ANSI) A117.1-1961 (R1971).
- New construction/Section 504 (34 CFR § 104.23) – construction or alteration initiated on or after 1/18/1991 and before 1/27/1992. Facilities follow the Uniform Federal Accessibility Standards (UFAS) Appendix A to 41 CFR subparts 101-19.6.
- New construction/Americans with Disabilities Act Title II (Appendix A of 28 CFR Part 36)
 - For construction or alteration initiated on or after 1/27/1992 facilities followed Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADA Standards)¹ Appendix A of 28 CFR Part 36, or may have elected to follow UFAS Appendix A to 41 CFR subpart 101.
 - For construction or alteration initiated on or after 3/15/2012 facilities follow the 2010 ADA Standards.² For construction or alterations initiated between 1/27/1992 and 3/15/2012, the UFAS, the 1991 ADA Standards (without the elevator exemption) or the 2010 ADA Standards may be used. Only one standard may be used for each building or alteration.
 - The UFAS, the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between 9/15/2010 and 3/15/2012.

Citations: Title II (28 CFR §§ 35.133, 35.149-151)
Section 504 (34 CFR § 104.21-23)
Guidelines (IV. N.)

All violations are noted below. Where no violation is noted, no evidence of findings was observed during this onsite review. Bethel School District facilities were examined for accessibility, based on the applicable standards for construction and alteration:

- Parking: Based on standards for slope, sufficient spaces, appropriate space sizes, and correct signage.
- Signage: Based on standards for signage, buildings, facilities and accessible passageways.
- Entrances and Exits: based on standards for thresholds, force required to open, walkways, clearance, handle requirements, etc.
- Ramps: Based on standards for appropriate slopes, with handrails.

¹ Note: There are two sets of ADA Standards: one that was issued in 1991 and a second issued in 2010.

² The 2010 ADA Standards are available at:

<http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf>

- Interior Doors: Based on standards for operable door handles, door clearances, automatic openers (where available), and force required to open.
- Accessible Route: Based on standards for hallway displays, grade changes, accessible aisles, elevator requirements, carpeting, ramps, stairs, etc.
- Services: Based on standards for services regarding water fountains, fire alarm systems, evacuation plans, restricted areas, etc.
- Student Lockers: Based on standards for student lockers.
- Ramps: Based on standards for ramps, including surface, grade, railing, length, etc.
- Elevators: Based on standards for elevator accessibility.
- Telephones: Based on standards for telephones.
- Restrooms: Based on standards for unisex, female and male-identified restrooms, including signage, sinks, mirrors, pipes, dispensers, reach, stalls, doors, etc.
- Counselor Offices: Based on the standards for counselor offices, including counter height.
- Library: Based on the standards for libraries, including table height, aisles, stack height, service counters, computer stations, etc.
- Assembly Area: Based on the standards for assembly areas.
- Career Centers: Based on the standards for career centers, including location, aisles, workstations, etc.
- Classrooms: Based on the standards for classrooms, including aisles, workstations, dispensers, eyewash stations, doors, sinks, etc.

FACILITIES CHART

| School | Building | Beginning of Construction | Accessibility Standard | Date/Type of Alterations | Accessibility Standard for Alteration |
|----------------------------------|--|---------------------------|--|--|---------------------------------------|
| Spanaway Lake High School | 1305 168 th Street E., Spanaway, WA 98387 | 1981 | American National Standards Institute (ANSI) | See details below. Total remodel and 20,000 square foot addition. The addition was the kitchen and commons area, including circulation space. | See details below. |
| | Main Office | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Attendance Office | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Guidance and Counseling Office | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Career Center | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Health Room | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | SPED Classrooms/ Office | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Cafeteria | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Commons | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Library | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Auditorium | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Main Gym | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Small Gym | 1981 | ANSI | 2010 | 2010 ADA Standards |
| | Boys and Girls Locker Rooms | 1981 | ANSI | 2010 | 2010 ADA Standards |

| | | | | |
|---|------|--------------------|--|--|
| Weight Room | 1981 | ANSI | 2010 | 2010 ADA Standards |
| Choir Room | 1981 | ANSI | 2010 | 2010 ADA Standards |
| Band and Practice Rooms | 1981 | ANSI | 2010 | 2010 ADA Standards |
| Classrooms | 1981 | ANSI | 2010 | 2010 ADA Standards |
| ROTC Classrooms | 1981 | ANSI | 2010 | 2010 ADA Standards |
| ASB Office | 1981 | ANSI | 2010 | 2010 ADA Standards |
| 300 Building | 1981 | ANSI | 2010 | 2010 ADA Standards |
| Portable 1 | 2000 | 1991 ADA Standards | N/A | N/A |
| Portable 2 | 2002 | 1991 ADA Standards | N/A | N/A |
| Portable 3 | 2000 | 1991 ADA Standards | N/A | N/A |
| Greenhouse | 2000 | 1991 ADA Standards | N/A | N/A |
| Front of Building/ Staff Parking Lot | 1981 | ANSI | Repaved 2010 Signage Added Restriped 2016 Restriped every three years or as needed. | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |
| Student Parking Lot 2 | 1981 | ANSI | Repaved 2010 Signage Added 2010 Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |

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|--|------------------------------------|------|------|---|--|
| | Tennis Court and Field Parking Lot | 1981 | ANSI | Resealed 2010 Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards 2010 ADA Standards |
| | Back Portable Parking Lot | 1981 | ANSI | Repaved 2010 Signage Added 2010 Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |
| | Staff Parking Lot 1 | 1981 | ANSI | Repaved 2010 Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards 2010 ADA Standards |
| | Staff Parking Lot 2 | 1981 | ANSI | Repaved 2010 Signage Added 2010 Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |
| | Staff Parking Lot 3 | 1981 | ANSI | Repaved 2010 Signage Added 2010 | 2010 ADA Standards 2010 ADA Standards |

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|--|----------------------|------|------|---|--|
| | | | | Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards |
| | Bus Loop Parking Lot | 1981 | ANSI | Repaved 2008 Restriped 2017 Restriped every three years or as needed. | 1991 ADA Standards 2010 ADA Standards |

Note: Uniform Federal Accessibility Standards (UFAS), the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between September 15, 2010 and March 14, 2012. Any corrective action initiated on or after March 15, 2012 must comply with the 2010 ADA Standards.

Spanaway Lake High School

| Finding | Required Corrective Action |
|---|--|
| <p>1. Door opening force exceeds the maximum allowable pressure of five pounds in the Main Office (measured 9 pounds of pressure), Women’s Locker Room (measured 12 pounds of pressure), Men’s Locker Room (measured 12 pounds of pressure), Gym (measured 10 pounds of pressure), Weight Room (measured 12 pounds of pressure), Auditorium, Door 1 (measured 11 pounds of pressure), Door 2 (measured 12 pounds of pressure), Women’s/ Transgender Restroom in Auditorium Hallway next to Band (measured 12 pounds of pressure), Men’s Restroom in Auditorium Hallway next to Band (measured 12 pounds of pressure), Room 104 (measured 12 pounds of pressure), Room 105 (measured 10 pounds of pressure), Room 106 (measured 14 pounds of pressure), Room 107 (measured 8 pounds of pressure), Room 108 (measured 10 pounds of pressure), Room 110 (measured 10 pounds of pressure), Room 111 (measured 11 pounds of pressure), Room 112 (measured 10 pounds of pressure), Room 113 (measured 12 pounds of pressure), Room 114 (measured 10 pounds of pressure), Room 115 (measured 10 pounds of pressure), Room 117 (measured 18 pounds of pressure), Room 119 (measures 15 pounds of pressure), Room 120 (measured 15 pounds of pressure), Room 122 (measured 14 pounds of pressure), Room 123 (measured 14 pounds of pressure), Room 124 (measured 14 pounds of pressure), Room 125 (measured 16 pounds of pressure), Room 127 (measured 22 pounds of pressure), Room 131 (measured 12 pounds of pressure), Room 132 (measured 11 pounds of pressure), Room 133 (measured 10 pounds of pressure), Room 134A (measured 11 pounds of pressure), Restroom across from Room 135 (measured 11 pounds of pressure), Room 201 (measured 22 pounds of pressure), Room 202 (measured 11 pounds of pressure), Room 202A (measured 11</p> | <p>1. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |

pounds of pressure), Room 203 (measured 14 pounds of pressure), Room 203A (measured 12 pounds of pressure), Room 204 (measured 25 pounds of pressure), Room 205 (measured 9 pounds of pressure), Room 206 (measured 11 pounds of pressure), Room 207 (measured 13 pounds of pressure), Room 208 (measured 13 pounds of pressure), Room 209 (measured 24 pounds of pressure), Room 210 (measured 14 pounds of pressure), Room 211 (measured 10 pounds of pressure), Room 211A (measured 10 pounds of pressure), Room 212 (measured 14 pounds of pressure), Room 214 (measured 14 pounds of pressure), Room 215 (measured 11 pounds of pressure), Room 216 (measured 17 pounds of pressure), Room 217 (measured 20 pounds of pressure), Room 218 (measured 17 pounds of pressure), Room 219 (measured 18 pounds of pressure), Room 220 (measured 12 pounds of pressure), Room 221 (measured 15 pounds of pressure), Room 222 (measured 15 pounds of pressure), Room 222A (measured 12 pounds of pressure), Room 223 (measured 14 pounds of pressure), Room 224 (measured 11 pounds of pressure), Room 225 (measured 15 pounds of pressure), Room 226 (measured 15 pounds of pressure), Room 301 (measured 14 pounds of pressure), Room 302 (measured 14 pounds of pressure), Room 306 (measured 15 pounds of pressure), Room 307 (measured 16 pounds of pressure), Room 309 (measured 14 pounds of pressure), Room 310 (measured 16 pounds of pressure), Room 311 (measured 17 pounds of pressure), Room 312 (measured 15 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)

2. The force required to activate the operable parts for the drinking fountain controls exceeds the maximum allowable pressure of five pounds by the Auditorium (measured 7 pounds of pressure), Small Gym (measured 6 pounds of pressure), Room 105, low fountain (measured 6 pounds of pressure), high fountain (measured 8 pounds of pressure), outside of Room 120 (measured 8 pounds of

2. Reduce the pounds of pressure for the faucet controls. The force required to activate operable parts with one hand, not requiring tight grasping, pinching, or twisting of the wrist, shall be 5 pounds maximum. (2010 ADA Standards, 602 Drinking Fountains, 602.3 Operable Parts, 309 Operable Parts, 309.4 Operation)

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| <p>pressure), in hallway by Room 222A, low fountain (measured 20 pounds of pressure), high fountain (measured 11 pounds of pressure), outside of Room 301, low fountain measured (15 pounds of pressure), high fountain (measured (15 pounds of pressure). (2010 ADA Standards, 602 Drinking Fountains, 602.3 Operable Parts, 309 Operable Parts, 309.4 Operation)</p> | |
| <p>3. Electronically controlled/automatic faucet did not meet the minimum requirement of remaining open for at least 10 seconds in Restroom near the Counselor Offices, Sink 1, Hot (4 seconds), Cold (measured 4 seconds). (2010 ADA Standards, 606 Lavatories and Sinks, 606.4 Faucets, 309 Operable Parts)</p> | <p>3. Adjust hand-operating metering faucet to remain open for 10 seconds minimum. Controls for faucets shall comply with 309. (2010 ADA Standards, 606 Lavatories and Sinks, 606.4 Faucets, 309 Operable Parts)</p> |
| <p>4. Exposed drain pipes under sinks were located in the Women's Locker Room, Room 120, Room 301, Room 306, Room 311, Room 312. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces)</p> | <p>4. Insulate exposed pipes under lavatories and sinks to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces)</p> |
| <p>5. Paper towel dispenser exceeds the maximum allowable reach range height of 48 inches in Main Office Restroom (measured 50 1/2 inches), Restroom near the Counselor Offices (measured 51 inches), Women's Restroom across from the Gym (measured 50 inches), Women's/Transgender Restroom in Auditorium Hallway next to Band (measured 40 3/4 inches), Men's Restroom in Auditorium Hallway next to Band (measured 50 inches), Women's Restroom near the Security Office, Room 143, (measured 49 inches), Room 104A (measured 49 1/2 inches), Room 105 (measured 51 1/4 inches), Room 119 (measures 57 1/2 inches), Room 120, three sink areas, (ranges measured 50-55 1/4 inches), Room 125 (measured 59 inches), Room 127, six dispensers (measured 58 inches), Room 128 (measured 53 inches), Weight Room (measured 62 inches), Room 141 (measured 50 inches), Room 202A, Women's Restroom, Dispenser 1 (measured 50 inches), Dispenser 2 (measured 67 inches), Room 202A, Men's Restroom, (measured 50 inches), Room 301 (measured 54 inches), Women's Restroom outside of Room 310</p> | <p>5. Adjust paper towel dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |

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| <p>(measured 49 inches), Men's Restroom outside of Room 310 (measured 50 inches), Room 307 (measured 53 inches), Room 312 (measured 62 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | |
| <p>6. Soap dispenser height exceeds the maximum allowable reach range height of 48 inches in Women's Locker Room (measured 51 1/4 inches), Room 120, four sink areas, (measured 58 inches), Room 127, six dispensers (measured 52 inches), Weight Room (measured 50 1/2 inches), Room 128 (measured 50 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | <p>6. Adjust soap dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>7. Toilet seat covers exceed the maximum reach range height of 48 inches in the Restroom by Room 310 (measured 55 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General).</p> | <p>7. Adjust toilet seat cover height to be located within the reach ranges specified in 308. Locate the toilet seat cover so it is conveniently usable, typically 40-48 inches, in the restroom (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General).</p> |
| <p>8. Mirror exceeds the maximum height of 40 inches above the floor ground to the bottom edge of the reflecting surface in Room 141 (measured 41 3/4 inches), Women's Restroom by Room 143 (measured 42 1/2 inches), Restroom by Room 310 (measured 44 inches). (2010 ADA Standards, 603.3 Mirrors)</p> | <p>8. Adjust mirror to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors)</p> |
| <p>9. Emergency fire blanket height exceeds the maximum allowable reach range height of 48 inches in Room 120 (measured 63 1/4 inches), Room 122, on top shelf, (measured 67 1/4 inches), Room 124 (measured 73 1/2 inches), Room 128 (measured 60 1/2 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | <p>9. Adjust fire blanket height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>10. Coat hook height exceeds the maximum allowable height of 48 inches above the floor ground in the Women's Restroom outside of Room 301 (measured 66 inches). (2010 ADA Standards, 308 Reach Ranges, Water Closets)</p> | <p>10. Provide coat hook to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet)</p> |

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| and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) | Compartments, 604.8.3 Coat Hooks and Shelves) |
| 11. There was no appropriate identification signage with braille on the wall outside of Room 213. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters) | 11. Provide signage on the outside Room 213, both visual and tactile characters are required. Raised characters shall be duplicated in braille complying with 703.3. Characters shall be uppercase, 5/8 inch minimum height and 2 inches maximum based on the height of the uppercase letter "I". (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters) |
| 12. There is no portable showerhead (measured 71 1/2 inches) in the accessible shower stall in the Women's Locker Room. (2010 ADA Standards, 608.5 Controls, 308 Reach Ranges, 309 Operable Parts) | 12. Provide accessible shower controls that are no higher than 48 inches above the floor ground. (2010 ADA Standards, 608.5 Controls, 308 Reach Ranges, 309 Operable Parts) |
| 13. Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 120 (measured 42 1/2 inches), Room 122 (measured 42 1/4 inches), tag with no dates, Room 125 (measured 39 inches), Room 127 (measured 43 inches), Room 128 (measured 43 inches), Room 306 (measured 42 inches), Room 307 (measured 42 inches), Room 312 (measured 42 inches). (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) | 13. Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) |
| 14. Emergency shower handle exceeds the maximum allowable reach range height of 48 inches in Room 122 (measured 68 1/2 inches), Room 125 (measured 68 inches), Room 127 (measured 62 1/2 inches), Room 128 (measured 68 3/4 inches), Room 301 (measured 68 inches), Room 306 (measured 69 inches). (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2) | 14. Provide an accessible emergency shower handle with a maximum height of 48 inches. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2) |
| 15. Sink/counter exceeds the maximum height of 34 inches above the finish floor in Room 309 (measured 36 inches at the top). (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height) | 15. Provide accessible sink that shall be installed with the front of the higher of the rim or counter surface 34 inches maximum above the finish floor or ground (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height) |
| 16. Lab station/counter top height exceeds the maximum allowable height of 34 inches in Room 306 (measured 39 inches), Room 312 (measured 38 inches). (2010 ADA Standards, | 16. Provide an accessible counter that measures a maximum allowable height of 28 to 34 inches. (2010 ADA Standards, 902 Dining |

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| <p>902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> | <p>Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>17. Student workstations/worktables, desks, lab station heights don't allow for proper knee clearance of a least 27 inches high, 30 inches wide, and 19 inches deep, and need to be at an accessible height of 28 inches minimum and 34 inches maximum above the floor in Room 100C (measured 26 3/4 inches at the bottom and 28 inches at the top), Room 107 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 108 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 110 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 111 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 112 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 113 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 114 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 115 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 116 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 117 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 119 (measured 26 inches at the bottom and 29 inches at the top), Room 120 (measured 26 inches at the bottom and 29 1/8 inches at the top), Room 121 (measured 26 inches at the bottom and 29 inches at the top), Room 126 (measured 26 inches at the bottom and 29 inches at the top), 128 (measured 26 inches at the bottom and 29 1/8 inches at the top), Room 128 (measured 26 inches at the bottom and 29 1/8 inches at the top), Room 131 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 132 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 135 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 139 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 140 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 141</p> | <p>17. Provide accessible student workstations/ work tables/computer tables/lab stations providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> |

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| <p>(measured 26 1/2 inches at the bottom and 29 inches at the top). (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> | |
| <p>18. Desk layout, desk width distance from one desk to another and aisles are not accessible in Room 106 (measured 26 inches), Room 107 (measured 31 inches), Room 110 (measured 29 inches) Room 114 (ranges measured 11-23 inches), Room 115 (ranges measured 20 3/4-24 inches), Room 116 (measured 20 inches), Room 120, in the front of the room, (measured 30 inches), Room 142 (ranges measured 19 3/4 inches near metal book structure to 27 inches), Room 217 (ranges measured 30-39 inches), Room 223 (measured 27 inches). (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> | <p>18. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> |
| <p>19. AED located by Heritage Hall and the Library (measured 8 1/4 inches from the wall, 51 1/2 inches at the bottom, 68 3/4 inches at the top); AED located in the Gym (measured 7 1/2 inches from the wall, 36 1/2 inches to the bottom, 63 3/4 inches to the top); Control panel in the Gym (measured 7 1/2 inches from the wall, 43 7/8 inches to the bottom, 64 inches to the top); Fire extinguisher in the Gym (measured 7 1/2 inches from the wall, 36 3/4 inches to the bottom, 63 3/4 inches to the top); Fire alarm cage in the Small Gym (measured 6 1/2 inches from the wall, 75 1/8 inches to the bottom, 82 1/4 inches at the top); Fire extinguisher outside the Men's Locker Room (measured 7 1/2 inches from the wall, 36 1/4 inches to the bottom, 63 3/4 inches to the top); Fire extinguisher outside the Women's Locker Room (measured 7 1/2 inches from the wall, 36 1/4 inches to the bottom, 63 3/4 inches to the top). Objects projecting from walls with their</p> | <p>19. Provide railing alongside of the AED, fire extinguisher, or fixtures, e.g. magazine racks, seating cubes, plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that do not protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects)</p> |

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| <p>leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (2010 ADA Standards, 307 Protruding Objects)</p> | |
| <p>20. Weight Room, has a 3-inch change in level at three weight stations, which exceeds the maximum amount of a 1/2 inch vertical change in level. Ground and floor surfaces along accessible routes shall be stable, firm, and slip-resistant. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled)</p> | <p>20. Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled)</p> |
| <p>21. Auditorium has a total of 328 seats. Three platform areas are designated as wheelchair seating. There is signage indicating accessible seating, however, the seats are not accessible. The minimum requirement is six wheelchair spaces. There are no designated companion seats equivalent in size, quality, comfort, and amenities to the seating in the immediate area. (2010 ADA Standards, 221 Assembly Areas, 221.3 Companion Seats, 703 Signs, 802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats, 802.3 Companion Seats)</p> | <p>21. Provide wheelchair spaces and companion seats that shall be located on an accessible route that also serves as means of emergency egress, and designated aisle seats, identified with a sign or marker, with appropriate lines of sight. The minimum number of required wheelchair spaces is six and the minimum required companion seats is six. Provide appropriate directional signage with the International Symbol for Accessibility indicating where the designated accessible seating is located and in the designated accessible seating areas. (2010 ADA Standards, 221 Assembly Areas, 221.3 Companion Seats, 703 Signs, 802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats, 802.3 Companion Seats)</p> |
| <p>22. Auditorium ramps exceed the maximum slope of 1:12 or 8.33 percent. Ramp 1 had an incline slope of 27.5 at the beginning of the ramp to the stage. Ramp 2, left of stage, had incline slope ranges from 12.1 percent to 14.2 percent. Ramp 2, right of stage, had incline slope ranges from 13.1 percent to 16.9 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> | <p>22. Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> |
| <p>23. Ramp to the Shop, Room 301, exceeds the maximum slope of 1:12 or 8.33 percent. Slope ranges from 6.3 percent to 9.2 percent. (2010</p> | <p>23. Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> |

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| <p>ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> | |
| <p>24. Front of School/Student Parking Lot 1 has a total of 126 parking spaces. The total number of accessible parking spaces is three, one of which is van accessible. The required number of accessible parking is five. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> | <p>24. Provide two additional accessible parking spaces. Car parking spaces shall be 96 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |
| <p>25. Front of School/Student Parking Lot 1 has three designated accessible (A) parking spaces and two access aisles. Accessible parking space width for A1 (measured 91 inches) and A2 (measured 92 inches) which is below the minimum required width of 96 inches. Access aisle 1 (measured 56 inches), which is below the minimum required width of 60 inches, is between accessible parking spaces A1 and A2. Van accessible parking space width for A3 (measured 102 inches) which is under the minimum required width of 132 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> | <p>25. Restripe the parking lot where the accessible parking spaces are located to include two additional access aisles. Car parking spaces shall be 96 inches wide minimum and van parking spaces shall be 132 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> |
| <p>26. Front of School/Student Parking Lot 1 has three signs identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 53 1/2 inches), Sign 2 (measured 57 1/2 inches), and Sign 3, van accessible, (measured 59 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> | <p>26. Provide two additional signs to meet the requirement and adjust existing identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> |
| <p>27. Student Parking Lot 2 has a total of 107 parking spaces. The total number of accessible parking spaces is two. The required number of accessible parking is four. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> | <p>27. Provide two additional accessible parking spaces. Car parking spaces shall be 96 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |
| <p>28. Student Parking Lot 2 has two designated accessible (A) parking spaces and one access aisle. Accessible parking space width for A1</p> | <p>28. Restripe the parking lot where the accessible parking spaces are located to include two additional access aisles. Car parking spaces</p> |

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| <p>(measured 92 inches) which is below the minimum required width of 96 inches. Access aisle 1 (measured 56 inches), which is below the minimum required width of 60 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> | <p>shall be 96 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> |
| <p>29. Student Parking Lot 2 has one identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 59 3/4 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> | <p>29. Provide two additional signs to meet the requirement and adjust existing identification sign to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> |
| <p>30. Staff Parking Lot 1 has a total of 83 parking spaces. The total number of required accessible parking spaces is four. However, the required accessible parking spaces from Staff Parking Lot 1 were added to Staff Parking Lot 2 (three accessible parking spaces added), and Staff Parking Lot 3/Next to Bus Loop one accessible parking space added) in order to be on the shortest accessible route and entrance to the building. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces)</p> | <p>30. Parking spaces shall be permitted to be located in different parking facilities if substantially equivalent or great accessibility is provided in terms of distance from an accessible entrance or entrances and user convenience. Parking spaces that shall be located on the shortest accessible route from parking to an accessible entrance. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces)</p> |
| <p>31. Staff Parking Lot 2 has a total of seven parking spaces. The total number of required accessible parking spaces is one. Three accessible parking spaces were added from the required number in Student Parking Lot 1 to Staff Parking Lot 2 in order to provide parking to be on the shortest accessible route from parking to an accessible entrance. Accessible parking space width for A1 (measured 93 1/2 inches), A2 (measured 93 inches) and A3 (measured 91 1/2 inches) which is below the minimum required width of 96 inches. Access aisle 1 (measured 55 inches), which is below the minimum required width of 60 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> | <p>31. Restripe the parking lot where the accessible parking spaces are located. Car parking spaces shall be 96 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> |
| <p>32. Staff Parking Lot 2 has four identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1</p> | <p>32. Adjust existing identification signage to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible</p> |

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| <p>(measured 55 1/2 inches), Sign 2 (measured 56 inches), Sign 3 (measured 57 inches), Sign 4 (measured 57 1/2 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> | <p>parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> |
| <p>33. Staff Parking Lot 3 has a total number of 23 parking spaces. The total number of required accessible parking spaces is one. One accessible parking space was added from the required number in Student Parking Lot 1 to Staff Parking Lot 3 in order to provide parking to be on the shortest accessible route from parking to an accessible entrance. Accessible parking space width for A1 (measured 92 1/2 inches), which is below the minimum required width of 96 inches. Access aisle 1 (measured 56 inches), which is below the minimum required width of 60 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> | <p>33. Restripe the parking lot where the accessible parking spaces are located. Car parking spaces shall be 96 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> |
| <p>34. Staff Parking Lot 3 has two identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 59 inches) and Sign 2 (measured 57 1/4 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> | <p>34. Adjust existing identification signage to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> |

RECOMMENDATION

During Bethel School District's onsite review, the following was observed and identified at Spanaway Lake High School:

| Identified Issue | Recommended Solution |
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| 1. Eyewash stations, emergency showers, and drinking fountains are not being tested for water flow and pressure on a regular basis. | 1. Provide a system in place where the eyewash stations, emergency shower and drinking fountains are tested and documented. |
| 2. Adjustable tables are being used by teachers in various rooms. | 2. Provide at least one adjustable table/ workstation in each room in order to provide accessibility. |
| 3. Crank Roll Paper Towel Dispensers are being used in the Women's and Men's Locker Rooms. This type of dispenser makes it difficult to use with one hand. In order for it to be operable it shall not require tight grasping, pinching or twisting of the wrist. | 3. Replace with hands-free, automatic, or wall-mounted paper towel dispensers or with air hand dryers. |

FACILITIES CHART

| School | Building | Beginning of Construction | Accessibility Standard | Date/Type of Alterations | Accessibility Standard for Alteration |
|-------------------------------|--|----------------------------------|--|--|--|
| Challenger High School | 18020 B Street E., Spanaway, WA 98387 | 1988 | American National Standards Institute (ANSI) | All portables were built in 1988 and Challenger High School opened in the fall of 1998. The campus operated as a junior high until 1995 when it was converted to Challenger High School. | See details below. |
| | Portable A, Main Office/Counseling | 1988 | ANSI | N/A | N/A |
| | Portable B, CTE | 1988 | ANSI | N/A | N/A |
| | Portable C, ELA | 1988 | ANSI | N/A | N/A |
| | Portable D1, History, D2, ELA | 1988 | ANSI | N/A | N/A |
| | Portable E2, Art | 1988 | ANSI | N/A | N/A |
| | Portable F, Staff Lounge | 1988 | ANSI | N/A | N/A |
| | Portable G, Math CTE | 1988 | ANSI | N/A | N/A |
| | Portable H, Math | 1988 | ANSI | N/A | N/A |
| | Portable I, PE | 1988 | ANSI | N/A | N/A |
| | Portable JI, SPED/Health, J2, ELA | 1988 | ANSI | N/A | N/A |
| | Portable K, Student Commons/ Health Room | 1988 | ANSI | N/A | N/A |

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| Portable L, Learning Support Assistance | 1988 | ANSI | N/A | N/A |
| Portable M, Culinary Arts | 1988 | ANSI | N/A | N/A |
| Portable N1, Social Studies, N2, Science | 1988 | ANSI | N/A | N/A |
| Portable P, Bethel Family Center | 1991 | Uniform Federal Accessibility Standards (UFAS) | N/A | N/A |
| Main Parking Lot | 1988 | ANSI | Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards |
| Staff/Bethel Family Center Parking | 1991 | UFAS | Restriped 2017 Restriped every three years or as needed. | 2010 ADA Standards |

Note: Uniform Federal Accessibility Standards (UFAS), the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between September 15, 2010 and March 14, 2012. Any corrective action initiated on or after March 15, 2012 must comply with the 2010 ADA Standards.

Challenger High School

| Finding | Required Corrective Action |
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| <p>1. There was no appropriate identification signage on the walls outside of Portable C1, Portable D1, Portable D2, Portable N1. (ANSI, 5.11 Identification)</p> | <p>1. Provide signage on the wall outside of the portables indicated, both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility)</p> |
| <p>2. Counter top height exceeds the maximum allowable height of 34 inches in Portable A (measured 41 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>2. Provide an accessible counter that is 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>3. Counter top height exceeds the maximum allowable height of 28 to 34 inches in Portable P (measured 42 inches). (UFAS, 4.32 Seating, Tables and Work Stations, 4.32.4 Height of Work Surfaces, 4.34.6.4 Work Surfaces)</p> | <p>3. Provide an accessible counter that is 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>4. Sink and counter top height exceeds the maximum allowable height of a horizontal working table (28 ½ inches to 33 ½ inches) and does not allow for a forward approach in Portable M (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>4. Provide an accessible sink with a forward approach and proper knee clearance of at least 27 inches high and 34 inches maximum above the floor. (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height, 306.3 Knee Clearance)</p> |
| <p>5. Sink, food prep area, is not accessible to and usable for individuals with disabilities in Portable M (measured 21 7/8 inches from the ground floor and 37 3/4 inches at the top) doesn't allow for a forward approach or for knee clearance under the sink of 27 inches minimum above the floor ground. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The</p> | <p>5. Provide an accessible sink with a forward approach and proper knee clearance of at least 27 inches high and 34 inches maximum above the floor. (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height, 306.3 Knee Clearance)</p> |

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| Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | |
| 6. Eyewash station spout heights exceed the maximum allowable height of 36 inches in Portable N2 (measured 39 inches). (ANSI, 5.7 Water Fountains, 5.7.2) | 6. Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) |
| 7. The drinking fountain spout is not accessible for individuals with disabilities in the Courtyard (measured 36 1/4 inches) along with the pressure to operate (measured 9 pounds of pressure). (ANSI, 2.13 Appropriate Number, 5.7 Water Fountains) | 7. Provide accessible drinking fountains with a spout height of 36 inches maximum above the finish floor or ground, within reach ranges, and operable with one hand and not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds maximum. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 308 Reach Ranges, 309 Operable Parts, 309.3 Height, 309.4 Operation) |
| 8. Desk layout, desk width distance from one desk to another and aisles are not accessible and do not allow program access in Portable B (measured 27 inches) or in Portable J (ranges measured 12-17 inches). (ANSI, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | 8. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) |
| 9. The current door to Portable J2 has an 1 1/4 inch change in level at the doorsill that could prevent the use of the door by the physically disabled. (ANSI, 5.2 Entrances, 5.2.1, 5.3 Doors and Doorways, 5.3.3) | 9. Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) |
| 10. The setting of the door closers, door opening force, exceeds the maximum allowable pressure to be operable by a single effort to Portable C1 (measured 15 pounds of pressure), Portable D1 (measured 20 pound of pressure), Portable D2 (measured 25 pounds of pressure), Portable E2 (measured 15 pounds of pressure), Portable K (measured 15 pounds of pressure), Portable N (measured 10 pounds of pressure) and could prevent the use of the door by the physically disabled. At least one primary | 10. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) |

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| <p>entrance to each building shall be usable by individuals in a wheelchair. (ANSI, 5.2.1, 5.3 Doors and Doorways, Note 1, Note 2, Note 3: Specifications apply both to exterior and interior doors and doorways.)</p> | |
| <p>11. AED located in the Portable A, Main Office, (measured 6 inches from the wall) and the shredder cabinet (measured 19 inches from the wall); shelf by door in Portable D1 (measured 12 inches from the wall); fire extinguisher in Portable M (measured 4 1/2 inches from the wall) and protrude into the hallway. Every effort shall be made to remove hazards to individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair), 5.7 Water Fountains)</p> | <p>11. Provide fixtures, e.g. magazine racks, seating cubes, plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that do not protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the AED, shredder cabinet, and fire extinguisher. (2010 ADA Standards, 307 Protruding Objects)</p> |
| <p>12. Drain pipes were not covered or insulated so that a wheelchair individual without sensation could burn themselves under the sinks in Portable E, Portable L, Women’s Restroom and Men’s Restroom, Portable N1, Restroom. (ANSI, 5.6 Toilet Rooms, 5.6.3)</p> | <p>12. Insulate exposed pipes under lavatories and sinks to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces)</p> |
| <p>13. Soap dispenser exceeds the maximum allowable height of 40 inches from the floor ground in Portable N1 (measured 51 1/4 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>13. Adjust soap dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>14. Paper towel dispenser exceeds the maximum allowable height of 40 inches from the floor ground in Portable E2 (measured 57 inches), Portable L, Women’s Restroom, (measured 58 inches), Portable M (measured 59 1/2 inches, Portable N1 (measured 58 5/8 inches), Portable N2 (measured 58 5/8 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>14. Adjust paper towel dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.36 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>15. Paper towel dispenser exceeds the maximum high forward reach allowable</p> | <p>15. Adjust paper towel dispensers to be located within the reach ranges specified in 308, 48</p> |

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| <p>height of 48 inches and the maximum high side reach allowed in Portable P (measured 55 inches). (UFAS, 4.2 Space Allowance and Reach Ranges, 4.2.5 Forward Reach, 4.2.6 Side Reach)</p> | <p>inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>16. There are no handles on the designated accessible stalls, making them inaccessible to individuals with disabilities, in Portable E, Women's Restroom and Men's Restroom. (ANSI, 5.6 Toilet Rooms, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>16. Provide handles on the designated accessible stalls in Portable E, Women's and Men's Restrooms that are within reach ranges and will be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. (2010 ADA Requirements, 308 Reach Ranges, 309 Operable Parts, 309.3 Height, 309.4 Operation, 404 Doors, Door-ways, and Gates, 404.2.7 Door and Gate Hardware)</p> |
| <p>17. Toilet seat cover dispensers exceed the maximum allowable height of 40 inches from the floor ground in Portable E, Women's Restroom (measured 50 inches), Portable E, Men's Restroom (measured 49 inches), Portable L, Women's Restroom accessible staff (measured 57 inches), Portable N1, Restroom accessible stall (measured 57 1/2 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>17. Adjust toilet seat cover dispenser to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.36 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>18. Toilet seat cover dispenser exceeds the maximum allowable height of 48 inches in Portable P (measured 56 inches). (UFAS, 4.2 Space Allowance and Reach Ranges, 4.2.5 Forward Reach, 4.2.6 Side Reach)</p> | <p>18. Adjust toilet seat cover to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>19. Coat hook heights exceed the maximum allowable height of 40 inches above the floor ground in the Portable E, Women's Restroom (measured 67 inches), Portable E, Men's Restroom (measured 68 inches), Portable L, Women's Restroom accessible staff (measured 75 and 77 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>19. Provide coat hooks to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves)</p> |

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| <p>20. Mirror exceeds the maximum allowable height of 40 inches above the floor ground, measured from the top of the shelf and the bottom of the mirror, in Portable N restroom (measured 49 7/8 inches). (ANSI, 5.6 Toilet Rooms, 5.6.4)</p> | <p>20. Adjust mirror to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors)</p> |
| <p>21. Restrooms in Portable M have clear openings that are less than 32 inches wide. The closest accessible restroom is 225 feet by Campus Security or the Student Union. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 5.3 Doors and Doorways, 5.6 Toilet Rooms)</p> | <p>21. Provide accessible restrooms with door openings that have a clear width of 32 inches minimum. (2010 ADA Standards, 404 Doors, Doorways, and Gates, 404.2.3 Clear Width, 603 Toilet and Bathing Rooms, 604 Water Closets and Toilet Compartments)</p> |
| <p>22. First Aid Kit height (measured 57 inches) in the Portable M is not accessible to individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>22. Provide First Aid Kit to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges)</p> |
| <p>23. The concrete public walk from Main Office to the Courtyard is outside in the elements and transitions to gravel where all the tables are located which doesn't allow for the area to be readily accessible for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 4.2 Walks)</p> | <p>23. Provide an accessible route that has a level ground surface that is stable, firm, and slip resistant to the Courtyard, where the tables are located. (2010 ADA Standards, 302 Floor or Ground Surfaces, 402 Accessible Routes)</p> |
| <p>24. Ramp to Portable L as you veer to the left of LSA, walking surface has a significant change in level as it just ends with a huge drop off, over 24 inches, with no handrails. This is safety issue for students, not just for those individuals with disabilities. (ANSI, Chapter 5 Buildings, 5.1 Ramps with Gradients, 5.1.1)</p> | <p>24. Provide handrails with gripping surfaces to be 34 inches minimum and 38 inches maximum vertically above the walking and ramp surfaces. (2010 ADA Standards, 405 Ramps, 505 Handrails, 505.4 Height).</p> |
| <p>25. Ramp to Portable N (had measurements ranging from 6.7 percent to 8.5 percent) exceeds the maximum slope of 1:12. (ANSI, Chapter 5 Buildings, 5.1 Ramps with Gradients, 5.1.1)</p> | <p>25. Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> |

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| <p>26. Main Parking Lot has a total number of 66 parking spaces. The total number of accessible spaces is two, one of which is identified as van accessible. The minimum required number of accessible parking spaces is three. (2010 ADA Standards, 208 Parking Spaces, 208.2 Mini-mum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> | <p>26. Provide accessible parking space. Car parking spaces shall be 96 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Mini-mum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |
| <p>27. Main Parking Lot has two identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 39 1/2 inches) and Sign 2 (measured 29 1/2 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> | <p>27. Provide one additional sign to meet the requirement and adjust existing identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> |
| <p>28. Staff/Bethel Family Center Parking Lot has a total number of 30 parking spaces. There are three, two are required, designated accessible (A) parking spaces, A1 is accessible, and two access aisles. Accessible parking space width for A2 (measured 89 1/2 inches) and A3 (measured 89 inches) which is below the minimum required width of 96 inches. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> | <p>28. Restripe the parking lot where the accessible parking spaces are located. Car parking spaces shall be 96 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Mini-mum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking)</p> |
| <p>29. Staff/Bethel Family Center Parking Lot has two identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 31 inches) and Sign 2 (measured 33 inches). One sign is missing. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> | <p>29. Provide one additional sign to meet the requirement and adjust existing identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification)</p> |

RECOMMENDATION

During Bethel School District’s onsite review, the following was observed and identified at Challenger High School:

| Identified Issue | Recommended Solution |
|--|--|
| 1. The eyewash stations are not tagged or being tested for water flow and pressure on a regular basis. | 1. Provide a system in place where the eyewash stations are tagged, tested and documented. |
| 2. Portable N2 accessible restroom is being used as storage. | 2. Accessible restrooms to be maintained in order to provide access to students with disabilities. |

COMPARABLE FACILITIES

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female, or disabled students should be located in similar proximity to the associated classrooms, shops or laboratories.

Citations: Title IX (34 CFR § 106.33)
Section 504 (34 CFR § 104.4(b)(ii))
Section 504 (34 CFR § 104.34(c))
Guidelines (VI. A., D.)

Findings: Based on review of materials (including policy for providing aid and services, policies regarding the use of guide dogs and assistive devices, student handbook, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

WORK STUDY CO-OP EDUCATION, JOB PLACEMENT AND APPRENTICESHIP TRAINING

An agency not only has the responsibility to provide its services in a nondiscriminatory manner; it also has the responsibility not to foster discrimination by businesses that provide employment, workplace learning sites or apprenticeship training programs. To be a partner in discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, national origin or disability.

Citations: Title IX (34 CFR § 106.38(a))
Guidelines (VII. A., B.)

Findings: Based on review of materials (including review of enrollment data, policies regarding nondiscrimination in program offerings, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

EMPLOYMENT

Guideline: Recipients are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

The recipient must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex or disability. The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin sex or disability. Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions to the positions and make reasonable accommodations for the physical or mental limitations of disabled, qualified applicants, unless it can be demonstrated that such accommodations would impose undue hardship.

Citations: Title IX (34 CFR §§ 106.51-61)
Section 504 (34 CFR § 104.11-14)
Guidelines (VIII. A.-F.)

Findings: Based on review of materials (including employee handbook, employment applications, personnel website, etc.), interviews, and onsite walk-through, no evidence of findings was observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

The MOA onsite review in the Bethel School District provided time to observe great educational opportunities being provided to students at Spanaway Lake High School and Challenger High School. Please see the commendation below.

COMMENDATION

The Bethel School District, Spanaway Lake High School and Challenger High School, is to be commended for its commitment to evaluating, modifying, providing, and expanding CTE program areas.

Bethel School District has looked at the 16 Pathways/Career Clusters established at the national level, that are recognizable across the United States, and have combined them into 7 Pathways more closely aligned to their course offerings: Arts and Communications, Business and Marketing, Engineering and STEM, Information Technology, Health Science, Human Services, and Science and Natural Resources.

Exploratory and preparatory courses are clearly outlined as well as postsecondary training options and potential careers.

Spanaway Lake High School's Navy JROTC program provides students with multiple opportunities to work together collaboratively, be prepared and disciplined, and to be successful leaders. Furthermore, Spanaway Lake High School's growing Career and Technical Student Organization, DECA, is preparing

students to be academically prepared, community oriented, professionally responsible leaders and entrepreneurs who are career and college ready.

Challenger High School is able to offer smaller class sizes that allow teachers to provide individualized instruction to students. The Culinary Arts program is exciting as it combines comprehensive instruction, food production, and customer service training. Students learn the value of hands-on, rigorous learning that meets industry standards.

Students interviewed have stated their teachers are very patient, really know who they are as a person, and want to help them succeed in all areas of their lives.

Interviews with administrators, teachers, students, counselors, and staff indicated that students are given all the supports and tools they need to be well prepared to successfully enter the workforce, technical school, community college, four-year college, apprenticeship in the trades, or military. Well done!

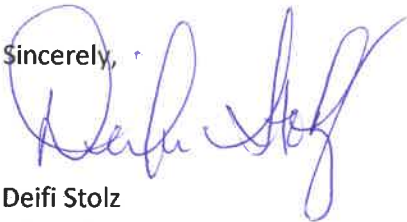
This concludes the civil rights monitoring visit Letter of Findings (LOF). While the foregoing citations will help to shape the district's Voluntary Compliance Plan (VCP), full instructions about the Plan's content are discussed in the opening page of this letter.

Bethel School District is asked to submit a VCP within 90 calendar days from the date of receipt of this letter and no later than November 22, 2019.

Please remember the district's ongoing responsibility to comply with the civil rights laws and the *Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services On the Basis of Race, Color, National Origin, Sex, and Handicap*.

If you need further clarification or technical assistance with corrective action planning to address noncompliance items, please contact me at deifi.stolz@k12.wa.us or (360) 725-6254. Again, thank you for your cooperation and the efforts of your staff in this review.

Sincerely,



Deifi Stolz
Program Supervisor
Methods of Administration
Career and Technical Education
Learning and Teaching Division
Office of Superintendent of Public Instruction

cc:

Ron Mayberry, Career and Technical Education Director
Bethel School District

Jeffrey Johnson, Principal
Challenger High School

Susie Askew, Principal
Spanaway Lake High School

Michael Christianson, Chief Technology Officer
Bethel School District

Cathie Carlson, Director of Construction and Planning
Bethel School District

David Wells, Facilities Director
Bethel School District

Rebecca Wallace, Executive Director
Career and Technical Education
Office of Superintendent of Public Instruction

Terri Colbert, Perkins Program Specialist
Workforce Training and Education Coordinating Board



SUPERINTENDENT OF PUBLIC INSTRUCTION

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

December 17, 2019

Superintendent Shane Backlund
Selah School District
316 W. Naches Avenue
Selah, WA 98942

Re: Civil Rights Review Letter of Findings (LOF)

Dear Superintendent Backlund:

On January 23-25, 2019, Deifi Stolz, Methods of Administration (MOA) Coordinator Program Supervisor for the Office of Superintendent of Public Instruction (OSPI) conducted an onsite civil rights compliance review of the career and technical education (CTE) programs and support services of Selah High School and Selah Academy. The purpose of the review was to determine the compliance status of the district's CTE programs and facilities with Federal Civil Rights laws.

As explained during the review, and subsequent phone calls and email correspondence, the Letter of Findings (LOF) summarizes the observations and conclusions reached as a result of this onsite visit. Having the district provide documentation, and having staff members available during the compliance review was greatly appreciated.

Thank you for your school district's participation in the review. This onsite review was conducted according to requirements of the following federal Civil Rights statutes and regulations:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin*;
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex*;
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability*;
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability*;
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

This LOF is a formal follow-up to the exit interview conducted on January 25, 2019. This letter details noncompliance issues and required corrective actions. The purpose of an LOF is threefold:

1. To recommend changes, although not violations of Civil Rights laws, would enhance the experience of all students at the Selah School District;
2. To summarize the specific instances of noncompliance identified during the onsite review; and

3. To provide notice of requirement to the district to submit a final Voluntary Compliance Plan (VCP) to OSPI, **60 calendar days from the date of receipt of this letter and no later than February 21, 2020**. Only the items identified as “Findings” must be addressed. “Recommendations” need not be addressed in the VCP.

The VCP must:

1. List each specific instance of noncompliance identified in the LOF and provide the district’s detailed plan of action to correct each finding.
2. Establish and provide a timetable for remediation of each instance of noncompliance, including month and year.
3. For each corrective action, provide documentation to OSPI, as appropriate, links to website, and photographic evidence.
 - a. In the efforts to bring action items into compliance, the subrecipient may request technical assistance from OSPI.
 - b. A follow-up onsite review may be requested by the subrecipient for OSPI to verify the completion of corrective action items.
4. Identify the personnel responsible for implementing each planned activity. The VCP must be signed and dated by the district superintendent.

The following findings are based upon a review of practices and procedures at the Selah School District, including data and materials submitted, discussion with the staff members compiling the documentation for the review, interviews with administrative and building staff, students, and onsite observations of programs and facilities.

Items of noncompliance are identified below in the same order as the Onsite Civil Rights Compliance Checklist. The statutory authority precedes description of the finding.

ADMINISTRATIVE

In order to comply with United States Department of Education Guideline requirements for career and technical education programs, school districts, and skill centers, must have in place basic procedures regarding federal statutes and implementing departmental regulations: 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, as well as, *Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*.

There are four basic administrative requirements:

1. Designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II (Title IX (34 CFR Part 106.8(a)); Section 504 (34 CFR Part 104.7(a)); Title II (28 CFR Part 35.107); Guidelines (IV. O.).
2. Annual public notice of nondiscrimination (Guidelines IV.O.)
3. Continuous notification of nondiscrimination (Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106) and,
4. A grievance procedure that allows students and parents an avenue for dealing with alleged discrimination (Title IX (34 CFR Part 106.8(b)); Section 504 (34 CFR Part 104.7(b)); Title II (28 CFR Part 35.107(b)).

Citations: Title II (28 CFR § 35.106-107)
 Title VI (34 CFR § 100.6(d))
 Title IX (34 CFR § 106.8-9)
 Section 504 (34 CFR § 104.7-8)
 Guidelines (IV. O.)

| Finding | Required Corrective Action |
|--|---|
| <p>1. The Selah School District did not publish, post or disseminate the annual nondiscrimination statement. The statement was not published in the Selah School District’s newsletter or in the appropriate language for communities of national origin with limited English proficiency. As identified, there is a national origin community of Spanish speaking individuals within district boundaries.</p> <p>(Guidelines IV. O.; Title VI (34 CFR § 100.6(d))</p> | <p>1. The Annual Notification must be published and disseminated prior to the beginning of school and include a brief summary of CTE program offerings, admissions criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. The statement must also include language indicating lack of English language proficiency will not be a barrier to admission and participation in career and technical education programs.</p> <p>As identified, the national origin community of Spanish speaking individuals in the Selah School District should receive this notification in similar fashion within district boundaries. All other identified communities (if there are others so designated) should receive this notification in their language of national origin as required.</p> <p>The district is to place the Annual Notification in the Selah School District’s newsletter, on the district’s main website homepage, and on Selah High School, Selah Academy and Selah Middle School website homepages.</p> |

2. The comprehensive continuous nondiscrimination statement was not included in the following Selah School District items:

The Selah High School Staff Handbook 2017-18 School Year, Selah High School Student Handbook 2017-18, and the Selah High School Crisis Management Lock Down/Evacuation Procedures 2017-18, 2018-19 Registration Packet for Grade 9, 2018-19 Registration Packet for Grades 10-12, Selah High School Newsletter, October 2016, Selah High School Community Connection, November 2016, Selah High School Newsletter, December 2016, Selah High School Newsletter, February 2016, Selah High School Community Connection, February 2017, Selah High School Newsletter, March 2017, Selah High School Newsletter, April 2017, Selah High School Newsletter, May 2017, Selah High School Community Connection, May 2017, Selah High School Newsletter, June 2017, Selah High School Community Connection, June 2017, Selah High School Activities brochure, Marketing Classes Your Future Starts Now! Selah High School flyer, Selah What Is DECA? flyer, Selah High School Electives Night flyer, Selah High School DECA Why Join? Flyer, Selah High School Life is Engineering, TSA information packet, What is FCCLA? flyer, Sports Med Club Meeting flyer, Health Sciences Club Meeting flyer, ASL Pah Club flyer, Energize with FFA flyer, Get Up to Speed with FFA flyer, Selah High School 2016-17 presentation, Selah High School 2017-18, Selah Education Foundation presentation, Selah High School to Host Open House for the Class of 2021 flyer, Selah Academy End of October Celebrations Issue, October 28, 2016, Selah Academy November 2016 Celebration Issue, Selah Academy December 2016 Celebrations Issue, Selah Academy January 2017 Celebrations Edition, Selah Academy End of February News/Celebrations, February 28, 2018, Selah Academy March Celebrations/Awards Issue, March 24, 2017, Selah Academy, April Awards/Celebrations Edition, April 28, 2017, Selah Academy May

2. The district should include the consistent comprehensive continuous nondiscrimination statement in the Selah High School Staff Handbook, Selah High School Student Handbook, and the Selah High School Crisis Management Lock Down/Evacuation Procedures, Registration Packets for Grades 9-12, Selah High School Newsletters, Selah High School Community Connections, Selah High School Activities brochure, Marketing Classes Your Future Starts Now! flyer, Selah High School flyer, Selah What Is DECA? flyer, Selah High School Electives Night flyer, Selah High School DECA Why Join? Flyer, Selah High School Life is Engineering, TSA information packet, What is FCCLA? flyer, Sports Med Club Meeting flyer, Health Sciences Club Meeting flyer, ASL Pah Club flyer, Energize with FFA flyer, Get Up to Speed with FFA flyer, Selah High School presentations, Selah High School–Selah Education Foundation presentations, Selah High School to Host Open House flyers, Selah Academy Celebrations Issues, Selah School District Activities Calendar, Selah School District Community and Work-Based Learning Student Application (Paid/Non-Paid), Selah School District Student Work Record, Work Based Learning form, Selah School District Worksite Learning Student Learning Agreement, Selah School District My Post-High School Plan, CTE recruitment materials, flyers, brochures, publications, press releases, as well as, in an obvious location on each school website, just like it is on the district’s website.

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| <p>Awards/Celebrations Edition, May 26, 2017, Selah Academy May/June Awards/Celebrations Edition, May/June 2017, Selah School District Activities Calendar, Selah School District Community and Work-Based Learning Student Application (Paid/Non-Paid), Selah School District Student Work Record, Work Based Learning form, Selah School District Worksite Learning Student Learning Agreement, Selah School District My Post-High School Plan.</p> <p>Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106)</p> | |
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Recommendations:

1. A sample annual nondiscrimination notice may be found at the OSPI website: <http://www.k12.wa.us/CareerTechEd/CivilRights.aspx>.
<http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx>
2. Sample comprehensive continuous nondiscrimination notices may be found at the Office for Civil Rights website: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. For state nondiscrimination requirements, visit <http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx>.

RECRUITMENT

Recipients must conduct their recruitment activities in a manner that does not exclude or limit opportunities on the basis of race, color, national origin, sex or disability. Recruitment material descriptions of career and occupational opportunities are not to be limited on the basis of race, color, national origin, sex or disability. To the extent possible, recruiting teams should represent persons of different races, national origins, sexes and disabilities. Recipients must ensure that career counselors can effectively communicate with students with disabilities, and students with limited English proficiency. Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration. If a recipient’s service area contains a community with persons of limited English proficiency, information must be available and distributed to that community in its language.

Citations: Title IX (34 CFR § 106.23(a)(b))
Guidelines (V. A., C., E.)

| Finding | Required Corrective Action |
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| <p>1. Based on review of recruitment materials (including course catalog, brochures and marketing materials, staff demographics, plans for the provision of services, samples of materials in other languages, etc.), interviews, and onsite walk-through, the district's service area contains a national origin community of Spanish speaking individuals in Selah School District with limited English language skills.</p> <p>There were no publications available in Spanish in the Counseling Office.</p> <p>Guidelines (V. E.)</p> | <p>1. Provide and distribute recruitment promotional materials, brochures to include CTE course offering, pamphlets, scholarships, internships, apprenticeships, industry-based certification and licensure information, transcript requests, course catalog, and other current promotional materials published in Spanish, minimally in the Main Office and Guidance and Counseling Offices.</p> |

ADMISSIONS

Admissions policies, procedures, and criteria may not exclude students from CTE programs on the basis of race, color, national origin, disability, or sex, including pregnancy, childbirth, and termination of pregnancy. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex or persons with disabilities, the criteria should be validated as essential to success in the program. Pre-admissions inquiries about marital status must be avoided or from applying any rule concerning the parental status of a student or applicant that discriminates on the basis of sex.

Citations: Title IV (34 CFR § 100.3(a) and (b)(1)(v))
Section 504 (34 CFR § 104.4(a)(b))
Guidelines (IV. A., F., K., L., N.)

Findings: Based on review of materials (including admissions policies, admission applications, enrollment data, etc.), interviews, and onsite walk-through, no evidence of findings was observed during this onsite review. Disproportionality within programs, in regards to race, was evaluated and analyzed based on community, school, and program enrollment demographic data. Interviews with the leadership team, administrators, and students did not indicate that the disproportionality was the result of discrimination.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

STUDENT FINANCIAL ASSISTANCE

Financial assistance is available to all students regardless of sex, race, color, national origin or disability. Education agencies shall not limit honors, awards and scholarships to a group on the basis of race, color, national origin, sex or disability unless such targeting is done to provide opportunities to members of a group that has traditionally not been represented. Outside agencies that provide awards are to be notified of the agency's nondiscrimination policy. A school district may administer or assist in the administration of scholarships or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, and similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin or with a particular

disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarship on the basis of sex, race, national origin or disability.

Because financial aid is often the stumbling block for those historically underrepresented in postsecondary education, secondary schools should assist all students preparing for postsecondary experiences, including disadvantaged students, to become aware of this requirement. If a recipient's service area contains a community of national origin minority persons with limited English language skills, material and information used to notify students of financial aid opportunities must be disseminated to that community in its language.

Citations: Title VI (34 CFR §§ 100.3(a)(b))
Title IX (34 CFR § 106.37)
Section 504 (34 CFR § 104.4(a)(b))
Guidelines (VI. B.)

Findings: Based on review of materials (including financial aid data, materials for students regarding financial aid, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

CAREER COUNSELING PROGRAM

Counseling programs may not include steering of students toward particular courses or programs that are traditional for the student's race, color, national origin, English language proficiency, sex or disability. Services and materials related to career counseling and recruitment must be free of discrimination and stereotyping in language, content and graphic illustration. If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

Citations: Title VI (34 CFR §§ 100.3(a)(b))
Title IX (34 CFR § 106.36)
Section 504 (34 CFR §§ 104.4(a)(b), 104.37(b))
Guidelines (V. A., B., D.)

Findings: Based on review of materials (including promotional and recruitment materials, enrollment demographics and admission policies), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

SERVICES FOR STUDENTS WITH DISABILITIES

A qualified person with a disability may not, on the basis of disability, be excluded from, denied benefits of, or subjected to discrimination in any course, program or activity. A recipient may not restrict access for students with disabilities to schools, programs, services and activities. Section 504 and ADA, Title II are based upon the premise that students with disabilities will be integrated with their non-disabled peers to the extent possible.

Citations: Title II (28 CFR 35.130)
Section 504 (34 CFR §§ 104.4(a), 104.33-36)
Guidelines (IV. N.)
Guidelines (VI. A.)

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its program or service due to inaccessibility of facilities, according to Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990. All agencies are responsible for compliance with Section 504 and Title II. Applicable accessibility standards are determined by the date the facility was constructed or last altered. In general, in the case of a facility's alteration, only the altered portion is affected. The standards are as follows (ANSI, UFAS, 1991 ADA Standards, and 2010 ADA Standards):

- Existing facilities/Section 504 (34 CFR, § 104.22 and 28 CFR § 35.150) – construction or alteration initiated before 6/4/1977. Programs or activities offered in existing facilities must, when viewed in their entirety, be readily accessible to persons with disabilities.
- New construction/Section 504 (34 CFR § 104.23) – construction or alteration initiated between 6/4/1977 and 1/17/1991. Facilities follow American National Standards Institute, Inc. (ANSI) A117.1-1961 (R1971).
- New construction/Section 504 (34 CFR § 104.23) – construction or alteration initiated on or after 1/18/1991 and before 1/27/1992. Facilities follow the Uniform Federal Accessibility Standards (UFAS) Appendix A to 41 CFR subparts 101-19.6.
- New construction/Americans with Disabilities Act Title II (Appendix A of 28 CFR Part 36)
 - For construction or alteration initiated on or after 1/27/1992 facilities followed Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADA Standards)¹ Appendix A of 28 CFR Part 36, or may have elected to follow UFAS Appendix A to 41 CFR subpart 101.
 - For construction or alteration initiated on or after 3/15/2012 facilities follow the 2010 ADA Standards.² For construction or alterations initiated between 1/27/1992 and 3/15/2012, the UFAS, the 1991 ADA Standards (without the elevator exemption) or the 2010 ADA Standards may be used. Only one standard may be used for each building or alteration.
 - The UFAS, the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between 9/15/2010 and 3/15/2012.

Citations: Title II (28 CFR §§ 35.133, 35.149-151)
Section 504 (34 CFR § 104.21-23)
Guidelines (IV. N.)

¹ Note: There are two sets of ADA Standards: one that was issued in 1991 and a second issued in 2010.

² The 2010 ADA Standards are available at:

<http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.pdf>

All violations are noted below. Where no violation is noted, no evidence of findings was observed during this onsite review. Selah School District facilities were examined for accessibility, based on the applicable standards for construction and alteration:

- **Parking:** Based on standards for slope, sufficient spaces, appropriate space sizes, and correct signage.
- **Signage:** Based on standards for signage, buildings, facilities and accessible passageways.
- **Entrances and Exits:** based on standards for thresholds, force required to open, walkways, clearance, handle requirements, etc.
- **Ramps:** Based on standards for appropriate slopes, with handrails.
- **Interior Doors:** Based on standards for operable door handles, door clearances, automatic openers (where available), and force required to open.
- **Accessible Route:** Based on standards for hallway displays, grade changes, accessible aisles, elevator requirements, carpeting, ramps, stairs, etc.
- **Services:** Based on standards for services regarding water fountains, fire alarm systems, evacuation plans, restricted areas, etc.
- **Student Lockers:** Based on standards for student lockers.
- **Ramps:** Based on standards for ramps, including surface, grade, railing, length, etc.
- **Elevators:** Based on standards for elevator accessibility.
- **Telephones:** Based on standards for telephones.
- **Restrooms:** Based on standards for unisex, female and male-identified restrooms, including signage, sinks, mirrors, pipes, dispensers, reach, stalls, doors, etc.
- **Counselor Offices:** Based on the standards for counselor offices, including counter height.
- **Library:** Based on the standards for libraries, including table height, aisles, stack height, service counters, computer stations, etc.
- **Assembly Area:** Based on the standards for assembly areas.
- **Career Centers:** Based on the standards for career centers, including location, aisles, workstations, etc.
- **Classrooms:** Based on the standards for classrooms, including aisles, workstations, dispensers, eyewash stations, doors, sinks, etc.

FACILITIES CHART

| School | Building | Beginning of Construction | Accessibility Standard | Date/Type of Alterations | Accessibility Standard for Alteration |
|--------------------------|--------------------------------------|----------------------------------|--|---|--|
| Selah High School | 801 N. First Street, Selah, WA 98942 | 1986 | American National Standards Institute (ANSI) | See details below. In 2014, a 23,713 square foot addition. The addition included a gym, locker rooms, fitness room, four classrooms, and two science labs. | See details below. 2010 ADA Standards |
| | Main Office | 1986 | ANSI | N/A | N/A |
| | Attendance Office | 1986 | ANSI | N/A | N/A |
| | Guidance and Counseling Office | 1986 | ANSI | N/A | N/A |
| | Career Center | 1986 | ANSI | N/A | N/A |
| | Health Room | 1986 | ANSI | N/A | N/A |
| | SPED Classrooms/ Office | 1986 | ANSI | N/A | N/A |
| | Cafeteria | 1986 | ANSI | N/A | N/A |
| | Commons | 1986 | ANSI | N/A | N/A |
| | Library | 1986 | ANSI | N/A | N/A |
| | Auditorium | 1986 | ANSI | N/A | N/A |
| | Original Gym | 1986 | ANSI | N/A | N/A |
| | New Auxiliary Gym | 2014 | 2010 ADA Standards | N/A | N/A |
| | Original Boys and Girls Locker Rooms | 1986 | ANSI | N/A | N/A |
| | New Boys and Girls Locker Rooms | 2014 | 2010 ADA Standards | N/A | N/A |

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|-----------------------------|------|--------------------|---|--|
| Original Weight Room | 1986 | ANSI | N/A | N/A |
| New Fitness Room | 2014 | 2010 ADA Standards | N/A | N/A |
| Wrestling Room | 1986 | ANSI | N/A | N/A |
| Choir Room | 1986 | ANSI | N/A | N/A |
| Band and Practice Rooms | 1986 | ANSI | N/A | N/A |
| Classrooms | 1986 | ANSI | N/A | N/A |
| Metal Shop | 1986 | ANSI | N/A | N/A |
| Wood Shop | 1986 | ANSI | N/A | N/A |
| Portable 1 | 1995 | 1991 ADA Standards | N/A | N/A |
| Portable 2 | 1995 | 1991 ADA Standards | N/A | N/A |
| Portable 3 | 1995 | 1991 ADA Standards | N/A | N/A |
| Portable 4 | 1995 | 1991 ADA Standards | N/A | N/A |
| Portable 5 | 1995 | 1991 ADA Standards | N/A | N/A |
| Portable 6 | 1995 | 1991 ADA Standards | N/A | N/A |
| Greenhouse | 1986 | 1991 ADA Standards | N/A | N/A |
| Main Parking Lot | 1986 | ANSI | Resealed 2016 Accessible Parking Signage Added 8/2017 Restriped 8/2017 Restriped every to other year | 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards 2010 ADA Standards |
| Student/Teacher Parking Lot | 1986 | ANSI | Resealed 8/2017 Accessible Parking Signage Added 8/2017 Restriped | 2010 ADA Standards 2010 ADA Standards |

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| | | | | 8/2017 Restriped every other year | 2010 ADA Standards 2010 ADA Standards |
| | Back Parking Lot | 1986 | ANSI | Resealed 8/2017 Restriped 8/2017 Restriped every other year | 2010 ADA Standards 2010 ADA Standards |
| | Bus Loop Parking Lot | 1981 | ANSI | Resealed 8/2017 Restriped 8/2017 Restriped every other year | 2010 ADA Standards 2010 ADA Standards |

Note: Uniform Federal Accessibility Standards (UFAS), the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between September 15, 2010 and March 14, 2012. Any corrective action initiated on or after March 15, 2012 must comply with the 2010 ADA Standards.

Selah High School

| Finding | Required Corrective Action |
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| <p>1. Door opening force exceeds the maximum allowable pressure to be operable by a single effort to Main Entrance, second door, (measured 10 pounds of pressure), Room 102 (measured 9 pounds of pressure), Room 103 (measured 9 pounds of pressure), Room 104 (measured 15 pounds of pressure), Room 105 (measured 10 pounds of pressure), Room 106 (measured 10 pounds of pressure), Room 206 (measured 10 pounds of pressure), Room 209 (measured 9 pounds of pressure), Room 210 (measured 8 pounds of pressure), Room 213 (measured 10 pounds of pressure), Room 214, Metal Shop Instruction Classroom (measured 9 pounds of pressure), Room 214, Wood Shop (measured 17 pounds of pressure), Room 215 (measured 10 pounds of pressure), Room 216 (measured 10 pounds of pressure), Room 217 (measured 17 pounds of pressure), Room 301 (measured 15 pounds of pressure), Room 306 (measured 12 pounds of pressure), Room 308 (measured 15 pounds of pressure), Counseling Office, from Cafeteria entrance, (measured 12 pounds of pressure), Counseling Office (measured 8 pounds of pressure), Main Office Women’s Restroom (measured 10 pounds of pressure), Main Office Men’s Restroom (measured 7 pounds of pressure), Women’s Basement Restroom (measured 15 pounds of pressure), Men’s Second Floor Restroom (measured 9 pounds of pressure), Women’s Second Floor Restroom (measured 9 pounds of pressure), Girl’s Gym (measured 14 pounds of pressure), Girl’s Locker Room (measured 9 pounds of pressure), Boy’s Locker Room (measured 15 pounds of pressure), Wrestling Room (measured 15 pounds of pressure). (ANSI, 5.3 Doors and Doorways)</p> | <p>1. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |
| <p>2. There was no appropriate identification signage on the wall outside to the Men’s Basement Restroom indicating there is an accessible restroom. Also, Room 205 indicates teachers name underneath in braille, however,</p> | <p>2. Provide signage on the outside of the rooms indicated, both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram</p> |

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| <p>the sign does not indicate it is the Boy's Locker Room. (ANSI, 5.11 Identification)</p> | <p>field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility)</p> |
| <p>3. Health Restroom and Boy's Locker Room, designated accessible stall, is not accessible for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair, Walks 4.2, 4.4.2)</p> | <p>3. Provide accessible restrooms. (2010 ADA Standards, Chapter 6: Plumbing Elements and Facilities, 603 Toilet and Bathing Rooms, 604 Water Closets and Toilet Compartments, 605 Urinals, 606 Lavatories and Sinks, 609 Grab Bars)</p> |
| <p>4. Drain pipes were not covered or insulated so that a wheelchair individual without sensation could burn themselves under the sinks in the Wood Shop (main area), Main Office Women's Restroom, Main Office Men's Restroom, Men's Basement Restroom, Women's Basement Restroom, Men's Second Floor Restroom, Women's Second Floor Restroom, Boy's Locker Room, Girl's Gym, Girl's Locker Room, Room 212, Metal Shop Men's Restroom, Metal Shop Women's Restroom. (ANSI, 5.6 Toilet Rooms, 5.6.3)</p> | <p>4. Insulate exposed pipes under lavatories and sinks to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces)</p> |
| <p>5. Paper towel dispenser handle exceeds the maximum allowable height of 40 inches from the floor ground in in Room 206 (measured 54 inches), Room 212 (measured 54 inches), Room 215 (measured 57 inches, no handle), Room 303 (measured 53 inches), Library (measured 16 pounds of pressure), Health Room (measured 53 1/2 inches), Women's Gym Main Office Women's Restroom (measured 53 inches with spindle-type handle), Main Office Men's Restroom (measured 57 inches), Men's Basement Restroom (measured 55 inches), Women's Basement Restroom (measured 57 1/2 inches), Men's Second Floor Restroom (measured 56 inches), Women's Second Floor Restroom (measured 60 inches), Girl's Gym (measured 61 inches), Boy's Locker Room (measured 51 inches), Girl's Locker Room (measured 61 inches), Wrestling Room (measured 73 inches), Metal Shop Area (measured 64 inches), Metal Shop Women's Restroom (measured 61 1/2 inches), Metal Shop Men's Restroom (measured 61 1/2 inches). (ANSI, 5.6 Toilet</p> | <p>5. Adjust paper towel dispenser handle height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. Also, provide handles that are within the reach ranges and to be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach, 308.3 Side Reach, 309 Operable Parts, 309.3 Height, 309.4 Operation, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |

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| <p>Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | |
| <p>6. Soap dispenser exceeds the maximum allowable height of 40 inches from the floor ground in the Main Office Women’s Restroom (measured 50 inches), Main Office Men’s Restroom (measured 50 inches), Metal Shop Men’s Restroom (measured 52 1/2 inches), Metal Shop Women’s Restroom (measured 52 1/2 inches), Metal Shop Area (measured 60 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>6. Adjust soap dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>7. Sanitary napkin dispenser handle exceeds the maximum allowable height of 40 inches from the floor ground in the Main Office Women’s Restroom (measured 61 inches), Women’s Basement Restroom (measured 50 1/2 inches), Women’s Second Floor Restroom (measured 54 inches), Girl’s Gym (measured 52 1/2 inches), Girl’s Locker Room (measured 59 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>7. Adjust sanitary napkin disposal dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |
| <p>8. Toilet seats in the accessible stalls are below the minimum height of 20 inches in the Main Office Women’s Restroom (measured 16 1/2 inches), Main Office Men’s Restroom (measured 16 inches), Men’s Basement Restroom (measured 16 1/2 inches), Men’s Second Floor Restroom (measured 16 inches), Women’s Basement Restroom (measured 16 1/2 inches), Women’s Second Floor Restroom (measured 16 inches), Girl’s Locker Room (measured 16 inches), Girl’s Gym (measured 16 inches). (ANSI, 5.6 Toilet Rooms, 5.6.2)</p> | <p>8. Provide accessible toilet seats (17 to 19 inches from the finish floor) in each location. Seats shall not be sprung to return to a lifted position. (2010 ADA Standards, 604.4 Seats)</p> |
| <p>9. Toilet seat covers in the accessible stalls exceed the maximum allowable height of 40 inches from the floor ground in the Main Office Women’s Restroom (measured 55 inches), Main Office Men’s Restroom (measured 55 inches), Men’s Second Floor Restroom (measured 53 inches), Women’s Second Floor Restroom (measured 57 inches), Girl’s Locker Room (measured 53 inches), Room 212 (measured 54 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>9. Adjust toilet seat cover height to be located within the reach ranges specified in 308. Locate the toilet seat cover so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> |

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| <p>10. Mirror exceeds the maximum allowable height of 40 inches above the floor ground to the bottom of the mirror in Room 212 restroom (measured 49 inches). (ANSI, 5.6 Toilet Rooms, 5.6.4)</p> | <p>10. Adjust mirror to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors)</p> |
| <p>11. Microwave height (measured 54 inches) in Room 212 and is not accessible to and usable for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>11. Provide microwave to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges)</p> |
| <p>12. First Aid Kit height (measured 58 inches) in the Wood Shop is not accessible to and usable for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>12. Provide First Aid Kit to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges)</p> |
| <p>13. Coat hook height in the accessible stalls makes it not accessible to and usable for individuals with disabilities in the Main Office Women’s Restroom (measured 65 inches), and Main Office Men’s Restroom (measured 58 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>13. Provide a coat hook to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves)</p> |
| <p>14. Coat/apron/personal protective equipment hook height makes it not accessible to and usable for individuals with disabilities in Room 303 (measured 65 inches), Metal Shop (measured 76-77 1/2 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>14. Provide a coat/apron hook to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves)</p> |
| <p>15. Drinking fountain in the Main Gym (measured 20 inches from the wall), Wood Shop (measured 13 inches from the wall), on the first floor by the Electrical Room (measured 18 inches from the wall), Boy’s Locker Room by the coaches office (measured 13 inches from the wall and has a broken handle), Girl’s Gym (measured 13 inches from the wall and has a broken handle) protrudes into the hallway. Every effort shall be made to remove hazards to individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and</p> | <p>15. Provide fixtures, e.g. magazine racks, seating cubes, plants, or rails with leading edges below 27 inches and not more than 80 inches above the finish floor ground that do not protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects)</p> |

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| <p>Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 5.7 Water Fountains)</p> | |
| <p>16. Eyewash station spout heights exceed the maximum allowable height of 36 inches in the Metal Shop (measured 46 inches), Wood Shop (measured 45 inches), Room 303 (measured 38 inches). (ANSI, 5.7 Water Fountains, 5.7.2)</p> | <p>16. Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow)</p> |
| <p>17. Emergency shower handle in the Metal Shop (measured 68 1/2 inches), Wood Shop (measured 69 inches) and is not accessible to and usable for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 5.7 Water Fountains)</p> | <p>17. Provide an accessible emergency shower handle with a maximum height of 48 inches. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2)</p> |
| <p>18. Sink and counter top height exceeds the maximum allowable height of a horizontal working table (28 ½ inches to 33 ½ inches) and does not allow for a forward approach in Room 206 (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>18. Provide an accessible sink with a forward approach and proper knee clearance of at least 27 inches high and 34 inches maximum above the floor. (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height, 306.3 Knee Clearance)</p> |
| <p>19. Sink handles (spindle type) are not accessible for individuals with disabilities in Room 309 (measured 36 inches at the top). (ANSI 2.13 Appropriate Number)</p> | <p>19. Provide accessible faucet handles that are within reach ranges and will be operable with one hand not requiring tight grasping, pinching, or twisting of the wrist. (2010 ADA Standards, 308 Reach Ranges, 309 Operable Parts, 309.3 Height, 309.4 Operation)</p> |
| <p>20. Counter top heights do not allow for the program areas to be readily accessible for individuals with disabilities in Room 212 (measured 36 inches), Health Room (measured 36 inches), Room 216 (measured 36 inches), Room 303 (measured 36 inches), Thor Concessions (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>20. Provide accessible counters that are 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter)</p> |
| <p>21. The tables in the Cafeteria (measured 26 inches to the bar at the bottom) and are not accessible to students with disabilities. (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair)</p> | <p>21. Provide accessible tables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902</p> |

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| | Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) |
| 22. The student workstations/worktables are not accessible to students with disabilities in Room 101 (fixed seating), Room 102 (fixed seating), Room 103 (fixed seating, Room 105 (fixed seating), Room 106 (fixed seating), Room 217 (measured 26 inches at the bottom), Room 301 (measured 25 1/2 inches at the bottom), Room 308 (fixed seating), Room 214, Metal Shop Instruction Classroom (measured 23 1/2 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | 22. Provide accessible student workstations/worktables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) |
| 23. The student worktables (fixed seating) do not allow for proper knee clearance of a least 27 inches high, 30 inches wide, and 19 inches deep, and need to be at an accessible height of 28 inches minimum and 34 inches maximum above the floor in Portable 5 (measured 26 1/4 inches at the bottom) and Portable 6 (measured 26 1/4 inches at the bottom). 1991 ADA Standards, 28 CFR Part 36, 4.32.3 Knee Clearance) | 23. Provide accessible student workstations/worktables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) |
| 24. The student worktables exceed the maximum height from 28 inches to 34 inches in the Greenhouse (measured 36 at the top) and are not accessible to individuals with disabilities. (1991 ADA Standards, 28 CFR Part 36, 4.32 Fixed or Built-In Seating and Tables, 4.32.4 Height of Tables or Counters) | 24. Provide accessible student worktables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) |
| 25. Desk layout, desk width distance from one desk to another and aisles (measured 24 inches) are not accessible and do not allow program access in Room 101. (ANSI, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | 25. Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) |
| 26. Wrestling Room walking surface and floor has a significant change in level to the mat (two inches) which does not allow for the area to be program accessible for individuals with | 26. Provide an accessible route that has a level ground surface that is stable, firm, and slip resistant. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. |

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| <p>disabilities. (ANSI, 2.13 Appropriate Number, 4.2 Walks, 5.5 Floors)</p> | <p>Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled, 402 Accessible Routes)</p> |
| <p>27. Main Gymnasium has bleachers that are not readily accessible or provide program access (steps too tall and bleachers too steep) for individuals with disabilities. Furthermore, individuals with disabilities are asked to sit on the sideline and then asked again to move due to their not being enough room. This is an exclusionary practice. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.1 Wheelchair Specifications, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 3.4 The Individual Functioning on Crutches)</p> | <p>27. Provide bleachers that have wheelchair spaces. (2010 ADA Standards, 221.2.3.2 Vertical Dispersion, 903 Benches)</p> |
| <p>28. Ramp to Portables 5 and 6 (had measurements ranging from 11.1 to 11.9 percent at the top of Incline 2 and measurements ranging from 8.1 to 8.7% at the center of Incline 3) exceeds the maximum slope of 1:12 or 8.33 percent. (1991 ADA Standards, 28 CFR Part 36, 4.8 Ramps, 4.8.4 Landings)</p> | <p>28. Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise)</p> |
| <p>29. The greenhouse does not have an accessible route inside and has uneven gravel for flooring. (1991 ADA Standards, 28 CFR Part 36, 4.3 Accessible Route, 4.3.2 Location, 4.3.8 Changes in Levels, 4.5 Ground and Floor Surfaces)</p> | <p>29. Provide an accessible route that has a level ground surface that is stable, firm, and slip resistant in the greenhouse. (2010 ADA Standards, 206 Accessible Routes, 302 Floor or Ground Surfaces, 402 Accessible Routes)</p> |
| <p>30. Main Parking Lot has 325 parking spaces, seven accessible stalls, should measure 96 inches minimum, and four accessible aisles, should measure 60 inches minimum, but are not the correct measurements, not properly marked and do not have accessible signage. The required number of accessible parking is eight, one of which shall be designated as van accessible. Three of the accessible parking stalls are next to the main flow of traffic and do not have access aisles. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle)</p> | <p>30. Reconfigure and restripe the parking lot to include three accessible parking spaces, one van accessible parking space, one additional access aisle. Also, provide eight accessible identification signs. Van accessible parking spaces shall be 132 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. Accessible identification sign to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces,</p> |

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| | 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification) |
| 31. The walk from the Main Parking Lot has an abrupt change in level from the concrete pavement to the ramp that measures 1 3/4 inches and another abrupt change in level that measures 11 inches by 16 inches. Walks shall be of a continuing common surface, not interrupted by steps or abrupt changes in level. Whenever walks cross other walks, driveway, or parking lots they should blend into a common level. (ANSI 4.2 Walks, 4.2.2, 4.2.3) | 31. Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of ¼ inch high maximum shall be permitted to be vertical. Changes in level between ¼ inch high minimum and ½ inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) |
| 32. The walk from the Bus Parking Lot has an abrupt change in level from the pavement to the curb that measures 2 1/4 inches. Walks shall be of a continuing common surface, not interrupted by steps or abrupt changes in level. Whenever walks cross other walks, driveway, or parking lots they should blend into a common level. (ANSI 4.2 Walks, 4.2.2, 4.2.3) | 32. Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of ¼ inch high maximum shall be permitted to be vertical. Changes in level between ¼ inch high minimum and ½ inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) |

RECOMMENDATION

During Selah School District’s onsite review, the following was observed and identified at Selah High School:

| Identified Issue | Recommended Solution |
|---|---|
| 1. In the Metal Shop, there is no safety striping on the floor around the equipment. | 1. Provide appropriately positioned safety striping on the Metal Shop floors. |
| 2. In the Wood Shop, there is partial safety striping on the floor around equipment. | 2. Provide appropriately positioned safety striping on the Wood Shop floors. |
| 3. Eyewash stations, emergency showers, and drinking fountains are not being tested for water flow and pressure on a regular basis. | 3. Provide a system in place where the eyewash stations, emergency shower and drinking fountains are tested and documented. |

FACILITIES CHART

| School | Building | Beginning of Construction | Accessibility Standard | Date/Type of Alterations | Accessibility Standard for Alteration |
|----------------------|--|---------------------------------------|------------------------|--|---------------------------------------|
| Selah Academy | 308 W. Naches Avenue, Selah, WA 98942 | 1925 District Administration Building | Program Access | This was the old Selah High School that was remodeled in 1969 for use as an elementary school. It is shared with the District Office. In 2015 there was demolition of buildings A, B, and part of E. Buildings G, H, and the District Administration Office was remodeled. | See details below. |
| | District Administration Building & Selah Academy | 1925 | Program Access | Demolished south wing of original 1925 building and remodeled in 1976. Remodeled again in 2015. | 2010 ADA Standards |
| | E Building, Academy & District Early Learning Center | 1925 | Program Access | Remodeled in 1976 | Program Access |
| | Gymnasim Building | 1925 | Program Access | Remodeled to become a Cafeteria/Multi-Purpose Room 1964 | Program Access |
| | Main Parking Lot | 1925 | Program Access | Restriped 2015 Restriped every three years or as needed. | 2010 ADA Standards |

Note: Uniform Federal Accessibility Standards (UFAS), the 1991 ADA Standards, or the 2010 ADA Standards apply to construction or alteration that occurred between September 15, 2010 and March 14, 2012. Any corrective action initiated on or after March 15, 2012 must comply with the 2010 ADA Standards.

Selah Academy

| Finding | Required Corrective Action |
|---|--|
| <p>1. Door opening force to the doors was excessive, making it not easily operable and did not make the program areas readily assessable in E-3 (measured 16 pounds of pressure), E-4 (measured 10 pounds of pressure), and Gymnasium (measured 12 pounds of pressure). (Section 504 (34 CFR § 104.22)</p> | <p>1. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |
| <p>2. Door opening force exceeded the maximum 5 pounds of pressure for pushing or pulling open the door in the Main Office (measured 6 pounds of pressure), Student Center (measured 12 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> | <p>2. Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> |
| <p>3. Women’s Restroom (27 1/2 inch door width) by the Gymnasium, Men’s Restroom by the Gymnasium (27 1/2 inch door width), Staff Restroom in the preschool area (28 inch door width) are not readily accessible. There are no accessible toilet room stalls that allow for access for individuals with disabilities. The distance from the classroom to the restroom is 470 feet out in the elements. (Section 504 (34 CFR § 104.22)</p> | <p>3. Provide accessible water closets and toilet compartments that have 32 inch minimum door width openings. (2010 ADA Standards, 404 Doors, Doorways, and Gates, 404.2.3 Clear Width Chapter 6: Plumbing Elements and Facilities, 603 Toilet and Bathing Rooms, 604 Water Closets and Toilet Compartments)</p> |
| <p>4. There is ADA accessible signage on the outside of the Unisex Restroom in the preschool area that is not accessible. (ANSI, 5.11 Identification)</p> | <p>4. Remove ADA accessible signage on the wall outside of the Staff Restroom in the preschool area. Place directional signage where there is ADA accessible restrooms. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility)</p> |

COMPARABLE FACILITIES

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female, or disabled students should be located in similar proximity to the associated classrooms, shops or laboratories.

Citations: Title IX (34 CFR § 106.33)
Section 504 (34 CFR § 104.4(b)(ii))
Section 504 (34 CFR § 104.34(c))
Guidelines (VI. A., D.)

Findings: Based on review of materials (including policy for providing aid and services, policies regarding the use of guide dogs and assistive devices, student handbook, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

WORK STUDY CO-OP EDUCATION, JOB PLACEMENT AND APPRENTICESHIP TRAINING

An agency not only has the responsibility to provide its services in a nondiscriminatory manner; it also has the responsibility not to foster discrimination by businesses that provide employment, workplace learning sites or apprenticeship training programs. To be a partner in discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, national origin or disability.

Citations: Title IX (34 CFR § 106.38(a))
Guidelines (VII. A., B.)

Findings: Based on review of materials (including review of enrollment data, policies regarding nondiscrimination in program offerings, etc.), interviews, and onsite walk-through, no evidence of findings were observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

EMPLOYMENT

Guideline: Recipients are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

The recipient must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex or disability. The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin sex or disability. Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions to the positions

and make reasonable accommodations for the physical or mental limitations of disabled, qualified applicants, unless it can be demonstrated that such accommodations would impose undue hardship.

Citations: Title IX (34 CFR §§ 106.51-61)
Section 504 (34 CFR § 104.11-14)
Guidelines (VIII. A.-F.)

Findings: Based on review of materials (including employee handbook, employment applications, personnel website, etc.), interviews, and onsite walk-through, no evidence of findings was observed during this onsite review.

Required Action: The MOA Civil Rights onsite review did not reveal any evidence of a violation. No action required at this time.

The MOA onsite review in the Selah School District provided time to observe great educational opportunities being provided to students at Selah High School and Selah Academy. Please see the commendation below.

COMMENDATION

The Selah School District, Selah High School and Selah Academy, is to be commended for its commitment to high levels of student growth, development, and achievement in CTE program areas; AG Bio, Horticulture, Fabrication, Principles of Bio-Medical Science, Science Inquiry, Human Body Systems, Sports Medicine, American Sign Language, Business and Marketing, Financial Math, Digital Technology, Computer Science, Marketing, Teaching Academy, Early Childhood Careers, Childhood Development, Interior Design, Culinary, Video Production, Digital Arts, Year Book, Photography, Health and Leadership, Fashion, Engineering and Design, Drafting, Woodworking, Construction, and Technology.

The career and technical student organization (CTSO) student groups in CTE pathways, are growing as they help to further student's knowledge and skills by participating in activities, events, and competitions. The advisors for FFA, DECA, TSA, and FCCLA are actively encouraging students to join and benefit from all that a CTSO has to offer in student leadership development.

Furthermore, the district's three-year priorities for 2016-19 adopted by the Board of Directors was very apparent in the MOA Civil Rights onsite review process:

1. Collaboration for Student Learning – People working together in interdependent teams create the best opportunity for students to learn.
2. Environments for Success – Within every building and program our District, we cultivate environments where students and adults can grow.
3. Readiness for Early Learning – Eliminating gaps in achievement among students based on race, language, economic status and disability ensures that our core purpose is realized.
4. Closing the Achievement Gap – The pre-k through 3rd grade years are essential to a child's development and ensuring early readiness is the best proactive measure we can take to assure our students succeed.

Students interviewed at Selah High School stated their teachers are supportive, care about them and do all they can to help them graduate. CTE classes and programs have benefitted the students and have

provided a career pathway option for some students. Involvement in CTSOs have provided them with 21st century skills and leadership skills. Students are proud to be a part of the Selah Community.

Students interviewed at Selah Academy stated their teachers are very accommodating, respectful, caring and encourage them to be their best and keep them focused. Students are able to access credit recovery and work at their own pace as they work towards graduating. Students support one another with their respective individual journeys. No one sits alone as everyone belongs to the school community. Drug testing and services have greatly benefitted them. Several students have had a difficult lift and truly believe the school, teachers, and principal have save their lives. The students have made life-long connections.

Well done!

This concludes the civil rights monitoring visit Letter of Findings (LOF). While the foregoing citations will help to shape the district's Voluntary Compliance Plan (VCP), full instructions regarding the Plan's content are discussed in the opening page of this letter.

Selah School District is asked to submit a VCP within 60 calendar days from the date of receipt of this letter and no later than February 21, 2020.

Please remember the district's ongoing responsibility to comply with the civil rights laws and the *Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services On the Basis of Race, Color, National Origin, Sex, and Handicap*.

If you need further clarification or technical assistance with corrective action planning to address noncompliance items, please contact me at deifi.stolz@k12.wa.us or (360) 725-6254. Again, thank you for your cooperation and the efforts of your staff in this review.

Sincerely,



Deifi Stolz
Program Supervisor
Methods of Administration
Career and Technical Education
Learning and Teaching Division
Office of Superintendent of Public Instruction

cc: Colton Monti, Principal
Selah High School

Joe Coscarart, Principal
Selah Academy

Chad Quigley, Human Resources Executive Director and Title IX Coordinator
Selah School District

Frank Reno, Facilities Director
Selah School District

Jeff Cochran, Career and Technical Education Director
Selah School District

Rebecca Wallace, Executive Director
Career and Technical Education
Office of Superintendent of Public Instruction

Terri Colbert, Perkins Program Specialist
Workforce Training and Education Coordinating Board

MOA Voluntary Compliance Plans 2018-2019

The following subrecipients Voluntary Compliance Plans were included in the 2016-2018 Biennial Compliance Report Supplemental to OCR on April 12, 2019.

- Stanwood-Camano School District (Stanwood High School, Lincoln Hill High School, Stanwood Middle School)
- Lopez Island School District (Lopez Island High School)
- Pierce County Skill Center

They are not included in this report.

MOA Voluntary Compliance Plans 2019-2020

The following subrecipients received an MOA Civil Rights onsite review. The MOA Compliance Plans were approved during 2019-2020.

- Bethel 1 (Bethel High School, Graham-Kapowsin High School)
- Bethel 2 (Spanaway Lake High School, Challenger High School)
- Selah School District (Selah High School, Selah Academy)

Office of Superintendent of Public Instruction
 Methods of Administration On-Site Compliance Review
 VOLUNTARY COMPLIANCE PLAN

*This **Voluntary Compliance Plan (VCP)** calls for the subrecipient to address the areas found to be deficient and, at a minimum, perform the required corrective action. To complete the Plan: 1) Provide specific corrective action to be completed; 2) Identify the individual(s) responsible to address the issue; 3) Project a targeted completion date for each item listed, and 4) Provide a statement of how completion of each remedy will be reported and verified to State Agency.*

District Name: Bethel School District

Bethel 1: Bethel High School ([BHS](#)) and Graham-Kapowsin High School ([GKHS](#))

Date of Review: June 5-6, 2018

| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
|-----------------------|--|---|---------------------------|------------------------|--|
| ADMINISTRATIVE | | | | | |
| 1. | <p><u>Annual Public Notice</u></p> <p>The Bethel School District did not publish, post or disseminate the annual nondiscrimination statement. The statement was not published in the Bethel News or in the appropriate language for communities of national origin with limited English proficiency. As identified, there is a national origin community of Spanish speaking individuals within district boundaries. (Guidelines IV. O.; Title VI (34 CFR § 100.6(d))</p> | <p>The Annual Notification will be published and disseminated prior to the beginning of the school year which will include:</p> <ul style="list-style-type: none"> • A brief summary of CTE program offerings, admissions criteria, and • the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. • The notice will be distributed in a manner that will reach students, employees, applicants, and • Communities of national origin minority with limited English language skills in the area. The statement must also include language indicating lack of English language proficiency will not be a barrier to admission and participation in career and technical education programs. | Ron Mayberry | 8/31/20 | <p>PDF copies will be provided in English and Spanish.</p> <p>In addition, links to corrected websites will be provided.</p> |

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| | | <p>As identified, the national origin community of Spanish speaking individuals in Bethel School District should receive this notification in similar fashion within district boundaries. All other identified communities (if there are others so designated) should receive this notification in their language of national origin as required.</p> <p>The district is to place the Annual Notification in the Bethel News, on the district's main website homepage, and on each high school and middle school website homepages.</p> | | | |
| 2. | <p><u>Continuous Nondiscrimination Statement</u></p> <p>Inconsistent use of the comprehensive continuous nondiscrimination statement (based on a review of materials including district newsletters, bulletins, press releases, brochures, handbooks, school calendars, course catalogs, admissions materials, job announcements, district and high school websites, etc.).</p> <p>There are various versions of what should be the consistent version of the comprehensive continuous nondiscrimination statement.</p> <p>The Bethel School District High School Course Catalog 2017-18 School Year did not include the protected class of sex.</p> <p>The Bethel School District's Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation did not include the protected class of sex nor include person(s) designated to handle inquiries, phone numbers, or addresses.</p> | <p>The following district sub groups will update noted publications in addition to new publications with the continuous nondiscrimination statement:</p> <ul style="list-style-type: none"> • Bethel School District Communications Department • Bethel High School • Graham-Kapowsin High School • CTE Department <p>In addition where required contact information will be inserted to support inquiries.</p> | Ron Mayberry | 4/1/20 | PDF copies and photos of displays will be provided |

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| <p>Bethel High School's The Career & Technical Education Marketing Sales & Service brochure did not include person(s) designated to handle inquiries, phone numbers, or addresses.</p> <p>The Bethel School District's Student Calendar 2017-18 and the Bethel School District's Career & College Readiness Career & Technical Education Community Report 2016-17 did not include the <i>address</i> for the Title IX Officer, Section 504 Coordinator, Executive Director for Special Education, Executive Director for Human Resources, Civil Rights Coordinator, and Director of Equity and Achievement.</p> <p>The Bethel School District's Bullying brochure, The Eagle's Nest, August 2017, The Eagle's Nest, January 2018, The Eagle's Nest, May/June 2018 did not include the <i>address</i> for the Assistant Director of Human Resources or the Executive Director of Special Services.</p> <p>The Bethel School District's Family and Student Access brochure, Bethel School District's Homeless brochure, Bethel Pride, August 2015, Bethel Pride, April 2016, Bethel Pride, November/December 2017, Bethel Pride, January/February 2018, Bethel School District's Career & College Readiness Career & Technical Education, May 2017 did not include the <i>address</i> for the Title IX Officer, Section 504 Coordinator, and Compliance Coordinator for Civil Rights Laws.</p> <p>The comprehensive continuous nondiscrimination statement wasn't included in the following Bethel School District items:</p> <p>Bethel High School 2017-18 Student Handbook, Graham-Kapowsin High School 2017-18 Student Planner, Graham-Kapowsin High School Career and Technical Education Course Offerings, Graham-Kapowsin High School 9th Grade (Class of 2022) Course Selection Form, Graham-Kapowsin High School 10th Grade</p> | | | | |
|---|--|--|--|--|

| | | | | | |
|----|--|--|--------------|--------|--|
| | <p>(Class of 2021) Course Selection Form, Graham-Kapowsin High School 11th Grade (Class of 2020) Course Selection Form, Graham-Kapowsin High School 12th Grade (Class of 2019) Course Selection Form, Employee Safety & Health Handbook 2017-18, The Brave Times, December 8, 2017, The Brave Times, January 9, 2018, The Brave Times, February 1, 2018, The Brave Times, March 2, 2018, CTE Insider Career & College Readiness Newsletter, November 2017, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, Intro to Lifetime Fitness, Special Services Young Athletes Field Day Service Opportunity flyer, High School and Beyond Plan form, Career and Technical Education Work Based Learning-Employed (CTW2017) Syllabus, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form.</p> <p>Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106).</p> | | | | |
| | RECRUITMENT | | | | |
| 1. | Based on review of recruitment materials (including course catalog, brochures and marketing materials, staff demographics, plans for the provision of services, samples of materials in other languages, etc.), interviews, and onsite walk-through, the district's service area contains a national origin community of | All current materials utilized in BHS and GKHS offices, Counseling Center, Career Center, and the library will be reviewed and updated to a compliant state. | Ron Mayberry | 4/1/20 | PDF copies and photos of displays will be provided |

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| | <p>Spanish speaking individuals in Bethel School District with limited English language skills.</p> <p>There was a publication for enrollment and a poster with FAFSA information published in Spanish. There are publications available in other languages digitally in the Guidance and Counseling Offices and library. The majority of the publications were in English.</p> <p>Guidelines (V. E.)</p> | | | | |
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| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
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| | <p>ACCESSIBILITY BETHEL HIGH SCHOOL</p> | | | | |
| 1. | <p>Door opening force to the doors was excessive, making it not easily operable and did not make the program areas readily [accessible] in the Main Office Right Restroom (measured 15 pounds of pressure), Main Office Left Restroom (measured 15 pounds of pressure), Cafeteria/Commons (measured 10 pounds of pressure), Room 105 (measured 9 pounds of pressure), Room 106 (measured 10 pounds of pressure), Room 107 (measured 14 pounds of pressure), Room 108 (measured 11 pounds of pressure), Room 108A (measured 17 pounds of pressure), Room 109 (measured 20 pounds of pressure), Room 114 (measured 11 pounds of pressure), Room 115 (measured 14 pounds of pressure), Room 116 (measured 13 pounds of pressure), Room 118 (measured 8 pounds of pressure), Room 119 (measured 9 pounds of pressure), Room 121 (measured 12 pounds of pressure), Room 122 (measured 7 pounds of pressure), Room 201 (measured 8 pounds of pressure), Room 202 (measured 8 pounds of</p> | <p>The district is working on completing the work of adjusting the door force to be 5 pounds maximum to be compliant with the 2010 ADA standards.</p> | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | <p>pressure), Room 203 (measured 8 pounds of pressure), Room 204A (measured 14 pounds of pressure), Room 207 (measured 12 pounds of pressure), Room 208 (measured 8 pounds of pressure), Room 209 (measured 8 pounds of pressure), Room 210 (measured 8 pounds of pressure), Room 211 (measured 8 pounds of pressure), Room 213 (measured 8 pounds of pressure), Room 214 (measured 8 pounds of pressure), Room 216 (measured 7 pounds of pressure), Room 217 (measured 8 pounds of pressure), Student Store (measured 10 pounds of pressure), Library (measured 11 pounds of pressure), Career Center (measured 7 pounds of pressure), Auditorium (measured 11 pounds of pressure), Theater Men's Dressing Room (measured 16 pounds of pressure), Men's Restroom, outside of Gym, (measured 12 pounds of pressure), Women's Restroom, outside of Gym, (measured 15 pounds of pressure), Men's Locker Room (measured 12 pounds of pressure), Women's Locker Room (measured 14 pounds of pressure). (ANSI, 5.3 Doors and Doorways)</p> | | | | |
| 2. | <p>Door opening force exceeds the maximum allowable pressure of five pounds to Room 124 (measured 12 pounds of pressure). (1991 ADA Standards, 28 CFR Part 36, 4.13.11 Door Opening Force)</p> | <p>The district is working on completing the work of adjusting the door force to be 5 pounds maximum to be compliant with the 2010 ADA standards.</p> | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 3. | <p>Door opening force exceeds the maximum allowable pressure of five pounds to Room 110 (measured 10 pounds of pressure), Room 111 (measured 18 pounds of pressure), Room 111A (measured 17 pounds of pressure), Room 112 (measured 21 pounds of pressure), Room 113 (measured 11 pounds of pressure), Room 113 A (measured 15 pounds of pressure), Room 120 (measured 11 pounds of pressure), Room 123 (measured 14 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> | <p>The district is working on completing the work of adjusting the door force to be 5 pounds maximum to be compliant with the 2010 ADA standards.</p> | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 4. | There was no directional identification signage on the wall outside of the Main Office Right Restroom and Main Office Left Restroom and along the accessible route indicating where the closest accessible restrooms are located. (ANSI, 5.11 Identification) | We will be working with our vendor to determine the best placement of signage. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 5. | Exposed drain pipes in the Men's Second Floor Restroom and Women's Second Floor Restroom. (ANSI, 5.6.3) | Exposed pipes will be insulated | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 6. | Paper towel dispenser exceeds the maximum allowable height of 40 inches from the floor ground in the Main Office Right Restroom (measured 62 inches), Main Office Left Restroom (measured 62 inches), Room 106 (measured 59 inches), Room 108 (measured 55 inches), Room 109 (measured 56 inches), Room 122 (measured 55 1/2 inches), Men's Second Floor Restroom (measured 57 inches), Women's Second Floor (measured 57 inches), Commons (measured 73 inches), Student Store (measured 63 1/2 inches), Theater Men's Dressing Room (measured 63 inches), Women's Restroom, outside of Gym, (measured 58 inches), Men's Locker Room (measured 58 inches), Women's Locker Room (measured 58 1/4 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4) | - Room 106 has no paper towel or sink. - All paper towel dispensers will be adjusted to proper height. | David Moffat | 8/31/20 | Photo Evidence |
| 7. | Paper towel dispenser exceeds the maximum allowable height of 48 inches from the floor ground in Room 111 (measured 54 inches), Room 111A (measured 64 inches), Room 112 (measured 56 inches), Room 113A (measured 60 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | - Room 113A is a storage/workroom and not subject to the requirements. - All paper towel dispensers will be adjusted to proper height. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 8. | Soap dispenser exceeds the maximum allowable height of 40 inches from the floor ground in Main Office Right Restroom | - There is no sink in room 122. - Soap dispenser will be adjusted to the proper height. | David Moffat | 1/6/20 | Photographic evidence will be provided |

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| | (measured 54 inches), Room 122 (measured 50 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4) | | | | |
| 9. | Soap dispenser exceeds the maximum allowable height of 48 inches in Room 111 (measured 49 inches), Room 111A (measured 59 inches), Room 112 (measured 49 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | - Soap dispenser will be adjusted to the proper height. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 10. | The Men's Locker Room, accessible shower stall, has missing controls. It is important to properly maintain features of facilities that are required to be readily accessible to and usable by individuals with disabilities. (Title II, 28 CFR § 35.133(a)) | Shower controls have been installed | David Moffat | 8/31/19 | Photographic evidence will be provided |
| 11. | Mirrors exceed the maximum allowable height of 40 inches above the floor ground in the Men's Second Floor Restroom (measured 51 inches), Women's Second Floor Restroom (measured 51 inches). (ANSI, 5.6 Toilet Rooms, 5.6.4) | Mirrors will be adjusted to the proper height | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 12. | Women's and Men's Theater Dressing Room Restrooms are not accessible. There are no accessible toilet room stalls (measured 26 inches) that allow access for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | - Bethel SD will consult with vendor on feasibility of making these restrooms compliant. - As an interim measure directional signage will be put up to the closest accessible restrooms | David Moffat David Moffat | 8/31/20 1/6/20 | Photographic evidence will be provided |
| 13. | Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 108 (measured 45 inches), Room 108A (measured 46 inches), Room 109 (measured 45 inches), Room 110 (measured 45 inches). (ANSI, 5.7 Water Fountains, 5.7.2) | - Eyewash stations will be set to the required level | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 14. | Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 111 (measured 45 inches), Room 111A (measured 45 inches), Room 112 (measured 45 inches), Room 113 (measured 46 inches), Room 113A (measured 42 inches). (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) | - Room 113A is a staff storage/workroom - Eyewash stations will be set to the required level | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 15. | Counter top heights do not allow for the program areas to be readily accessible for individuals with disabilities in the Registrar Area (measured 46 1/2 inches), Student Store (measured 41 1/2 inches), Room 109 (measured 36 1/2 inches), Room 110 (measured 36 inches), Room 115 (measured 36 inches), Room 121 (measured 36 inches), Room 122A (measured 36 1/2 inches), Room 215 (measured 36 inches), Room 216 (measured 36 inches), Room 219 (measured 36 inches), Room 220 (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | - Bethel SD will work with vendor to determine solutions which meet the requirements of the 2010 ADA standards for accessible counters. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 16. | Counter top height exceeds the maximum allowable height of 34 inches in Room 111A (measured 38 inches), Room 120 (measured 36 1/4 inches). (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter) | - Bethel SD will work with vendor to determine solutions which meet the requirements of the 2010 ADA standards for accessible counters. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 17. | The student workstations/computer tables/ lab stations/tables are not accessible to students with disabilities in the Library (measured 26 inches at the bottom), Cafeteria/ Commons (measured 18 3/4 inches at the bottom of the bar), Room 108 (measured 24 inches), Room 118 (measured 26 1/2 inches at the bottom), Room 121 (fixed seating), Room 122A (measured 26 3/8 inches at the bottom). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | Appropriate furniture meeting ANSI requirements will be placed to meet requirements. | Ron Mayberry | 8/31/20 | Photographic evidence will be provided |
| 18. | Desk width distance from one desk to another is not accessible in Room 106 (measured 10 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. Aisle width distance is not accessible in Room 118 (measured 29 inches) and in Room 204 A/B aisle width distance (measured 27 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 4.2 Walks)Desk width distance from one desk to | Rooms will be arranged to provide the required clearance of 36" and accessible isles | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |

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| | another does not meet the minimum clearance of 36 inches in Room 112 (measured 26 1/2 inches) and Portables 16-17 (measured 19 1/2 to 20 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route) | | | | |
| 19. | Desk width distance from one desk to another does not meet the minimum clearance of 36 inches in Room 112 (measured 26 1/2 inches) and Portables 16-17 (measured 19 1/2 to 20 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route) | Rooms will be arranged to provide the required clearance of 36" and accessible isles | Ron Mayberry | 1/1/20 | Photographic evidence will be provided |
| 20. | Counters top height exceeds the maximum allowable height of a horizontal working table (28.5 inches to 33.2 inches) and are not accessible to students with disabilities in the Registrar, located in the Counseling Office, (measured 46 1/2 inches), Library (measured 38 3/4 inches), Student Store Counters (measured 41 1/2 inches), Student Store Cash Register Counter (measured 50 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | - Bethel SD will work with vendor to determine solutions which meet the requirements of the 2010 ADA standards for accessible counters. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 21. | Counter top height exceed the maximum allowable height of 34 inches in Room 110 (measured 36 inches), Room 111A (measured 38 inches), Room 113 (measured 36 inches), Room 120 (measured 36 1/2 inches). (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter) | - Bethel SD will work with vendor to determine solutions which meet the requirements of the 2010 ADA standards for accessible counters. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 22. | First Aid Kit is not accessible to and usable for individuals with disabilities in the Small Engines Room 121 (measured 71 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4) | An appropriate First Aid kit will be purchased and installed within reach range to the 2010 ADA standards. | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |

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| 23. | Fire Blanket handle is not accessible to and usable for individuals with disabilities in the Small Engines Room 121 height (measured 64 1/2 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4) | The Fire Blanket will be updated and installed within range to the 2010 ADA standards. | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |
| 24. | AED by Weight Room (measured 7 inches from the wall), paper towel dispenser in Cafeteria/ Commons (measured 7 1/4 inches from the wall), Attendance outside counter (measured 10 3/4 inches from the wall), ASB counter (measured 18 inches from the wall), water fountains by Rooms 101 and 102 (measured 12 1/2 inches and 18 inches from the wall) protrude into walks, halls, corridors, passages, and aisles. Every effort shall be exercise to obviate hazards to individuals with disabilities. (ANSI 5.13) | Compliance protrusion will be added to provide appropriate cane sweep of no more than 28" in height. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 25. | The Auditorium has a total of 360 seats. There are four ramps that exceed the maximum slope of 1:12. Ramp 1 (measured 12.9 percent to 14.4 percent), Ramp 2 (measured 14 percent to 14.4 percent), Ramp 3 (measured 8.5 percent to 15.8 percent), Ramp 4 (measured 13.4 percent to 15.8 percent). (ANSI, Chapter 5 Buildings, 5.1 Ramps with Gradients, 5.1.1) | - Bethel SD will work with vendor to provide accessible ramps provided to meet 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 26. | There was no appropriate identification signage with symbols of accessibility on the wall outside of the auditorium. There was no directional signage for the accessible route to the accessible seats, designated aisle seats, to the stage and to the elevator. (1991 ADA Standards, 28 CFR Part 36, 4.30 Signage, 4.30.7 Symbols of Accessibility) | - Bethel SD will work with our vendor to determine the best placement of signage. - ADA accessible signage to be placed on the outside of the auditorium. - Directional signage placed on the accessible route to accessible seats, designated aisle seats, to the stage, and to the elevator | David Moffat David Moffat David Moffat | 1/6/20 1/6/20 4/15/20 | Photographic evidence will be provided |
| 27. | Portable 5 and Portable 13 have ramps that exceed the maximum slope of 1:12 or 8.33 percent. Portable 5 ramp has slope ranges from the bottom to the top (measured 8.4 percent to 9.8 percent). Portable 13 has slope ranges from the bottom to the top (measured 8.4 percent to 8.6 percent). (1991 ADA Standards, 28 CFR Part 36, 4.8 Ramps, 4.8.2 Slope and Rise) | - Bethel SD will work with vendor to determine solutions to meet compliance on these items. Accessible ramps provided to meet ADA 2010 standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 28. | Main/Visitor/Staff Parking Lot has a total of 132 parking spaces. The parking space identification signs were below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. The two accessible (A) parking identification signage near the office entry A1 van accessible (measured 37 inches) and A2 (measured 39 inches). The four accessible (A) parking identification signage near the gym entry A1 van accessible (measured 26 inches), A2 (measured 32 inches), A3 van accessible (measured 28 inches), A4 (measured 24 inches). The three van accessible (A) parking identification signage near the stadium entry A1 (measured 43 inches), A2 (measured 43 inches), A3 (measured 43 inches). Such signs shall be located so they cannot be obscured by a vehicle parked in the space. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | Signs will be adjusted to meet 2010 ADA requirements | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 29. | Main/Visitor/Staff Parking Lot has a total of 132 parking spaces. The area near the gym has four accessible parking spaces, two of which are designated as van accessible, and two access aisles. Access Aisle 1 (measured 55 inches wide) which is below the 60 inches wide minimum. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces, 502.3 Access Aisle) | <ul style="list-style-type: none"> - Bethel SD will work with vendor to determine solutions to meet compliance on these items. - Main parking lot access aisles will be reconfigured and restriped to 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 30. | Main/Visitor/Staff Parking Lot has a total of 132 parking spaces. The van accessible parking spaces were below the minimum requirement of 132 inches wide. The area near the gym has one van accessible (A) parking space. Van A1 (measured 118 inches). The area near the stadium entry has three van accessible parking spaces. Van A1 (measured 124 inches), Van A2 (measured 109 inches), Van A3 (measured 111 inches). (2010 ADA Standards, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle) | <ul style="list-style-type: none"> - Bethel SD will work with vendor to determine solutions to meet compliance on these items. - Main parking lot accessible parking spaces will be reconfigured and restriped to 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 31. | <p>Student Parking Lot has a total of 195 parking spaces. The minimum required of accessible parking spaces is six, with access aisles, and identification signs. There are two accessible parking spaces, one is a van accessible parking space. The parking space identification sign was below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. Van accessible (A) parking identification signage was missing for A1, accessible A2 (measured 15 inches). (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 208.2.4, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification)</p> | <p>- Bethel SD will work with vendor to determine solutions to meet compliance on these items. - Student parking lot to be reconfigured to add four accessible parking spaces, adjacent parking spaces, adjacent access aisles and identification signage.</p> | David Moffat | 8/31/20 | Photographic evidence will be provided |
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| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
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| | ACCESSIBILITY GRAHAM-KAPOWSIN HIGH SCHOOL | | | | |
| 1. | Elevator, Car 1, by the Women's Locker Room hall lanterns are not working. The elevator in the Commons area has a light indicator that only worked on the first floor, and there were no audibles. (1991 ADA Standards, 28 CFR Part 36, 4.10 Elevators, 4.10.4 Hall Lanterns) | Otis Tech confirmed the elevator is compliant and lights operate as required. | David Moffat | 8/31/19 | |
| 2. | Desk width distance from one desk to another does not meet the minimum clearance of 36 inches in Room 159 (measured 25 inches), Room 170 (measured 15 inches), Room 206 (measured 28 inches), Room 208 (measured 29 inches), Room 237 (measured 23 inches), Room 249 (measured 29 inches), Room 256 (measured 29 inches), Room 256 (measured 29 inches), Portable 1 (measured 28 inches), Portable 2 (measured 28 inches). (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route) | Room will be arranged to provide the required clearance of 36" and accessible isles | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |
| 3. | Desk width distance from one desk to another does not meet the minimum clearance of 36 inches in Room 112 (measured 26 1/2 inches) and Portable 16-17 (measured 19 1/2 to 20 inches) and has no accessible aisles due to seating layout and desk-to-desk width distance. (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.3 Accessible Route) | Room will be arranged to provide the required clearance of 36" and accessible isles | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |
| 4. | Automatic door opener buttons to the Gym, Room 128, are not operational on both the inside and outside of the Gym. Automatic door opener button is inoperable due to the failure to maintain it, making the area not readily accessible for individuals with disabilities. (1991 ADA Standards, 28 CFR Part 36, 4.13 Doors, A4.13 Doors, 4.14.12 Automatic Doors and | Automatic door opener repaired. | David Moffat | 8/31/19 | Photographic evidence will be provided |

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| | Power Assisted Doors, (Title II, 28 CFR § 35.133(a)) | | | | |
| 5. | There was no appropriate identification signage with symbols of accessibility on the wall outside of the Men's Locker Room (half a sign and not readable), Women's First Floor Staff Restroom, Men's First Floor Staff Restroom, Men's Restroom across from the Auditorium (no tactile or braille). (1991 ADA Standards, 28 CFR Part 36, 4.30 Signage, 4.30.7 Symbols of Accessibility) | - We will be working with our vendor to determine the best placement of signage. - ADA accessible signage to be placed on the wall outside of the rooms indicated. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 6. | Door opening force exceeds the maximum allowable pressure of five pounds to Room 122 (measured 12 pounds of pressure), Room 122C (measured 13 pounds of pressure), Room 122E (measured 11 pounds of pressure), Room 122H (measured 13 pounds of pressure), Room 140 (measured 12 pounds of pressure), Room 142 (measured 16 pounds of pressure), Room 146 (measured 12 pounds of pressure), Room 151 (measured 15 pounds of pressure), Room 152 (measured 16 pounds of pressure), Room 154 (measured 23 pounds of pressure), Room 155 (measured 16 1/2 pounds of pressure), Stage (measured 16 pounds of pressure), Room 170 (measured 15 pounds of pressure), Room 175 (measured 22 pounds of pressure), Room 176 (measured 15 pounds of pressure), Room 177 (measured 24 pounds of pressure), Room 178 (measured 16 pounds of pressure), Room 179 (measured 17 pounds of pressure), Room 180 (measured 13 pounds of pressure), Room 202 (measured 14 pounds of pressure), Room 203 (measured 12 pounds of pressure), Room 204 (measured 12 pounds of pressure), Room 205 (measured 13 pounds of pressure), Room 206 (measured 12 pounds of pressure), Room 207 (measured 12 pounds of pressure), Room 208 (measured 11 pounds of pressure), Library (measured 15 pounds of pressure), Room 213 (measured 12 pounds of pressure), Room 215 (measured 14 pounds of pressure), Room 217 (measured 12 pounds of pressure), Room 229 (measured 15 pounds of pressure), Room 231 | The district has completed the work of adjusting the door force to be 5 pounds maximum to be compliant with the 2010 ADA standards. | David Moffat | 1/6/20 | Photographic evidence will be provided |

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| | (measured 11 pounds of pressure), Room 232 (measured 14 pounds of pressure), Room 234 (measured 12 pounds of pressure), Room 235 (measured 15 pounds of pressure), Room 236 (measured 14 pounds of pressure), Room 237 (measured 12 pounds of pressure), Room 238 (measured 17 pounds of pressure), Room 247 (measured 12 pounds of pressure), Room 249 (measured 18 pounds of pressure), Room 250 (measured 14 pounds of pressure), Room 252 (measured 14 pounds of pressure), Room 253 (measured 14 pounds of pressure), Room 254 (measured 14 pounds of pressure), Room 255 (measured 16 pounds of pressure), Room 256 (measured 16 pounds of pressure), Auditorium, two sets of doors, (measured 14 pounds of pressure), Women's Locker Room (measure 17 pounds of pressure), Men's Locker Room (measured 15 pounds of pressure), Women's Restroom by the Gym hallway (measured 20 pounds of pressure), Men's Restroom by the Gym hallway (measured 20 pounds of pressure). (1991 ADA Standards, 28 CFR Part 36, 4.13.11 Door Opening Force) | | | | |
| 7. | Door opening force exceeds the maximum allowable pressure of five pounds to Room 156 (measured 23 pounds of pressure), Room 157 (measured 24 pounds of pressure), Room 159 (measured 17 pounds of pressure), Room 160 (measured 22 pounds of pressure), Room 165 (measured 14 pounds of pressure), Room 169 (measured 20 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | The district has completed the work of adjusting the door force to be compliant with the 2010 ADA standards. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 8. | Sink exceeds the maximum height of 34 inches above the finish floor in Room 140, Demonstration Area, (measured 35 1/2 inches at the bottom and 36 1/4 inches at the top). (1991 ADA Standards, 28 CFR Part 36, 4.24 Sinks, 4.24.2 Height) | The sink meets accessibility requirements | David Moffat | 9/18/19 | Photographic evidence will be provided |
| 9. | Drinking fountain pressure exceeds the maximum allowable pressure of 5 pounds of pressure in the Art Hallway (measured 15 pounds of pressure), Attendance Area | Drinking fountain pressure has been adjusted | David Moffat | 8/31/19 | Photographic evidence will be provided |


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| | (measured 10 pounds of pressure). (1991 ADA Standards, 28 CFR Part 36, 4.15 Drinking Fountains and Water Coolers, 4.27.4 Operation) | | | | |
| 10. | Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 159 (measured 56 inches), Room 160 (measured 45 inches), Room 169 (measured 43 1/4 inches). (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) | Bethel SD will complete necessary adjustments of the listed eyewash station spout to required level. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 11. | Emergency shower handle height exceeds the maximum allowable height of 48 inches in Room 154 (measured 53 inches). (1991 ADA Standards, 28 CFR Part 36, 4.2 Space Allowance and Reach Ranges, 4.2.5 Forward Reach) | Bethel SD will complete necessary adjustments to emergency shower handle height to 2010 ADA standards. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 12. | Emergency shower handle height exceeds the maximum allowable height of 48 inches in Room 157 (measured 52 inches), Room 158 (measured 53 inches). (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2) | Bethel SD will complete necessary adjustments to the emergency shower handles height to 2010 ADA standards. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 13. | Soap dispenser exceeds the maximum allowable height of 48 inches in Room 148, has five dispensers, (measured 55 inches). (1991 ADA Standards, 28 CFR Part 36, 4.27 Controls and Operating Mechanisms, 4.27.3 Height, 4.2.5 Forward Reach) | Bethel SD will complete necessary adjustments to the listed soap dispensers height to meet 2010 ADA standards. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 14. | Paper towel dispenser exceeds the maximum allowable height of 48 inches in Room 122E (measured 60 1/2 inches), Room 140 (measured 50 1/2 inches), Room 142 (measured 49 1/2 inches), Room 154 (measured 49 1/2 inches), Student Store (measured 49 inches), Portable 3 (measured 49 inches), Restroom 155 (measured 51 inches), Women's First Floor Staff Restroom (measured 50 inches), Men's First Floor Staff Restroom (measured 50 inches). (1991 ADA Standards, 28 CFR Part 36, 4.27 Controls and Operating Mechanisms, 4.27.3 Height, 4.2.5 Forward Reach) | Bethel SD will complete necessary adjustments to the listed paper towel dispensers to 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 15. | Paper towel dispenser exceeds the maximum allowable height of 48 inches from the floor ground in Room 156, has six dispensers, (measured 52 inches), Room 157 (measured 63 inches), Room 159 (measured 47 inches), Room 160, has three dispensers, (measured 52 inches), Room 165, has two dispensers, (measured 51 inches) and (measured 52 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | Bethel SD will complete necessary adjustments to the listed paper towel dispensers to 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 16. | Coat hook height exceeds the maximum allowable height of 48 inches above the floor ground in the Women's Locker Room, accessible stall, (measured 55 1/2 inches), Men's Locker Room, accessible stall, (measured 57 inches), Women's Restroom outside of Gym, accessible stall, (measured 52 1/4 inches), Women's Restroom outside of Gym, ambulatory stall, (measured 63 3/4 inches), Men's Restroom outside of Gym, accessible stall, (measured 54 1/2 inches), Women's Restroom by the Gym hallway, accessible stall, (measured 54 inches), Women's Restroom by the Gym hallway, ambulatory stall, (measured 65 1/2 inches), Men's Restroom by the Gym hallway, accessible stall, (measured 54 inches), Men's Restroom by the Gym hallway, ambulatory stall, (measured 66 inches), Restroom 155 (measured 65 inches), Women's Restroom across from Room 152, accessible stall, (measured 67 inches), Men's Restroom across from the Auditorium, accessible stall, (measured 51 inches). (1991 ADA Standards, 28 CFR Part 36, 4.27 Controls and Operating Mechanisms, 4.27.3 Height, 4.2.5 Forward Reach) | Bethel SD will complete necessary adjustments to the listed coat hooks to the maximum of 48 inches above the ground floor. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 17. | The drinking fountains in the Art Hallway (measured 12 and 18 inches from the wall), Attendance Area (measured 13 inches from the wall), by Practice Room (measured 19 inches from the wall), Room 122D Area (measured 18 inches from the wall), Women's Locker Room | Bethel SD will complete necessary adjustments for the listed railings and/or fixtures provided on both sides of drinking fountains that meet 2010 ADA Standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | (measured 18 inches from the wall), Men's Locker Room (measured 18 inches from the wall). Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (1991 ADA Standards, 28 CFR Part 36, 4.4 Protruding Objects, 4.4.1 General, 4.4.2 Head Room). | | | | |
| 18. | AED located outside of the Gym/Concession Area (measured 8 inches from the wall). Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (1991 ADA Standards, 28 CFR Part 36, 4.4 Protruding Objects, 4.4.1 General, 4.4.2 Head Room) | The AED will be moved to a compliant location | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 19. | Fire extinguisher in the Women's Locker Room (measured 6 3/4 inches from the wall). Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (1991 ADA Standards, 28 CFR Part 36, 4.4 Protruding Objects, 4.4.1 General, 4.4.2 Head Room) | Compliance protrusion will be added to provide appropriate cane sweep of no more than 28" in height. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 20. | Weight Room, Room 146, has a 2 1/4 inch lift on 6 platforms and a 3 inch lift on 3 platforms, which exceeds the maximum amount of 1/4 inch change in level. Ground and floor surfaces along accessible routes shall be stable, firm, and slip-resistant. (1991 ADA Standards, 28 CFR Part 36, 4.5 Ground and Floor Surfaces, 4.5.2 Changes in Level) | - Bethel SD will work with vendor to determine solutions to meet compliance on these weight lifting platforms. - Provide a surface with a change of level 1/4 inch high maximum that is stable, firm, and slip resistance. | David Moffat David Moffat | 8/31/20 8/31/20 | Photographic evidence will be provided |
| 21. | There was no appropriate identification signage with symbols of accessibility on the wall outside of the auditorium. There was no directional | - We will be working with our vendor to determine the best placement of ADA | David Moffat | 1/6/20 | Photographic evidence will be provided |

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| | signage for the accessible route to the accessible seats, designated aisle seats, to the stage and to the elevator. (1991 ADA Standards, 28 CFR Part 36, 4.30 Signage, 4.30.7 Symbols of Accessibility, 4.3 Accessible Route) | signage to be placed on the outside of the auditorium. - Directional signage placed on the accessible route to accessible seats, designated aisle seats, to the stage, and to the elevator. | | | |
| 22. | Portable 8 ramp has slope measurements from the bottom of the ramp to the top (ranging from 7 percent to 8.8 percent), Portable 9 has slope measurements from the bottom of the ramp to the top (ranging from 6.6 percent to 8.9 percent), Portable 11 and 12 has slope measurements from the bottom of the ramp to the top (ranging from 7.3 percent to 8.5 percent), Portable 13 and 14 has slope measurements from the bottom of the ramp to the top (ranging from 8.1 percent to 9.2 percent), Portable 15 has slope measurements from the bottom of the ramp to the top (ranging from 7 percent to 8.9 percent), Portable 17 and 18 has a slope measurements from the bottom of the ramp to the top (ranging from 7.3 percent to 8.5 percent), which exceeds the maximum slope of 1:12 (1991 ADA Standards, 28 CFR Part 36, 4.7 Curb Ramps, 4.8 Ramps, 4.8.2 Slope and Rise) | Bethel SD will work with vendor to make the appropriate accessible ramps provided to meet 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 23. | Main/Visitor/Student Parking Lot has a total of 381 parking spaces. The parking space identification signs were below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. By the office: Accessible (A) parking identification signage, van accessible A1 (measured 36 inches), A2 (measured 36 inches), van accessible A3 (measured 36 inches), and A4 (measured 36 inches). By the fields: A1 (measured 37 inches), A2 (measured 35 inches), A3 (measured 34 1/2 inches), A4 (missing signage). (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification) | - Bethel SD will work with vendor to determine solutions to meet compliance on signage in the main parking lot to be adjusted or replaced to 60 inches minimum above the floor ground to the bottom of each sign. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 24. | Main/Visitor/Student Parking Lot, near the office, has two van accessible parking spaces that both (measured 94 inches wide) which is below | - Bethel SD will work with vendor to determine solutions to meet compliance on the main parking lot accessible aisles | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | the minimum width of 132 inches. There are four accessible (A) parking spaces, by the field, and three of them are below the minimum width of 96 inches. A1 (measured 94 inches), A2 (measured 85 inches), A3 (measured 84 Inches. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.2 Vehicle Spaces) | reconfigured and restriped to 2010 ADA standards. | | | |
| 25. | Staff Parking Lot has a total of 150 parking spaces. The parking space identification signs were below the minimum height requirement of 60 inches above the finish floor or ground surface to the bottom of the sign. Accessible (A) parking identification signage A1 (measured 33 inches), A2 (measured 35 inches), A3 (measured 35 inches), A4 (measured 36 inches), van accessible A5 (measured 35 inches) and A6 (measured 35 inches). (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification) | - Bethel SD will work with vendor to determine solutions to meet compliance in the staff parking lot signs to be adjusted or replaced to meet the 60 inches minimum above the floor ground to the bottom of each sign. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 26. | Staff Parking Lot has six accessible (A) parking spaces, one of which is van accessible. Five of the six accessible parking spaces are below the minimum width of 96 inches for car parking spaces, of which there are four, and 132 inches for the van accessible parking space. A1 (measured 93 inches), A2 (measured 91 Inches), A3 (measured 92 inches), A4 (measured 93 inches), van accessible A5 (measured 94 inches). (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.2 Vehicle Spaces) | - Bethel SD will work with vendor to determine solutions to meet compliance in the staff parking lot accessible parking spaces and access aisles to be reconfigured and restriped to 2010 ADA standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |

Superintendent's Signature: 
 Print Name: Tom Seigel

Date: 10/28/19

Office of Superintendent of Public Instruction
Methods of Administration On-Site Compliance Review
VOLUNTARY COMPLIANCE PLAN

*This **Voluntary Compliance Plan (VCP)** calls for the subrecipient to address the areas found to be deficient and, at a minimum, perform the required corrective action. To complete the Plan: 1) Provide specific corrective action to be completed; 2) Identify the individual(s) responsible to address the issue; 3) Project a targeted completion date for each item listed, and 4) Provide a statement of how completion of each remedy will be reported and verified to State Agency.*

District Name: Bethel School District

Bethel 2: Spanaway Lake High School and Challenger High School

Date of Review: June 7 and June 11, 2018

| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
|---------|--|--|---------------------------|------------------------|--|
| | ADMINISTRATIVE | | | | |
| 1. | <p>Annual Public Notice The Bethel School District did not publish, post or disseminate the annual nondiscrimination statement. The statement was not published in the Bethel Pride or in the appropriate language for communities of national origin with limited English proficiency. As identified, there is a national origin community of Spanish speaking individuals within district boundaries. (Guidelines IV. O.; Title VI (34 CFR § 100.6(d))</p> | <p>The Annual Notification will be published and disseminated prior to the beginning of school and include a brief summary of CTE program offerings, admissions criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. The statement must also include language indicating lack of English language proficiency will not be a barrier to admission and participation in career and technical education programs.</p> <p>As identified, the national origin community of Spanish speaking individuals in the Bethel School District will receive this notification in similar fashion within district boundaries. All other identified communities (if there are others so designated) should</p> | Ron Mayberry | 8/31/20 | <p>PDF copies will be provided in English and Spanish.</p> <p>In addition, links to corrected websites will be provided.</p> |

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| | | <p>receive this notification in their language of national origin as required.</p> <p>The district is to place the Annual Notification in the Bethel Pride, on the district's main website homepage, and on each high school and middle school website homepages.</p> | | | |
| 2. | <p><u>Continuous Nondiscrimination Statement</u> Inconsistent use of the comprehensive continuous nondiscrimination statement (based on a review of materials including district newsletters, bulletins, press releases, brochures, handbooks, school calendars, course catalogs, admissions materials, job announcements, district and high school websites, etc.).</p> <p>There are various versions of what should be the consistent version of the comprehensive continuous nondiscrimination statement.</p> <p>The Bethel School District High School Course Catalog 2017-18 School Year did not include the protected class of sex.</p> <p>The Bethel School District's Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation did not include the protected class of sex nor include person(s) designated to handle inquiries, phone numbers, or addresses.</p> <p>Bethel High School's The Career & Technical Education Marketing Sales & Service brochure did not include person(s) designated to handle inquiries, phone numbers, or addresses. The Bethel School District's Student Calendar 2017-18 and the Bethel School District's Career & College Readiness Career & Technical Education Community Report 2016-17 did not include the address for the</p> | <p>The district should include the consistent comprehensive continuous nondiscrimination statement in the Bethel School District High School Course Catalog, Bethel School District's Work Site Learning Agreement, Work Based Learning Student-Parent-School Agreement to Terms, and Work Site Learning and Plan/Employee Evaluation, Bethel School District's Student Calendar, Bethel School District's Career & College Readiness Career & Technical Education Community Report, Bethel School District's Bullying brochure, Bethel School District's Family and Student Access brochure, Bethel School District's Homeless brochure, Bethel Pride, Employee Safety & Health Handbook, CTE Insider Career & College Readiness Newsletter, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, Intro to Lifetime Fitness, High School and Beyond Plan form, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form, CTE recruitment materials, flyers, brochures, publications, press releases, as well as in an obvious location on each school website, just like it is on the district's website.</p> | Ron Mayberry | 8/31/20 | PDF copies and photos of displays will be provided |

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| <p>Title IX Officer, Section 504 Coordinator, Executive Director for Special Education, Executive Director for Human Resources, Civil Rights Coordinator, and Director of Equity and Achievement.</p> <p>The Bethel School District's Bullying brochure, did not include the address for the Assistant Director of Human Resources or the Executive Director of Special Services.</p> <p>The Bethel School District's Family and Student Access brochure, Bethel School District's Homeless brochure, Bethel Pride, August 2015, Bethel Pride, April 2016, Bethel Pride, November/December 2017, Bethel Pride, January/February 2018, Bethel School District's Career & College Readiness Career & Technical Education, May 2017 did not include the address for the Title IX Officer, Section 504 Coordinator, and Compliance Coordinator for Civil Rights Laws.</p> <p>The comprehensive continuous nondiscrimination statement was not included in the following Bethel School District items:</p> <p>CTE Insider Career & College Readiness Newsletter, November 2017, Statement of Residency, iPad Coverage Program, Student/Parent/Guardian Hold Harmless Agreement for Use of District-Owned Equipment, High School and Beyond Plan form, Career and Technical Education Work Based Learning-Employed (CTW2017) Syllabus, Work Site Program Orientation and Site Qualification form, Employee Orientation to Business form, Work Site Safety Checklist, Work Based Learning Folder Checklist, Work Based Learning Work Site Visit Documentation, Work Based Learning Qualifying Class form.</p> | | | | |
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| | Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106). | | | | |
| | RECRUITMENT | | | | |
| 1. | <p>Based on review of recruitment materials (including course catalog, brochures and marketing materials, staff demographics, plans for the provision of services, samples of materials in other languages, etc.), interviews, and onsite walk-through, the district's service area contains a national origin community of Spanish speaking individuals in Bethel School District with limited English language skills.</p> <p>There were limited publications for Household Application for Free and Reduced-Price Meals, National School Lunch Program/School Breakfast Program Letter to Household (Public Schools), Notice of Eligibility For Free or Reduced-Price Meals, FAFSA, and Emergency Contact published in Spanish. There are publications available in other languages digitally in the Main Office, Career Center and Guidance and Counseling Offices. The majority of the publications were in English.</p> <p>Guidelines (V. E.)</p> | The district will provide and distribute recruitment promotional materials, brochures, pamphlets, scholarships, internships, apprenticeships, industry-based certification and licensure information, transcript requests, course catalog, and other current promotional materials published in Spanish minimally in the Main Office and Career Center and Guidance and Counseling Offices. | Ron Mayberry | 8/31/20 | PDF copies and photos of displays will be provided |

| Findin g | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
|-------------|---|--|---------------------------|------------------------|--|
| | ACCESSIBILITY SPANAWAY LAKE HIGH SCHOOL | | | | |

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| 1. | <p>Door opening force exceeds the maximum allowable pressure of five pounds in the Main Office (measured 9 pounds of pressure), Women's Locker Room (measured 12 pounds of pressure), Men's Locker Room (measured 12 pounds of pressure), Gym (measured 10 pounds of pressure), Weight Room (measured 12 pounds of pressure), Auditorium, Door 1 (measured 11 pounds of pressure), Door 2 (measured 12 pounds of pressure), Women's/ Transgender Restroom in Auditorium Hallway next to Band (measured 12 pounds of pressure), Men's Restroom in Auditorium Hallway next to Band (measured 12 pounds of pressure), Room 104 (measured 12 pounds of pressure), Room 105 (measured 10 pounds of pressure), Room 106 (measured 14 pounds of pressure), Room 107 (measured 8 pounds of pressure), Room 108 (measured 10 pounds of pressure), Room 110 (measured 10 pounds of pressure), Room 111 (measured 11 pounds of pressure), Room 112 (measured 10 pounds of pressure), Room 113 (measured 12 pounds of pressure), Room 114 (measured 10 pounds of pressure), Room 115 (measured 10 pounds of pressure), Room 117 (measured 18 pounds of pressure), Room 119 (measured 15 pounds of pressure), Room 120 (measured 15 pounds of pressure), Room 122 (measured 14 pounds of pressure), Room 123 (measured 14 pounds of pressure), Room 124 (measured 14 pounds of pressure), Room 125 (measured 16 pounds of pressure), Room 127 (measured 22 pounds of pressure), Room 131 (measured 12 pounds of pressure), Room 132 (measured 11 pounds of pressure), Room 133 (measured 10 pounds of pressure), Room 134A (measured 11 pounds of pressure), Restroom across from Room 135 (measured 11 pounds of pressure), Room 201 (measured 22 pounds of pressure), Room 202 (measured 11 pounds of pressure), Room 202A (measured 11 pounds of pressure), Room 203 (measured 14 pounds of pressure), Room 203A (measured 12 pounds of pressure), Room 204</p> | <p>The district is working on completing the work of adjusting the door force to be 5 pounds maximum to be compliant with the 2010 ADA standards.</p> | David Moffat | 8/31/20 | Photographic evidence will be provided |
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| | <p>(measured 25 pounds of pressure), Room 205 (measured 9 pounds of pressure), Room 206 (measured 11 pounds of pressure), Room 207 (measured 13 pounds of pressure), Rom 208 (measured 13 pounds of pressure), Room 209 (measured 24 pounds of pressure), Room 210 (measured 14 pounds of pressure), Room 211 (measured 10 pounds of pressure), Room 211A (measured 10 pounds of pressure), Room 212 (measured 14 pounds of pressure), Room 214 (measured 14 pounds of pressure), Room 215 (measured 11 pounds of pressure), Room 216 (measured 17 pounds of pressure), Room 217 (measured 20 pounds of pressure), Room 218 (measured 17 pounds of pressure), Room 219 (measured 18 pounds of pressure), Room 220 (measured 12 pounds of pressure), Room 221 (measured 15 pounds of pressure), Room 222 (measured 15 pounds of pressure), Room 222A (measured 12 pounds of pressure), Room 223 (measured 14 pounds of pressure), Room 224 (measured 11 pounds of pressure), Room 225 (measured 15 pounds of pressure), Room 226 (measured 15 pounds of pressure), Room 301 (measured 14 pounds of pressure), Room 302 (measured 14 pounds of pressure), Room 306 (measured 15 pounds of pressure), Room 307 (measured 16 pounds of pressure), Room 309 (measured 14 pounds of pressure), Room 310 (measured 16 pounds of pressure), Room 311 (measured 17 pounds of pressure), Room 312 (measured 15 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force)</p> | | | | |
| 2. | <p>The force required to activate the operable parts for the drinking fountain controls exceeds the maximum allowable pressure of five pounds by the Auditorium (measured 7 pounds of pressure), Small Gym (measured 6 pounds of pressure), Room 105, low fountain (measured 6 pounds of pressure), high fountain (measured 8 pounds of pressure), outside of Room 120 (measured 8 pounds of pressure), in hallway by</p> | <p>The district is working on completing the work of adjusting drinking fountain control force to be 5 pounds maximum to be compliant with the 2010 ADA standards.</p> | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | Room 222A, low fountain (measured 20 pounds of pressure), high fountain (measured 11 pounds of pressure), outside of Room 301, low fountain measured (15 pounds of pressure), high fountain (measured (15 pounds of pressure). (2010 ADA Standards, 602 Drinking Fountains, 602.3 Operable Parts, 309 Operable Parts, 309.4 Operation) | | | | |
| 3. | Electronically controlled/automatic faucet did not meet the minimum requirement of remaining open for at least 10 seconds in Restroom near the Counselor Offices, Sink 1, Hot (4 seconds), Cold (measured 4 seconds). (2010 ADA Standards, 606 Lavatories and Sinks, 606.4 Faucets, 309 Operable Parts) | The district is working on completing the work of adjusting the electronically controlled/automatic faucet to remain on the required time of 10 seconds to be compliant with the 2010 ADA Standards. | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 4. | Exposed drain pipes under sinks were located in the Women's Locker Room, Room 120, Room 301, Room 306, Room 311, Room 312. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces) | The district will insulate exposed pipes under lavatories and sinks to protect against contact to be compliant with the 2010 ADA Standards. | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 5. | Paper towel dispenser exceeds the maximum allowable reach range height of 48 inches in Main Office Restroom (measured 50 1/2 inches), Restroom near the Counselor Offices (measured 51 inches), Women's Restroom across from the Gym (measured 50 inches), Women's/Transgender Restroom in Auditorium Hallway next to Band (measured 40 3/4 inches), Men's Restroom in Auditorium Hallway next to Band (measured 50 inches), Women's Restroom near the Security Office, Room 143, (measured 49 inches), Room 104A (measured 49 1/2 inches), Room 105 (measured 51 1/4 inches), Room 119 (measures 57 1/2 inches), Room 120, three sink areas, (ranges measured 50-55 1/4 inches), Room 125 (measured 59 inches), Room 127, six dispensers (measured 58 inches), Room 128 (measured 53 inches), | The district will adjust paper towel dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | Weight Room (measured 62 inches), Room 141 (measured 50 inches), Room 202A, Women's Restroom, Dispenser 1 (measured 50 inches), Dispenser 2 (measured 67 inches), Room 202A, Men's Restroom, (measured 50 inches), Room 301 (measured 54 inches), Women's Restroom outside of Room 310 (measured 49 inches), Men's Restroom outside of Room 310 (measured 50 inches), Room 307 (measured 53 inches), Room 312 (measured 62 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | | | | |
| 6. | Soap dispenser height exceeds the maximum allowable reach range height of 48 inches in Women's Locker Room (measured 51 1/4 inches), Room 120, four sink areas, (measured 58 inches), Room 127, six dispensers (measured 52 inches), Weight Room (measured 50 1/2 inches), Room 128 (measured 50 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | The district will adjust soap dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 7. | Toilet seat covers exceed the maximum reach range height of 48 inches in the Restroom by Room 310 (measured 55 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General). | The district will adjust toilet seat cover height to be located within the reach ranges specified in 308. Locate the toilet seat cover so it is conveniently usable, typically 40-48 inches, in the restroom (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General). | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 8. | Mirror exceeds the maximum height of 40 inches above the floor ground to the bottom edge of the reflecting surface in Room 141 (measured 41 3/4 inches), Women's Restroom by Room 143 (measured 42 1/2 inches), Restroom by Room 310 (measured 44 inches). (2010 ADA Standards, 603.3 Mirrors) | The district will adjust mirror to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors) | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 9. | Emergency fire blanket height exceeds the maximum allowable reach range height of 48 inches in Room 120 (measured 63 1/4 inches), Room 122, on top shelf, (measured 67 1/4 inches), Room 124 (measured 73 1/2 inches), Room 128 (measured 60 1/2 inches). (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | The district will adjust fire blanket height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 10. | Coat hook height exceeds the maximum allowable height of 48 inches above the floor ground in the Women's Restroom outside of Room 301 (measured 66 inches). (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) | The district will provide coat hook to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 11. | There was no appropriate identification signage with braille on the wall outside of Room 213. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters) | The district will work with a vendor to provide signage on the outside Room 213, both visual and tactile characters are required. Raised characters shall be duplicated in braille complying with 703.3. Characters shall be uppercase, 5/8 inch minimum height and 2 inches maximum based on the height of the uppercase letter "I". (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters) | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 12. | There is no portable showerhead (measured 71 1/2 inches) in the accessible shower stall in the Women's Locker Room. (2010 ADA Standards, 608.5 Controls, 308 Reach Ranges, 309 Operable Parts) | The district will provide accessible shower controls that are no higher than 48 inches above the floor ground. (2010 ADA Standards, 608.5 Controls, 308 Reach Ranges, 309 Operable Parts) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 13. | Eyewash station spout heights exceed the maximum allowable height of 36 inches in Room 120 (measured 42 1/2 inches), Room 122 (measured 42 1/4 inches), tag with no dates, Room 125 (measured 39 inches), Room 127 (measured 43 inches), Room 128 (measured 43 inches), Room 306 (measured 42 inches), Room 307 (measured 42 inches), Room 312 (measured 42 inches). (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) | The district will provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| 14. | Emergency shower handle exceeds the maximum allowable reach range height of 48 inches in Room 122 (measured 68 1/2 inches), Room 125 (measured 68 inches), Room 127 (measured 62 1/2 inches), Room 128 (measured 68 3/4 inches), Room 301 (measured 68 inches), Room 306 (measured 69 inches). (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2) | The district will provide an accessible emergency shower handle with a maximum height of 48 inches. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 15. | Sink/counter exceeds the maximum height of 34 inches above the finish floor in Room 309 (measured 36 inches at the top). (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height) | The district will provide accessible sink that shall be installed with the front of the higher of the rim or counter surface 34 inches maximum above the finish floor or ground (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 16. | Lab station/counter top height exceeds the maximum allowable height of 34 inches in Room 306 (measured 39 inches), Room 312 (measured 38 inches). (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter) | The district will provide an accessible counter that measures a maximum allowable height of 28 to 34 inches. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 17. | Student workstations/worktables, desks, lab station heights don't allow for proper knee clearance of a least 27 inches high, 30 inches wide, and 19 inches deep, and need to be at an accessible height of 28 inches minimum and 34 inches maximum above the floor in Room 100C (measured 26 3/4 inches at the bottom and 28 inches at the top), Room 107 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 108 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 110 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 111 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 112 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 113 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 114 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 115 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 116 (measured 26 1/2 inches at the bottom and 29 | The district will provide accessible student workstations/ work tables/computer tables/lab stations providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | Ron Mayberry | 4/15/20 | Photographic evidence will be provided |

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| | <p>inches at the top), Room 117 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 119 (measured 26 inches at the bottom and 29 inches at the top), Room 120 (measured 26 inches at the bottom and 29 1/8 inches at the top), Room 121 (measured 26 inches at the bottom and 29 inches at the top), Room 126 (measured 26 inches at the bottom and 29 inches at the top), 128 (measured 26 inches at the bottom and 29 1/8 inches at the top), Room 128 (measured 26 inches at the bottom and 29 1/8 inches at the top), Room 131 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 132 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 135 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 139 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 140 (measured 26 1/2 inches at the bottom and 29 inches at the top), Room 141 (measured 26 1/2 inches at the bottom and 29 inches at the top). (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> | | | | |
| 18. | <p>Desk layout, desk width distance from one desk to another and aisles are not accessible in Room 106 (measured 26 inches), Room 107 (measured 31 inches), Room 110 (measured 29 inches) Room 114 (ranges measured 11-23 inches), Room 115 (ranges measured 20 3/4-24 inches), Room 116 (measured 20 inches), Room 120, in the front of the room, (measured 30 inches), Room 142 (ranges measured 19 3/4 inches near metal book structure to 27 inches), Room 217 (ranges measured 30-39 inches), Room 223 (measured 27 inches). (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces,</p> | <p>The district will demonstrate the room can be arranged in such a way to provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height)</p> | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |

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| | 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | | | | |
| 19. | AED located by Heritage Hall and the Library (measured 8 1/4 inches from the wall, 51 1/2 inches at the bottom, 68 3/4 inches at the top); AED located in the Gym (measured 7 1/2 inches from the wall, 36 1/2 inches to the bottom, 63 3/4 inches to the top); Control panel in the Gym (measured 7 1/2 inches from the wall, 43 7/8 inches to the bottom, 64 inches to the top); Fire extinguisher in the Gym (measured 7 1/2 inches from the wall, 36 3/4 inches to the bottom, 63 3/4 inches to the top); Fire alarm cage in the Small Gym (measured 6 1/2 inches from the wall, 75 1/8 inches to the bottom, 82 1/4 inches at the top); Fire extinguisher outside the Men's Locker Room (measured 7 1/2 inches from the wall, 36 1/4 inches to the bottom, 63 3/4 inches to the top); Fire extinguisher outside the Women's Locker Room (measured (measured 7 1/2 inches from the wall, 36 1/4 inches to the bottom, 63 3/4 inches to the top). Objects projecting from walls with their leading edges between 27 inches and 80 inches above the finished floor shall protrude no more than 4 inches into walk, halls, corridors, passageways, or aisles. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. (2010 ADA Standards, 307 Protruding Objects) | The district will add railing alongside of the AED, fire extinguisher, or fixtures, e.g. magazine racks, seating cubes, plants, with leading edges below 27 inches and not more than 80 inches above the finish floor ground that do not protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 20. | Weight Room, has a 3-inch change in level at three weight stations, which exceeds the maximum amount of a 1/2 inch vertical change in level. Ground and floor surfaces along accessible routes shall be stable, firm, and slip-resistant. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) | - Bethel SD will work with vendor to determine solutions to meet compliance on these weight lifting platforms. - Provide a surface with a change of level 1/4 inch high maximum that is stable, firm, and slip resistance. | David Moffat David Moffat | 8/31/20 8/31/20 | Photographic evidence will be provided |
| 21. | Auditorium has a total of 328 seats. Three platform areas are designated as wheelchair seating. There is signage indicating accessible seating, however, the seats are not accessible. The minimum requirement is six wheelchair spaces. There are no designated companion | The district will provide wheelchair spaces and companion seats that shall be located on an accessible route that also serves as means of emergency egress, and designated aisle seats, identified with a sign or marker, with appropriate lines of sight. | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | seats equivalent in size, quality, comfort, and amenities to the seating in the immediate area. (2010 ADA Standards, 221 Assembly Areas, 221.3 Companion Seats, 703 Signs, 802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats, 802.3 Companion Seats) | The minimum number of required wheelchair spaces is six and the minimum required companion seats is six. Provide appropriate directional signage with the International Symbol for Accessibility indicating where the designated accessible seating is located and in the designated accessible seating areas. (2010 ADA Standards, 221 Assembly Areas, 221.3 Companion Seats, 703 Signs, 802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats, 802.3 Companion Seats) | | | |
| 22. | Auditorium ramps exceed the maximum slope of 1:12 or 8.33 percent. Ramp 1 had an incline slope of 27.5 at the beginning of the ramp to the stage. Ramp 2, left of stage, had incline slope ranges from 12.1 percent to 14.2 percent. Ramp 2, right of stage, had incline slope ranges from 13.1 percent to 16.9 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise) | The district will provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 23. | Ramp to the Shop, Room 301, exceeds the maximum slope of 1:12 or 8.33 percent. Slope ranges from 6.3 percent to 9.2 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise) | The district will provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 24. | Front of School/Student Parking Lot 1 has a total of 126 parking spaces. The total number of accessible parking spaces is three, one of which is van accessible. The required number of accessible parking is five. (2010 ADA Standards, 208 Parking Spaces, 208.2 Mini-mum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking) | Parking Lot 1 has 116 spaces resulting in the need for a total 5 accessible parking spaces. The district will provide three additional accessible parking spaces. Car parking spaces shall be 96 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 25. | Front of School/Student Parking Lot 1 has three designated accessible (A) parking spaces and two access aisles. Accessible parking space | The district will restripe the parking lot where the accessible parking spaces are located to include two additional access | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | width for A1 (measured 91 inches) and A2 (measured 92 inches) which is below the minimum required width of 96 inches. Access aisle 1 (measured 56 inches), which is below the minimum required width of 60 inches, is between accessible parking spaces A1 and A2. Van accessible parking space width for A3 (measured 102 inches) which is under the minimum required width of 132 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | aisles. Car parking spaces shall be 96 inches wide minimum and van parking spaces shall be 132 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | | | |
| 26. | Front of School/Student Parking Lot 1 has three signs identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 53 1/2 inches), Sign 2 (measured 57 1/2 inches), and Sign 3, van accessible, (measured 59 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | The district will provide two additional signs to meet the requirement and adjust existing identification signs to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 27. | Student Parking Lot 2 has a total of 107 parking spaces. The total number of accessible parking spaces is two. The required number of accessible parking is four. (2010 ADA Standards, 208 Parking Spaces, 208.2 Mini-mum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking) | Parking Lot 2 has 94 parking spaces resulting in the need for a total of 4 accessible parking spaces. The district will provide two additional accessible parking spaces. Car parking spaces shall be 96 inches wide minimum and shall have an adjacent access aisle of 60 inches wide minimum. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2 Minimum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 28. | Student Parking Lot 2 has two designated accessible (A) parking spaces and one access aisle. Accessible parking space width for A1 (measured 92 inches) which is below the minimum required width of 96 inches. Access aisle 1 (measured 56 inches), which is below the minimum required width of 60 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 | The district will restripe the parking lot where the accessible parking spaces are located to include two additional access aisles. Car parking spaces shall be 96 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | | | |
| 29. | Student Parking Lot 2 has one identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 59 3/4 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | The district will provide two additional signs to meet the requirement and adjust existing identification sign to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 30. | Staff Parking Lot 1 has a total of 83 parking spaces. The total number of required accessible parking spaces is four. However, the required accessible parking spaces from Staff Parking Lot 1 were added to Staff Parking Lot 2 (three accessible parking spaces added), and Staff Parking Lot 3/Next to Bus Loop one accessible parking space added) in order to be on the shortest accessible route and entrance to the building. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces) | The combined total parking spots in Staff Parking 1 & 2 is 90 (83+7). Parking lot 2 provides ideal access to the building with a clearly marked entrance. There are a total of four accessible parking spots meeting the minimum requirement. Parking spaces that shall be located on the shortest accessible route from parking to an accessible entrance. (2010 ADA Standards, 208 Parking Spaces, 208.3 Location, 502 Parking Spaces) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 31. | Staff Parking Lot 2 has a total of seven parking spaces. The total number of required accessible parking spaces is one. Three accessible parking spaces were added from the required number in Student Parking Lot 1 to Staff Parking Lot 2 in order to provide parking to be on the shortest accessible route from parking to an accessible entrance. Accessible parking space width for A1 (measured 93 1/2 inches), A2 (measured 93 inches) and A3 (measured 91 1/2 inches) which is below the minimum required width of 96 inches. Access aisle 1 (measured 55 inches), which is below the minimum required width of 60 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | The district will restripe the parking lot where the accessible parking spaces are located. Car parking spaces shall be 96 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 32. | Staff Parking Lot 2 has four identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 55 1/2 inches), Sign 2 (measured 56 inches), Sign 3 (measured 57 inches), Sign 4 | The district will adjust existing identification signage to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | David Moffat | 8/31/20 | Photographic evidence will be provided |

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| | (measured 57 1/2 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | | | | |
| 33. | Staff Parking Lot 3 has a total number of 23 parking spaces. The total number of required accessible parking spaces is one. One accessible parking space was added from the required number in Student Parking Lot 1 to Staff Parking Lot 3 in order to provide parking to be on the shortest accessible route from parking to an accessible entrance. Accessible parking space width for A1 (measured 92 1/2 inches), which is below the minimum required width of 96 inches. Access aisle 1 (measured 56 inches), which is below the minimum required width of 60 inches. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | The district will restripe the parking lot where the accessible parking spaces are located. Car parking spaces shall be 96 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 34. | Staff Parking Lot 3 has two identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 59 inches) and Sign 2 (measured 57 1/4 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | The district will adjust existing identification signage to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible parking spaces. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | David Moffat | 8/31/20 | Photographic evidence will be provided |

| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
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| | ACCESSIBILITY CHALLENGER HIGH SCHOOL | | | | |
| | <p>Since the evaluation of the Challenger High School, the Bethel School Board approved an expenditure to begin the replacement of all the Challenger High School portables with a permanent building. Phase I, an 8,000 square foot building will be completed in December of 2019 and occupied in January 2020. This phase includes a significant improvement to pedestrian access to the campus. School staff will move into the new building along with the Art, Science and PE programs resulting in the vacation of their current portables. There are no plans to continue use of those portables; they will be vacated until the planned demolition of all portables in 2023.</p> <p>The final phase, funded by the voter approved 2019 bond, will begin design the spring of 2020 with occupancy expected in 2023. Phase 2 includes an addition to the Phase 1 building resulting in a combined total of approximately 35,000 square feet. In addition to the building expansion in Phase 2 the entire site circulation for pedestrians and vehicles will be improved. At that time, all of the existing portables will be demolished. Therefore, all ADA compliance issues will be 100% resolved.</p> <p>The District would request that any significant expenditures trying to bring the existing portables into compliance be waived as the school will be demolished within the next 3 years.</p> | | | | |
| 1. | There was no appropriate identification signage on the walls outside of Portable C1, Portable D1, Portable D2, Portable N1. (ANSI, 5.11 Identification) | The district will provide signage on the wall outside of the portables indicated, both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility) | David Moffat | 1/6/20 | Photographic evidence will be provided |
| 2. | Counter top height exceeds the maximum allowable height of 34 inches in Portable A (measured 41 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will replace Portable A in Phase 2 of the rebuilding of Challenger High School | Ron Mayberry | 8/31/23 | Photographic evidence will be provided |
| 3. | Counter top height exceeds the maximum allowable height of 28 to 34 inches in Portable P (measured 42 inches). (UFAS, 4.32 Seating, | The district will replace Portable P in Phase 2 of the rebuilding of Challenger High School | Ron Mayberry | 8/31/23 | Photographic evidence will be provided |

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| | Tables and Work Stations, 4.32.4 Height of Work Surfaces, 4.34.6.4 Work Surfaces) | | | | |
| 4. | Sink and counter top height exceeds the maximum allowable height of a horizontal working table (28 ½ inches to 33 ½ inches) and does not allow for a forward approach in Portable M (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will replace Portable M in Phase 2 of the rebuilding of Challenger High School | Ron Mayberry | 8/31/23 | Photographic evidence will be provided |
| 5. | Sink, food prep area, is not accessible to and usable for individuals with disabilities in Portable M (measured 21 7/8 inches from the ground floor and 37 3/4 inches at the top) doesn't allow for a forward approach or for knee clearance under the sink of 27 inches minimum above the floor ground. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will replace Portable M in Phase 2 of the rebuilding of Challenger High School | Ron Mayberry | 8/31/23 | Photographic evidence will be provided |
| 6. | Eyewash station spout heights exceed the maximum allowable height of 36 inches in Portable N2 (measured 39 inches). (ANSI, 5.7 Water Fountains, 5.7.2) | The district will place an ADA portable wall mounted saline eyewash in Portable N2. | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 7. | The drinking fountain spout is not accessible for individuals with disabilities in the Courtyard (measured 36 1/4 inches) along with the pressure to operate (measured 9 pounds of pressure). (ANSI, 2.13 Appropriate Number, 5.7 Water Fountains) | This water fountain has been disconnected for all use due to repetitive freeze breakage over decades. | Ron Mayberry | 1/6/20 | Photographic evidence will be provided |
| 8. | Desk layout, desk width distance from one desk to another and aisles are not accessible and do not allow program access in Portable B (measured 27 inches) or in Portable J (ranges measured 12-17 inches). (ANSI, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will demonstrate the room can be arranged in such a way to provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work | Ron Mayberry | 1/7/20 | Photographic evidence will be provided |

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| | | Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | | | |
| 9. | The current door to Portable J2 has an 1 1/4 inch change in level at the doorsill that could prevent the use of the door by the physically disabled. (ANSI, 5.2 Entrances, 5.2.1, 5.3 Doors and Doorways, 5.3.3) | The district will provide a ground surface that is stable, firm, and slip-resistant. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 10. | The setting of the door closers, door opening force, exceeds the maximum allowable pressure to be operable by a single effort to Portable C1 (measured 15 pounds of pressure), Portable D1 (measured 20 pound of pressure), Portable D2 (measured 25 pounds of pressure), Portable E2 (measured 15 pounds of pressure), Portable K (measured 15 pounds of pressure), Portable N (measured 10 pounds of pressure) and could prevent the use of the door by the physically disabled. At least one primary entrance to each building shall be usable by individuals in a wheelchair. (ANSI, 5.2.1, 5.3 Doors and Doorways, Note 1, Note 2, Note 3: Specifications apply both to exterior and interior doors and doorways.) | The district will reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 11. | AED located in the Portable A, Main Office, (measured 6 inches from the wall) and the shredder cabinet (measured 19 inches from the wall); shelf by door in Portable D1 (measured 12 inches from the wall); fire extinguisher in Portable M (measured 4 1/2 inches from the wall) and protrude into the hallway. Every effort shall be made to remove hazards to individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair), 5.7 Water Fountains) | <ul style="list-style-type: none"> - The district will add a rail under the AED located in Portable A will be made - Portable D1 will be closed January 2020 as phase 1 opens for the new Challenger HS. - The district will add a rail under the fire extinguisher in portable M | <p>David Moffat</p> <p>Ron Mayberry</p> <p>David Moffat</p> | <p>4/15/20</p> <p>1/31/20</p> <p>4/15/19</p> | Photographic evidence will be provided |

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| 12. | Drain pipes were not covered or insulated so that a wheelchair individual without sensation could burn themselves under the sinks in Portable E, Portable L, Women's Restroom and Men's Restroom, Portable N1, Restroom. (ANSI, 5.6 Toilet Rooms, 5.6.3) | The district will insulate exposed pipes under lavatories and sinks to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces) | David Moffat | 1/7/20 | Photographic evidence will be provided |
| 13. | Soap dispenser exceeds the maximum allowable height of 40 inches from the floor ground in Portable N1 (measured 51 1/4 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will adjust soap dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 14. | Paper towel dispenser exceeds the maximum allowable height of 40 inches from the floor ground in Portable E2 (measured 57 inches), Portable L, Women's Restroom, (measured 58 inches), Portable M (measured 59 1/2 inches), Portable N1 (measured 58 5/8 inches), Portable N2 (measured 58 5/8 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will adjust paper towel dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.36 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 15. | Paper towel dispenser exceeds the maximum high forward reach allowable height of 48 inches and the maximum high side reach allowed in Portable P (measured 55 inches). (UFAS, 4.2 Space Allowance and Reach Ranges, 4.2.5 Forward Reach, 4.2.6 Side Reach) | The district will adjust paper towel dispensers to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 16. | There are no handles on the designated accessible stalls, making them inaccessible to individuals with disabilities, in Portable E, Women's Restroom and Men's Restroom. (ANSI, 5.6 Toilet Rooms, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will provide handles on the designated accessible stalls in Portable E, Women's and Men's Restrooms that are within reach ranges and will be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. (2010 ADA Requirements, 308 Reach Ranges, 309 Operable Parts, 309.3 Height, 309.4 Operation, 404 Doors, Door-ways, and Gates, 404.2.7 Door and Gate Hardware) | David Moffat | 4/15/20 | Photographic evidence will be provided |

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| 17. | Toilet seat cover dispensers exceed the maximum allowable height of 40 inches from the floor ground in Portable E, Women's Restroom (measured 50 inches), Portable E, Men's Restroom (measured 49 inches), Portable L, Women's Restroom accessible staff (measured 57 inches), Portable N1, Restroom accessible stall (measured 57 1/2 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will adjust toilet seat cover dispenser to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.36 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 18. | Toilet seat cover dispenser exceeds the maximum allowable height of 48 inches in Portable P (measured 56 inches). (UFAS, 4.2 Space Allowance and Reach Ranges, 4.2.5 Forward Reach, 4.2.6 Side Reach) | The district will adjust toilet seat cover to be located within the reach ranges specified in 308, 48 inches maximum from the finish floor or ground. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 19. | Coat hook heights exceed the maximum allowable height of 40 inches above the floor ground in the Portable E, Women's Restroom (measured 67 inches), Portable E, Men's Restroom (measured 68 inches), Portable L, Women's Restroom accessible staff (measured 75 and 77 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will provide coat hooks to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 20. | Mirror exceeds the maximum allowable height of 40 inches above the floor ground, measured from the top of the shelf and the bottom of the mirror, in Portable N restroom (measured 49 7/8 inches). (ANSI, 5.6 Toilet Rooms, 5.6.4) | The district will adjust mirror to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors) | David Moffat | 4/15/20 | Photographic evidence will be provided |
| 21. | Restrooms in Portable M have clear openings that are less than 32 inches wide. The closest accessible restroom is 225 feet by Campus Security or the Student Union. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 5.3 Doors and Doorways, 5.6 Toilet Rooms) | These buildings are being removed from service at the completion of Phase 2. Interim measure to place directional signage to accessible restrooms in new phase 1 building opening in January 2020. | David Moffat | 1/31/20 | Photographic evidence will be provided |

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| 22. | First Aid Kit height (measured 57 inches) in the Portable M is not accessible to individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | The district will provide First Aid Kit to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges) | David Moffat | 1/7/20 | Photographic evidence will be provided |
| 23. | The concrete public walk from Main Office to the Courtyard is outside in the elements and transitions to gravel where all the tables are located which doesn't allow for the area to be readily accessible for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 4.2 Walks) | This area is being removed from service at the completion of Phase 2. | Ron Mayberry | 8/31/20 | Photographic evidence will be provided |
| 24. | Ramp to Portable L as you veer to the left of LSA, walking surface has a significant change in level as it just ends with a huge drop off, over 24 inches, with no handrails. This is safety issue for students, not just for those individuals with disabilities. (ANSI, Chapter 5 Buildings, 5.1 Ramps with Gradients, 5.1.1) | The district will provide a barrier closing off the access to the open ramp space connected to portable L (2010 ADA Standards, 405 Ramps, 505 Handrails, 505.4 Height). | David Moffat | 1/6/19 | Photographic evidence will be provided |
| 25. | Ramp to Portable N (had measurements ranging from 6.7 percent to 8.5 percent) exceeds the maximum slope of 1:12. (ANSI, Chapter 5 Buildings, 5.1 Ramps with Gradients, 5.1.1) | The district will replace Portable N in Phase 2 of the rebuilding of Challenger High School | David Moffat | 8/31/20 | Photographic evidence will be provided |
| 26. | Main Parking Lot has a total number of 66 parking spaces. The total number of accessible spaces is two, one of which is identified as van accessible. The minimum required number of accessible parking spaces is three. (2010 ADA Standards, 208 Parking Spaces, 208.2 Mini-mum Number, 502 Parking Spaces, 502.2 Vehicle Spaces, 502.3 Access Aisle, 502.3.3 Marking) | Parking at the school is evolving during the various phases of the school construction. - Three compliant parking spaces with compliant signage was added October 2019 | Ron Mayberry | 11/1/19 | Photographic evidence will be provided |
| 27. | Main Parking Lot has two identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 39 1/2 inches) and Sign 2 (measured 29 1/2 inches). (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | Signage will be adjusted to meet the minimum 60 inch requirement. | David Moffat | 1/15/20 | Photographic evidence will be provided |

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| 28. | Staff/Bethel Family Center Parking Lot has a total number of 30 parking spaces. There are three, two are required, designated accessible (A) parking spaces, A1 is accessible, and two access aisles. Accessible parking space width for A2 (measured 89 1/2 inches) and A3 (measured 89 inches) which is below the minimum required width of 96 inches. (2010 ADA Standards, 208 Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | This parking has been removed. Signage will be added directing patrons to 3 new accessible parking spaces added to the west side of the building. | Ron Mayberry | 1/15/20 | Photographic evidence will be provided |
| 29. | Staff/Bethel Family Center Parking Lot has two identifying accessible parking spaces that measured below the minimum height of 60 inches from the ground to the bottom of the sign. Sign 1 (measured 31 inches) and Sign 2 (measured 33 inches). One sign is missing. (2010 ADA Standards, 502 Parking Spaces, 502.6 Identification) | This parking has been removed. Signage will be added directing patrons to 3 new accessible parking spaces added to the west side of the building. | Ron Mayberry | 1/15/20 | Photographic evidence will be provided |

Superintendent's Signature: 

Date: 11-19-19

Print Name: Thomas G. Seigel

Office of Superintendent of Public Instruction
Methods of Administration On-Site Compliance Review
VOLUNTARY COMPLIANCE PLAN

*This **Voluntary Compliance Plan (VCP)** calls for the subrecipient to address the areas found to be deficient and, at a minimum, perform the required corrective action. To complete the Plan: 1) Provide specific corrective action to be completed; 2) Identify the individual(s) responsible to address the issue; 3) Project a targeted completion date for each item listed, and 4) Provide a statement of how completion of each remedy will be reported and verified to State Agency.*

District Name: Selah School District

Visited Schools: Selah High School and Selah Academy

Date of Review: January 23-25, 2019

| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
|---------|---|--|--|--|--|
| | ADMINISTRATIVE | | | | |
| 1. | <p><u>Annual Public Notice</u></p> <p>The Selah School District did not publish, post or disseminate the annual nondiscrimination statement. The statement was not published in the Selah School District’s newsletter or in the appropriate language for communities of national origin with limited English proficiency. As identified, there is a national origin community of Spanish speaking individuals within district boundaries.</p> <p>(Guidelines IV. O.; Title VI (34 CFR § 100.6(d))</p> | <p>The Annual Notification must be published and disseminated prior to the beginning of school and include a brief summary of CTE program offerings, admissions criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. The statement must also include language indicating lack of English language proficiency will not be a barrier to</p> | <p>Mr. Jeff Cochran (SHS – Assistant Principal / Director of Future Learning)</p> <p>Mrs. Heidi Diener (Public Relations / Human Resources Specialist)</p> | <p>August 2020 (prior to the start of the 2020-2021 school year)</p> | <p>Documentation, photographic evidence, and links</p> |

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| | | <p>admission and participation in career and technical education programs.</p> <p>As identified, the national origin community of Spanish speaking individuals in the Selah School District should receive this notification in similar fashion within district boundaries. All other identified communities (if there are others so designated) should receive this notification in their language of national origin as required.</p> <p>The district is to place the Annual Notification in the Selah School District's newsletter, on the district's main website homepage, and on Selah High School, Selah Academy and Selah Middle School website homepages.</p> | <p>Mr. Greg Sugdan (Director of Technology)</p> <p>Chad Quigley (Executive Director of Human Resources)</p> | | |
| 2. | <p><u>Continuous Nondiscrimination Statement</u></p> <p>The comprehensive continuous nondiscrimination statement was not included in the following Selah School District items:</p> <p>The Selah High School Staff Handbook 2017-18 School Year, Selah High School Student Handbook 2017-18, and the Selah High School Crisis Management Lock Down/Evacuation Procedures 2017-18, 2018-19 Registration Packet for Grade 9, 2018-19 Registration Packet for Grades 10-12, Selah High School Newsletter, October 2016, Selah High School Community Connection, November 2016, Selah High School Newsletter, December 2016, Selah High School Newsletter, February 2016, Selah High School Community Connection, February 2017, Selah High School Newsletter, March 2017, Selah</p> | <p>The district should include the consistent comprehensive continuous nondiscrimination statement in the Selah High School Staff Handbook, Selah High School Student Handbook, and the Selah High School Crisis Management Lock Down/Evacuation Procedures, Registration Packets for Grades 9-12, Selah High School Newsletters, Selah High School Community Connections, Selah High School Activities brochure, Marketing Classes Your Future Starts Now! flyer, Selah High School flyer, Selah What Is DECA? flyer, Selah High School Electives Night flyer, Selah High School DECA Why Join? Flyer, Selah High School Life is Engineering, TSA information packet, What is FCCLA? flyer, Sports Med Club Meeting flyer, Health Sciences Club Meeting flyer, ASL Pah Club flyer, Energize with FFA flyer, Get Up to Speed with FFA</p> | <p>Mr. Jeff Cochran (SHS – Assistant Principal / Director of Future Learning)</p> <p>Mr. Jake Davis (Assistant Principal SHS Safety Lead)</p> <p>Mrs. Becca Thompson (Assistant Principal)</p> | <p>March 2020</p> <p>Ongoing</p> | <p>Documentation, photographic evidence, and links</p> |

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| <p>High School Newsletter, April 2017, Selah High School Newsletter, May 2017, Selah High School Community Connection, May 2017, Selah High School Newsletter, June 2017, Selah High School Community Connection, June 2017, Selah High School Activities brochure, Marketing Classes Your Future Starts Now! Selah High School flyer, Selah What Is DECA? flyer, Selah High School Electives Night flyer, Selah High School DECA Why Join? Flyer, Selah High School Life is Engineering, TSA information packet, What is FCCLA? flyer, Sports Med Club Meeting flyer, Health Sciences Club Meeting flyer, ASL Pah Club flyer, Energize with FFA flyer, Get Up to Speed with FFA flyer, Selah High School 2016-17 presentation, Selah High School 2017-18, Selah Education Foundation presentation, Selah High School to Host Open House for the Class of 2021 flyer, Selah Academy End of October Celebrations Issue, October 28, 2016, Selah Academy November 2016 Celebration Issue, Selah Academy December 2016 Celebrations Issue, Selah Academy January 2017 Celebrations Edition, Selah Academy End of February News/Celebrations, February 28, 2018, Selah Academy March Celebrations/ Awards Issue, March 24, 2017, Selah Academy, April Awards/Celebrations Edition, April 28, 2017, Selah Academy May Awards/Celebrations Edition, May 26, 2017, Selah Academy May/June Awards/ Celebrations Edition, May/June 2017, Selah School District Activities Calendar, Selah School District Community and Work-Based Learning Student Application (Paid/Non-Paid), Selah School District Student Work Record, Work Based Learning form, Selah School District Worksite Learning Student Learning Agreement, Selah School District My Post-High School Plan.</p> | <p>flyer, Selah High School presentations, Selah High School– Selah Education Foundation presentations, Selah High School to Host Open House flyers, Selah Academy Celebrations Issues, Selah School District Activities Calendar, Selah School District Community and Work-Based Learning Student Application (Paid/Non-Paid), Selah School District Student Work Record, Work Based Learning form, Selah School District Worksite Learning Student Learning Agreement, Selah School District My Post-High School Plan, CTE recruitment materials, flyers, brochures, publications, press releases, as well as, in an obvious location on each school website, just like it is on the district’s website.</p> | <p>Mr. Colton Monti (SHS Principal)</p> <p>Mr. Joe Coscart (Alternative Learning Principal)</p> <p>Mrs. Heidi Diener (Public Relations / Human Resources Specialist)</p> | | |
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| | Title VI (34 CFR Part 100.6(d)); Title IX (34 CFR Part 106.9(a) (b)); Section 504 (34 CFR Part 104.8(a) (b)); Title II (28 CFR Part 35.106) | | | | |
| | RECRUITMENT | | | | |
| 1. | <p>Based on review of recruitment materials (including course catalog, brochures and marketing materials, staff demographics, plans for the provision of services, samples of materials in other languages, etc.), interviews, and onsite walk-through, the district's service area contains a national origin community of Spanish speaking individuals in Selah School District with limited English language skills.</p> <p>There were no publications available in Spanish in the Counseling Office.</p> <p>Guidelines (V. E.)</p> | <p>Provide and distribute recruitment promotional materials, brochures to include CTE course offering, pamphlets, scholarships, internships, apprenticeships, industry-based certification and licensure information, transcript requests, course catalog, and other current promotional materials published in Spanish, minimally in the Main Office and Guidance and Counseling Offices.</p> | <p>Mr. Jeff Cochran (SHS – Assistant Principal / Director of Future Learning)</p> | <p>August 2020</p> | <p>Documentation, photographic evidence, and links</p> |

| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
|---------|---|--|--------------------------------------|------------------------|--|
| | ACCESSIBILITY Selah High School | | | | |
| 1. | Door opening force exceeds the maximum allowable pressure to be operable by a single effort to Main Entrance, second door, (measured 10 pounds of pressure), Room 102 (measured 9 pounds of pressure), Room 103 (measured 9 pounds of pressure), Room 104 (measured 15 pounds of pressure), Room 105 (measured 10 pounds of pressure), Room 106 (measured 10 pounds of pressure), Room 206 (measured 10 pounds of pressure), Room 209 (measured 9 pounds of pressure), Room 210 (measured 8 pounds of pressure), Room 213 (measured 10 pounds of pressure), Room 214, Metal Shop Instruction Classroom (measured 9 pounds of pressure), Room 214, Wood Shop (measured 17 pounds of pressure), Room 215 (measured 10 pounds of pressure), Room 216 (measured 10 pounds of pressure), Room 217 (measured 17 pounds of pressure), Room 301 (measured 15 pounds of pressure), Room 306 (measured 12 pounds of pressure), Room 308 (measured 15 pounds of pressure), Counseling Office, from Cafeteria entrance, (measured 12 pounds of pressure), Counseling Office (measured 8 pounds of pressure), Main Office Women's Restroom (measured 10 pounds of pressure), Main Office Men's Restroom (measured 7 pounds of pressure), Women's Basement Restroom | Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |

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| | (measured 15 pounds of pressure), Men's Second Floor Restroom (measured 9 pounds of pressure) Women's Second Floor Restroom (measured 9 pounds of pressure), Girl's Gym (measured 14 pounds of pressure), Girl's Locker Room (measured 9 pounds of pressure), Boy's Locker Room (measured 15 pounds of pressure), Wrestling Room (measured 15 pounds of pressure). (ANSI, 5.3 Doors and Doorways) | | | | |
| 2. | There was no appropriate identification signage on the wall outside to the Men's Basement Restroom indicating there is an accessible restroom. Also, Room 205 indicates teachers name underneath in braille, however, the sign does not indicate it is the Boy's Locker Room. (ANSI, 5.11 Identification) | Provide signage on the outside of the rooms indicated, both visual and tactile characters are required. Pictograms shall have a field height of 6 inches minimum. Characters and braille shall not be located in the pictogram field. Symbols of accessibility and their background shall have a non-glare finish. (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |
| 3. | Health Restroom and Boy's Locker Room, designated accessible stall, is not accessible for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair, Walks 4.2, 4.4.2) | Provide accessible restrooms. (2010 ADA Standards, Chapter 6: Plumbing Elements and Facilities, 603 Toilet and Bathing Rooms, 604 Water Closets and Toilet Compartments, 605 Urinals, 606 Lavatories and Sinks, 609 Grab Bars) | Frank Reno (Maintenance Director) | August 2020 | Documentation and photographic evidence |
| 4. | Drain pipes were not covered or insulated so that a wheelchair individual without sensation could burn themselves under the sinks in the Wood Shop (main area), Main Office Women's Restroom, Main Office Men's Restroom, Men's Basement Restroom, Women's Basement Restroom, Men's Second Floor Restroom, Women's Second Floor Restroom, Boy's Locker Room, Girl's Gym, Girl's Locker Room, Room 212, Metal Shop Men's Restroom, Metal Shop Women's Restroom. (ANSI, 5.6 Toilet Rooms, 5.6.3) | Insulate exposed pipes under lavatories and sinks to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. (2010 ADA Standards, 606 Lavatories and Sinks, 606.5 Exposed Pipes and Surfaces) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |

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| 5. | <p>Paper towel dispenser handle exceeds the maximum allowable height of 40 inches from the floor ground in in Room 206 (measured 54 inches), Room 212 (measured 54 inches), Room 215 (measured 57 inches, no handle), Room 303 (measured 53 inches), Library (measured 16 pounds of pressure), Health Room (measured 53 1/2 inches), Women's Gym Main Office Women's Restroom (measured 53 inches with spindle-type handle), Main Office Men's Restroom (measured 57 inches), Men's Basement Restroom (measured 55 inches), Women's Basement Restroom (measured 57 1/2 inches), Men's Second Floor Restroom (measured 56 inches), Women's Second Floor Restroom (measured 60 inches), Girl's Gym (measured 61 inches), Boy's Locker Room (measured 51 inches), Girl's Locker Room (measured 61 inches), Wrestling Room (measured 73 inches), Metal Shop Area (measured 64 inches), Metal Shop Women's Restroom (measured 61 1/2 inches), Metal Shop Men's Restroom (measured 61 1/2 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>Adjust paper towel dispenser handle height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. Also, provide handles that are within the reach ranges and to be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach, 308.3 Side Reach, 309 Operable Parts, 309.3 Height, 309.4 Operation, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 6. | <p>Soap dispenser exceeds the maximum allowable height of 40 inches from the floor ground in the Main Office Women's Restroom (measured 50 inches), Main Office Men's Restroom (measured 50 inches), Metal Shop Men's Restroom (measured 52 1/2 inches), Metal Shop Women's Restroom (measured 52 1/2 inches), Metal Shop Area (measured 60 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4)</p> | <p>Adjust soap dispenser height to be located within the reach ranges specified in 308. Locate the towel dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General)</p> | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 7. | <p>Sanitary napkin dispenser handle exceeds the maximum allowable height of 40 inches from the floor ground in the Main Office Women's</p> | <p>Adjust sanitary napkin disposal dispenser height to be located within the reach ranges specified in 308. Locate the towel</p> | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |

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| | Restroom (measured 61 inches), Women's Basement Restroom (measured 50 1/2 inches), Women's Second Floor Restroom (measured 54 inches), Girl's Gym (measured 52 1/2 inches), Girl's Locker Room (measured 59 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4) | dispensers so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | | | |
| 8. | Toilet seats in the accessible stalls are below the minimum height of 20 inches in the Main Office Women's Restroom (measured 16 1/2 inches), Main Office Men's Restroom (measured 16 inches), Men's Basement Restroom (measured 16 1/2 inches), Men's Second Floor Restroom (measured 16 inches), Women's Basement Restroom (measured 16 1/2 inches), Women's Second Floor Restroom (measured 16 inches), Girl's Locker Room (measured 16 inches), Girl's Gym (measured 16 inches). (ANSI, 5.6 Toilet Rooms, 5.6.2) | Provide accessible toilet seats (17 to 19 inches from the finish floor) in each location. Seats shall not be sprung to return to a lifted position. (2010 ADA Standards, 604.4 Seats). | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 9. | Toilet seat covers in the accessible stalls exceed the maximum allowable height of 40 inches from the floor ground in the Main Office Women's Restroom (measured 55 inches), Main Office Men's Restroom (measured 55 inches), Men's Second Floor Restroom (measured 53 inches), Women's Second Floor Restroom (measured 57 inches), Girl's Locker Room (measured 53 inches), Room 212 (measured 54 inches). (ANSI, 5.6 Toilet Rooms, 5.6.6, 3.3 The Adult Individual Functioning in a Wheelchair, 3.3.4) | Adjust toilet seat cover height to be located within the reach ranges specified in 308. Locate the toilet seat cover so it is conveniently usable, typically 40-48 inches, in the restroom. (2010 ADA Standards, Reach Ranges 308, 308.2 Forward Reach, 308.3 Side Reach, 606 Lavatories and Sinks, Advisory 606.1 General) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 10. | Mirror exceeds the maximum allowable height of 40 inches above the floor ground to the bottom of the mirror in Room 212 restroom (measured 49 inches). (ANSI, 5.6 Toilet Rooms, 5.6.4) | Adjust mirror to have the bottom edge of the reflecting surface to be 40 inches maximum above the finish floor or ground. (2010 ADA Standards, 603.3 Mirrors) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |
| 11. | Microwave height (measured 54 inches) in Room 212 and is not accessible to and usable for individuals with disabilities. (ANSI, 2.13 | Provide microwave to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |

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| | Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | above the finish floor. (2010 ADA Standards, 308 Reach Ranges) | | | |
| 12. | First Aid Kit height (measured 58 inches) in the Wood Shop is not accessible to and usable for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide First Aid Kit to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 13. | Coat hook height in the accessible stalls makes it not accessible to and usable for individuals with disabilities in the Main Office Women's Restroom (measured 65 inches), and Main Office Men's Restroom (measured 58 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide a coat hook to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |
| 14. | Coat/apron/personal protective equipment hook height makes it not accessible to and usable for individuals with disabilities in Room 303 (measured 65 inches), Metal Shop (measured 76-77 1/2 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide a coat/apron hook to be located within the reach ranges specified in 308, located 40 inches minimum and 48 inches maximum above the finish floor. (2010 ADA Standards, 308 Reach Ranges, Water Closets and Toilet Compartments, 604.8.3 Coat Hooks and Shelves) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 15. | Drinking fountain in the Main Gym (measured 20 inches from the wall), Wood Shop (measured 13 inches from the wall), on the first floor by the Electrical Room (measured 18 inches from the wall), Boy's Locker Room by the coaches office (measured 13 inches from the wall and has a broken handle), Girl's Gym (measured 13 inches from the wall and has a broken handle) protrudes into the hallway. Every effort shall be made to remove hazards | Provide fixtures, e.g. magazine racks, seating cubes, plants, or rails with leading edges below 27 inches and not more than 80 inches above the finish floor ground that do not protrude more than 4 inches maximum horizontally into the circulation path, on both sides of the drinking fountain. (2010 ADA Standards, 307 Protruding Objects) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |

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| | to individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 5.7 Water Fountains) | | | | |
| 16. | Eyewash station spout heights exceed the maximum allowable height of 36 inches in the Metal Shop (measured 46 inches), Wood Shop (measured 45 inches), Room 303 (measured 38 inches). (ANSI, 5.7 Water Fountains, 5.7.2) | Provide eyewash station spouts with a maximum height of 36 inches above the finish floor or ground. (2010 ADA Standards, 602 Drinking Fountains, 602.4 Spout Height, 602.5 Spout Location, 602.6 Water Flow) | Frank Reno (Maintenance Director) | Portable Saline Bottles as an Interim Measure by January 2020 August 2020 | Photographic evidence |
| 17. | Emergency shower handle in the Metal Shop (measured 68 1/2 inches), Wood Shop (measured 69 inches) and is not accessible to and usable for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 5.7 Water Fountains) | Provide an accessible emergency shower handle with a maximum height of 48 inches. (2010 ADA Standards, 308 Reach Ranges, 308.2 Forward Reach 308.2) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 18. | Sink and counter top height exceeds the maximum allowable height of a horizontal working table (28 ½ inches to 33 ½ inches) and does not allow for a forward approach in Room 206 (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide an accessible sink with a forward approach and proper knee clearance of at least 27 inches high and 34 inches maximum above the floor. (2010 ADA Standards, 606 Lavatories and Sinks, 606.3 Height, 306.3 Knee Clearance) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 19. | Sink handles (spindle type) are not accessible for individuals with disabilities in Room 309 (measured 36 inches at the top). (ANSI 2.13 Appropriate Number) | Provide accessible faucet handles that are within reach ranges and will be operable with one hand not requiring tight grasping, pinching, or twisting of the wrist. (2010 ADA Standards, 308 Reach Ranges, 309 | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |

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| | | Operable Parts, 309.3 Height, 309.4 Operation) | | | |
| 20. | Counter top heights do not allow for the program areas to be readily accessible for individuals with disabilities in Room 212 (measured 36 inches), Health Room (measured 36 inches), Room 216 (measured 36 inches), Room 303 (measured 36 inches), Thor Concessions (measured 36 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide accessible counters that are 28 inches minimum and 34 inches maximum above the finish floor ground. (2010 ADA Standards, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height, and 904.3.2 Counter) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 21. | The tables in the Cafeteria (measured 26 inches to the bar at the bottom) and are not accessible to students with disabilities. (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide accessible tables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 22. | The student workstations/worktables are not accessible to students with disabilities in Room 101 (fixed seating), Room 102 (fixed seating), Room 103 (fixed seating, Room 105 (fixed seating), Room 106 (fixed seating), Room 217 (measured 26 inches at the bottom), Room 301 (measured 25 1/2 inches at the bottom), Room 308 (fixed seating), Room 214, Metal Shop Instruction Classroom (measured 23 1/2 inches). (ANSI, 2.13 Appropriate Number, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide accessible student workstations/worktables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 23. | The student worktables (fixed seating) do not allow for proper knee clearance of a least 27 inches high, 30 inches wide, and 19 inches deep, and need to be at an accessible height of 28 inches minimum and 34 inches maximum above the floor in Portable 5 (measured 26 1/4 | Provide accessible student workstations/worktables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |

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| | inches at the bottom) and Portable 6 (measured 26 1/4 inches at the bottom). 1991 ADA Standards, 28 CFR Part 36, 4.32.3 Knee Clearance) | Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | | | |
| 24. | The student worktables exceed the maximum height from 28 inches to 34 inches in the Greenhouse (measured 36 at the top) and are not accessible to individuals with disabilities. (1991 ADA Standards, 28 CFR Part 36, 4.32 Fixed or Built-In Seating and Tables, 4.32.4 Height of Tables or Counters) | Provide accessible student worktables providing for a forward approach and proper knee and toe clearance of at least 27 inches high, 30 inches wide minimum, and 34 inches maximum above the floor. (2010 ADA Standards, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 25. | Desk layout, desk width distance from one desk to another and aisles (measured 24 inches) are not accessible and do not allow program access in Room 101. (ANSI, 3. General Principles and Considerations, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair) | Provide a clear floor or ground space creating accessible aisles on an accessible route in the rooms indicated. (2010 ADA Standards, 402 Accessible Routes, 305 Clear Floor or Ground Space, 403 Walking Surfaces, 306 Knee and Toe Clearance, 306.2 Toe Clearance, 306.3 Knee Clearance, 306.3.5 Width, 902 Dining Surfaces and Work Surfaces, 902.2 Clear Floor and Ground Space, 902.3 Work Surface Height) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 26. | Wrestling Room walking surface and floor has a significant change in level to the mat (two inches) which does not allow for the area to be program accessible for individuals with disabilities. (ANSI, 2.13 Appropriate Number, 4.2 Walks, 5.5 Floors) | Provide an accessible route that has a level ground surface that is stable, firm, and slip resistant. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled, 402 Accessible Routes) | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |

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|-----|---|---|--------------------------------------|-------------|-----------------------|
| 27. | Main Gymnasium has bleachers that are not readily accessible or provide program access (steps too tall and bleachers too steep) for individuals with disabilities. Furthermore, individuals with disabilities are asked to sit on the sideline and then asked again to move due to their not being enough room. This is an exclusionary practice. (ANSI, 2.13 Appropriate Number, 3. General Principles and Considerations, 3.1 Wheelchair Specifications, 3.2 The Functioning of a Wheelchair, 3.3 The Adult Individual Functioning in a Wheelchair, 3.4 The Individual Functioning on Crutches) | Provide bleachers that have wheelchair spaces. (2010 ADA Standards, 221.2.3.2 Vertical Dispersion, 903 Benches) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 28. | Ramp to Portables 5 and 6 (had measurements ranging from 11.1 to 11.9 percent at the top of Incline 2 and measurements ranging from 8.1 to 8.7% at the center of Incline 3) exceeds the maximum slope of 1:12 or 8.33 percent. (1991 ADA Standards, 28 CFR Part 36, 4.8 Ramps, 4.8.4 Landings) | Provide accessible ramps that have slopes that do not exceed 8.33 percent. (2010 ADA Standards, 405 Ramps, 405.2 Slope, 405.6 Rise) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 29. | The greenhouse does not have an accessible route inside and has uneven gravel for flooring. (1991 ADA Standards, 28 CFR Part 36, 4.3 Accessible Route, 4.3.2 Location, 4.3.8 Changes in Levels, 4.5 Ground and Floor Surfaces) | Provide an accessible route that has a level ground surface that is stable, firm, and slip resistant in the greenhouse. (2010 ADA Standards, 206 Accessible Routes, 302 Floor or Ground Surfaces, 402 Accessible Routes) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 30. | Main Parking Lot has 325 parking spaces, seven accessible stalls, should measure 96 inches minimum, and four accessible aisles, should measure 60 inches minimum, but are not the correct measurements, not properly marked and do not have accessible signage. The required number of accessible parking is eight, one of which shall be designated as van accessible. Three of the accessible parking stalls are next to the main flow of traffic and do not have access aisles. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle) | Reconfigure and restripe the parking lot to include three accessible parking spaces, one van accessible parking space, one additional access aisle. Also, provide eight accessible identification signs. Van accessible parking spaces shall be 132 inches wide minimum, and shall have an adjacent access aisle of 60 inches wide minimum and extend the full length of the parking space. Access aisles shall be marked to discourage parking in them. Accessible identification sign to be 60 inches minimum above the ground to the bottom of the sign in front of the accessible | Frank Reno (Maintenance Director) | April 2020 | Photographic evidence |

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|-----|---|--|-----------------------------------|-------------|-----------------------|
| | | parking spaces. (2010 ADA Standards, 208 Parking Spaces, 208.2.4 Van Parking Spaces, 502 Parking Spaces, 502.3 Access Aisle, 502.6 Identification) | | | |
| 31. | The walk from the Main Parking Lot has an abrupt change in level from the concrete pavement to the ramp that measures 1 3/4 inches and another abrupt change in level that measures 11 inches by 16 inches. Walks shall be of a continuing common surface, not interrupted by steps or abrupt changes in level. Whenever walks cross other walks, driveway, or parking lots they should blend into a common level. (ANSI 4.2 Walks, 4.2.2, 4.2.3) | Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of ¼ inch high maximum shall be permitted to be vertical. Changes in level between ¼ inch high minimum and ½ inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 32. | The walk from the Bus Parking Lot has an abrupt change in level from the pavement to the curb that measures 2 1/4 inches. Walks shall be of a continuing common surface, not interrupted by steps or abrupt changes in level. Whenever walks cross other walks, driveway, or parking lots they should blend into a common level. (ANSI 4.2 Walks, 4.2.2, 4.2.3) | Provide a ground surface that is stable, firm, and slip-resistant. Changes in level of ¼ inch high maximum shall be permitted to be vertical. Changes in level between ¼ inch high minimum and ½ inch high maximum shall be beveled with a slope not steeper than 1:2. (2010 ADA Standards, 302 Floor or Ground Surfaces, 303 Changes in Level, 303.2 Vertical, 303.3 Beveled) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |

| Finding | Issue Area and Required Corrective Action to be Completed | Specific Corrective Action to be Completed | Responsible Individual(s) | Target Completion Date | How Completion of Remedy will be Reported and Verified to State Agency |
|---------|---|--|-----------------------------------|------------------------|--|
| | ACCESSIBILITY Selah Academy | | | | |
| 1. | Door opening force to the doors was excessive, making it not easily operable and did not make the program areas readily assessable in E-3 (measured 16 pounds of pressure), E-4 (measured 10 pounds of pressure), and Gymnasium (measured 12 pounds of pressure). (Section 504 (34 CFR § 104.22) | Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 2. | Door opening force exceeded the maximum 5 pounds of pressure for pushing or pulling open the door in the Main Office (measured 6 pounds of pressure), Student Center (measured 12 pounds of pressure). (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | Reduce the pounds of pressure for each of the doors indicated. The force for pushing or pulling open a door or gate other than fire doors shall be 5 pounds maximum. (2010 ADA Standards, 404.2.9 Door and Gate Opening Force) | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |
| 3. | Women's Restroom (27 1/2 inch door width) by the Gymnasium, Men's Restroom by the Gymnasium (27 1/2 inch door width), Staff Restroom in the preschool area (28 inch door width) are not readily accessible. There are no accessible toilet room stalls that allow for access for individuals with disabilities. The distance from the classroom to the restroom is 470 feet out in the elements. (Section 504 (34 CFR § 104.22) | Provide accessible water closets and toilet compartments that have 32 inch minimum door width openings. (2010 ADA Standards, 404 Doors, Doorways, and Gates, 404.2.3 Clear Width Chapter 6: Plumbing Elements and Facilities, 603 Toilet and Bathing Rooms, 604 Water Closets and Toilet Compartments) | Frank Reno (Maintenance Director) | August 2020 | Photographic evidence |
| 4. | There is ADA accessible signage on the outside of the Unisex Restroom in the preschool area that is not accessible. (ANSI, 5.11 Identification) | Remove ADA accessible signage on the wall outside of the Staff Restroom in the preschool area. Place directional signage where there is ADA accessible restrooms. | Frank Reno (Maintenance Director) | January 2020 | Photographic evidence |

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|--|--|--|--|--|--|
| | | (2010 ADA Standards, 703 Signs, 703.4.2 Location, 703.5 Visual Characters, 703.6 Pictograms, 703.7 Symbols of Accessibility) | | | |
|--|--|--|--|--|--|

Superintendent's Signature: Sh. Backlund

Date: 2/21/2020

Print Name: Shane Backlund

MOA Monitoring Letters of Closure 2019-2020

The following subrecipients received an MOA Monitoring Letter of Closure on September 25, 2020.

- Centralia School District
- Chehalis School District
- East Valley (Spokane) School District
- Highline School District (Host District) for the Puget Sound Skills Center
- Liberty School District
- Lynden School District
- Mary Walker School District
- Meridian School District
- North Kitsap School District
- North Thurston School District
- Orting School District
- Riverside School District
- Soap Lake School District
- Toppenish School District
- Touchet School District
- Washtucna School District

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PO Box 47200
Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Lisa Grant, Superintendent
Centralia School District
PO Box 1610
Centralia, WA 98531

RE: Methods of Administration Civil Rights Review Notification

Dear Ms. Grant:

This letter serves as notification that the Centralia School District Methods of Administration (MOA) Civil Rights monitoring that began January 13, 2016, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361. Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Lisa Grant
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/ TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

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September 25, 2020

Dr. Christine Moloney, Superintendent
Chehalis School District
310 SW 16th Street
Chehalis, WA 98532-3809

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Moloney:

This letter serves as notification that the Chehalis School District Methods of Administration (MOA) Civil Rights monitoring that began February 25, 2020, has been closed by the Office of Superintendent of Public Instruction (OSPI). We appreciate the efforts in uploading evidence and encourage the district uses the checklist from the program monitor as a tool for best practice, and to ensure equitable and accessible programs and buildings for each and every student.

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361.

Dr. Christine Moloney
September 25, 2020
Page 2

Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Chris Reykdal, Superintendent

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September 25, 2020

Kelly Shea, Superintendent
East Valley School District
3830 N. Sullivan Road, Bldg. 1
Spokane Valley, WA 99216

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Shea:

This letter serves as notification that the East Valley School District Methods of Administration (MOA) Civil Rights monitoring that began October 18, 2016, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361. Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Kelly Shea
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/ TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Dr. Susan Enfield, Superintendent
Highline School District
125675 Ambaum Blvd. SW
Burien, WA 98166-0100

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Enfield:

This letter serves as notification that the Puget Sound Skill Center Methods of Administration (MOA) Civil Rights monitoring that began with the MOA notification letter on August 2, 2019, collection of documentation provided, and onsite that was scheduled for March 10-12, 2020, has been closed by the Office of Superintendent of Public Instruction (OSPI). We appreciate the efforts in uploading evidence and encourage the district uses the checklist from the program monitor as a tool for best practice, and to ensure equitable and accessible programs and buildings for each and every student.

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361.

Dr. Susan Enfield
September 25, 2020
Page 2

Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

cc:

Todd Moorhead, Director
Puget Sound Skills Center

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/ TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Brett Baum, Superintendent
Liberty School District
29818 S North Pine Creek Road
Spangle, WA 99031

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Baum:

This letter serves as notification of changes that have taken place regarding the Methods of Administration (MOA) Civil Rights reviews. Liberty School District will not be reviewed until selected through the Consolidated Program Review (CPR) process.

On February 6, 2020, an updated [Memorandum of Procedures](#) was 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 clarifying a return to the 1979 MOA guidelines. The Office of Superintendent of Public Instruction submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, CPR will be the process used for Career and Technical Education (CTE) monitoring. Districts will only be selected through the CPR process or by request.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). The Office of Superintendent of Public Instructions' Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint, including family and employees. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361.

Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Brett Baum
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Jim Frey, Superintendent
Lynden School District
1203 Bradley Road
Lynden, WA 98264-9514

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Frey:

This letter serves as notification that the Lynden School District Methods of Administration (MOA) Civil Rights monitoring that began November 13, 2014, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361. Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Jim Frey
September 25, 2020
Page 2

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Rick Winters, Superintendent
Mary Walker School District
500 N 4th Street
Springdale, WA 99173

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Winters:

This letter serves as notification of changes that have taken place regarding the Methods of Administration (MOA) Civil Rights reviews. Mary Walker School District will not be reviewed until selected through the Consolidated Program Review (CPR) process.

On February 6, 2020, an updated [Memorandum of Procedures](#) was 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 clarifying a return to the 1979 MOA guidelines. The Office of Superintendent of Public Instruction submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, CPR will be the process used for Career and Technical Education (CTE) monitoring. Districts will only be selected through the CPR process or by request.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). The Office of Superintendent of Public Instructions' Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint, including family and employees. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361.

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Rick Winters
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Dr. James Everett, Superintendent
Meridian School District
214 W. Laurel Road
Bellingham, WA 98226

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Everett:

This letter serves as notification of changes that have taken place regarding the Methods of Administration (MOA) Civil Rights reviews. Meridian School District will not be reviewed until selected through the Consolidated Program Review (CPR) process.

On February 6, 2020, an updated [Memorandum of Procedures](#) was 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 clarifying a return to the 1979 MOA guidelines. The Office of Superintendent of Public Instruction submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, CPR will be the process used for Career and Technical Education (CTE) monitoring. Districts will only be selected through the CPR process or by request.

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Dr. James Everett
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Dr. Laurynn Evans, Superintendent
North Kitsap School District
18360 Caldart Ave. NE
Poulsbo, WA 98370

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Evans:

This letter serves as notification that the North Kitsap School District Methods of Administration (MOA) Civil Rights monitoring that began November 5, 2015, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Laurynn Evans
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

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September 25, 2020

Dr. Debra Clemens, Superintendent
North Thurston School District
305 College St. NE
Lacey, WA 98516-5390

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Clemens:

This letter serves as notification that the North Thurston School District Methods of Administration (MOA) Civil Rights monitoring that began June 4, 2013, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Debra Clemens
September 25, 2020
Page 2

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Tuesday, October 22, 3-4 pm
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Sincerely,

Rebecca Wallace

Rebecca Wallace
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Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Dr. Tony Apostle, Superintendent
Orting School District
121 Whitesell St. NE
Orting, WA 98360

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Apostle:

This letter serves as notification that the Orting School District Methods of Administration (MOA) Civil Rights monitoring that began February 18, 2020, has been closed by the Office of Superintendent of Public Instruction (OSPI). We appreciate the efforts in uploading evidence and encourage the district uses the checklist from the program monitor as a tool for best practice, and to ensure equitable and accessible programs and buildings for each and every student.

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Tony Apostle
September 25, 2020
Page 2

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Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

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Executive Director
Career and Technical Education

Deifi Stolz

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Dr. Ken Russell, Superintendent
Riverside School District
34515 North Newport Highway
Chattaroy, WA 99003

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Russell:

This letter serves as notification that the Riverside School District Methods of Administration (MOA) Civil Rights monitoring that began March 12, 2015, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Ken Russell
September 25, 2020
Page 2

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Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

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Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Sunshine Pray, Superintendent
Soap Lake School District
410 Ginkgo Street S.
Soap Lake, WA 98851

RE: Methods of Administration Civil Rights Review Notification

Dear Ms. Pray:

This letter serves as notification of changes that have taken place regarding the Methods of Administration (MOA) Civil Rights reviews. Soap Lake School District will not be reviewed until selected through the Consolidated Program Review (CPR) process.

On February 6, 2020, an updated [Memorandum of Procedures](#) was 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 clarifying a return to the 1979 MOA guidelines. The Office of Superintendent of Public Instruction submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, CPR will be the process used for Career and Technical Education (CTE) monitoring. Districts will only be selected through the CPR process or by request.

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Sunshine Pray
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

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Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

John Cerna, Superintendent
Toppenish School District
306 Bolin Drive
Toppenish, WA 98948

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Cerna:

This letter serves as notification that the Toppenish School District Methods of Administration (MOA) Civil Rights monitoring that began February 22, 2016, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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John Cerna
September 25, 2020
Page 2

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Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Robert Elizondo, Superintendent
Touchet School District
90 Champion Street
Touchet, WA 99360

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Elizondo:

This letter serves as notification of changes that have taken place regarding the Methods of Administration (MOA) Civil Rights reviews. Touchet School District will not be reviewed until selected through the Consolidated Program Review (CPR) process.

On February 6, 2020, an updated [Memorandum of Procedures](#) was 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 clarifying a return to the 1979 MOA guidelines. The Office of Superintendent of Public Instruction submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, CPR will be the process used for Career and Technical Education (CTE) monitoring. Districts will only be selected through the CPR process or by request.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). The Office of Superintendent of Public Instructions' Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint, including family and employees. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361.

Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Robert Elizondo
September 25, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 25, 2020

Todd Spear, Superintendent
Washtucna School District
730 E. Booth Avenue
Washtucna, WA 99371

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Spear:

This letter serves as notification of changes that have taken place regarding the Methods of Administration (MOA) Civil Rights reviews. Washtucna School District will not be reviewed until selected through the Consolidated Program Review (CPR) process.

On February 6, 2020, an updated [Memorandum of Procedures](#) was 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 clarifying a return to the 1979 MOA guidelines. The Office of Superintendent of Public Instruction submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, CPR will be the process used for Career and Technical Education (CTE) monitoring. Districts will only be selected through the CPR process or by request.

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Todd Spear
September 25, 2020
Page 2

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Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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MOA Monitoring Letters of Closure 2019-2020

The following subrecipients received an MOA Monitoring Letter of Closure on September 28, 2020.

- Bainbridge Island School District
- Bethel School District
- Bethel School District (Host District) for the Pierce County Skills Center
- Cashmere School District
- Edmonds School District
- Enumclaw School District
- Lake Chelan School District
- Lopez Island School District
- Mansfield School District
- Renton School District
- Selah School District
- Skykomish School District
- South Kitsap School District
- Spokane School District
- Stanwood-Camano School District

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Dr. Peter Bang-Knudsen, Superintendent
Bainbridge Island School District
8489 Madison Ave. NE
Bainbridge Island, WA 98110-2999

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Bang-Knudsen:

This letter serves as notification that the Bainbridge Island School District Methods of Administration (MOA) Civil Rights monitoring that began April 29, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361. Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Dr. Peter Bang-Knudsen
September 28, 2020
Page 2

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<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

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September 28, 2020

Tom Seigel, Superintendent
Bethel School District
516 176th St. E.
Spanaway, WA 98387

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Seigel:

This letter serves as notification that the Bethel School District Methods of Administration (MOA) Civil Rights monitoring that began June 5, 2018, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Tom Seigel
September 28, 2020
Page 2

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Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

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September 28, 2020

Tom Seigel, Superintendent
Bethel School District
516 176th St. E.
Spanaway, WA 98387

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Seigel:

This letter serves as notification that the Pierce County Skills Center Methods of Administration (MOA) Civil Rights monitoring that began June 4, 2018, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Tom Seigel
September 28, 2020
Page 2

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Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

cc:

Michelle Ledbetter, Director
Pierce County Skills Center

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/ TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

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September 28, 2020

Glenn Johnson, Superintendent
Cashmere School District
210 Division Street
Cashmere, WA 98815

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Johnson:

This letter serves as notification that the Cashmere School District Methods of Administration (MOA) Civil Rights monitoring that began March 29, 2017, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Glenn Johnson
September 28, 2020
Page 2

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Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

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September 28, 2020

Dr. Gustavo Balderas, Superintendent
Edmonds School District
20420 68th Avenue W
Lynnwood, WA 98036

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Balderas:

This letter serves as notification that the Edmonds School District Methods of Administration (MOA) Civil Rights monitoring that began February 26, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Gustavo Balderas
September 28, 2020
Page 2

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Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

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September 28, 2020

Dr. Shaun Carey, Superintendent
Enumclaw School District
2929 Mcougall Avenue
Enumclaw, WA 98022

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Carey:

This letter serves as notification that the Enumclaw School District Methods of Administration (MOA) Civil Rights monitoring that began March 12, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Shaun Carey
September 28, 2020
Page 2

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Rebecca Wallace

Rebecca Wallace
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Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
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Chris Reykdal, Superintendent

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September 28, 2020

Barry DePaoli, Superintendent
Lake Chelan School District
309 E Johnson Avenue
Lake Chelan, WA 98816

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. DePaoli:

This letter serves as notification that the Lake Chelan School District Methods of Administration (MOA) Civil Rights monitoring that began November 8, 2016, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Barry DePaoli
September 28, 2020
Page 2

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Brian Auckland, Superintendent
Lopez Island School District
86 School Road
Lopez Island, WA 98261

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Auckland:

This letter serves as notification that the Lopez Island School District Methods of Administration (MOA) Civil Rights monitoring that began May 31, 2017, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Brian Auckland
September 28, 2020
Page 2

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/ TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us

Old Capitol Building
PO Box 47200
Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Michael Messenger, Superintendent
Mansfield School District
491 Road 14 NE
Mansfield, WA 98830

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Messenger:

This letter serves as notification that the Mansfield School District Methods of Administration (MOA) Civil Rights monitoring that began May 22, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

In an effort to provide related resource contacts we would share that discrimination complaints should be filed with a district's civil rights compliance coordinator or the [U.S Department of Education, Office for Civil Rights](#). OSPI's Equity and Civil Rights Office [Complaints and Concerns About Discrimination](#) webpage provides information about how to file a complaint. District staff, families, and employees, can contact the Equity and Civil Rights Office with questions: equity@k12.wa.us, 360-725-6162, TTY: 360-664-6361. Additionally, the [Dispute Resolution](#) webpage provides options under the Individuals with Disabilities Education Act. Special Education complaints may be addressed to Glenna Gallo, Assistant Superintendent of Special Education: speced@k12.wa.us, 360-725-6075, TTY: 360-664-3631.

Michael Messenger
September 28, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

If you have questions or need further technical assistance, please contact Deifi Stolz at deifi.stolz@k12.wa.us or 360-725-6254.

Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

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September 28, 2020

Dr. Damien Pattenaude, Superintendent
Renton School District
300 SW 7th Street
Renton, WA 98057

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Pattenaude:

This letter serves as notification that the Renton School District Methods of Administration (MOA) Civil Rights monitoring that began April 17, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Damien Pattenaude
September 28, 2020
Page 2

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<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Shane Backlund, Superintendent
Selah School District
316 W. Naches Avenue
Selah, WA 98942

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Backlund:

This letter serves as notification that the Selah School District Methods of Administration (MOA) Civil Rights monitoring that began January 23, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Shane Backlund
September 28, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Thomas Jay, Superintendent
Skykomish School District
105 North 6th Street
Skykomish, WA 98288

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Jay:

This letter serves as notification that the Skykomish School District Methods of Administration (MOA) Civil Rights monitoring that began April 11, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Thomas Jay
September 28, 2020
Page 2

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Tuesday, October 22, 3-4 pm
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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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PO Box 47200
Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Tim Winter, Superintendent
South Kitsap School District
2689 Hoover Ave. SE
Port Orchard, WA 98366-3034

RE: Methods of Administration Civil Rights Review Notification

Dear Mr. Winter:

This letter serves as notification that the South Kitsap School District Methods of Administration (MOA) Civil Rights monitoring that began February 28, 2017, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Tim Winter
September 28, 2020
Page 2

Please take the opportunity to attend the CTE MOA technical assistance Zoom meeting regarding compliance with civil rights requirements:

Tuesday, October 22, 3-4 pm
<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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PO Box 47200
Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Dr. Adam Swinyard, Superintendent
Spokane School District
200 N. Bernard Street
Spokane, WA 99201-0282

RE: Methods of Administration Civil Rights Review Notification

Dear Dr. Swinyard:

This letter serves as notification that the Spokane School District Methods of Administration (MOA) Civil Rights monitoring that began February 5, 2019, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Dr. Adam Swinyard
September 28, 2020
Page 2

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<https://zoom.us/j/97717350090>

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Sincerely,

Rebecca Wallace

Rebecca Wallace
Executive Director
Career and Technical Education

Deifi Stolz

Deifi Stolz
MOA Program Supervisor
Career and Technical Education

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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

September 28, 2020

Jean Shumate, Superintendent
Stanwood-Camano School District
26920 Pioneer Highway
Stanwood, WA 98292-9548

RE: Methods of Administration Civil Rights Review Notification

Dear Ms. Shumate:

This letter serves as notification that the Stanwood-Camano School District Methods of Administration (MOA) Civil Rights monitoring that began April 18, 2017, has been closed by the Office of Superintendent of Public Instruction (OSPI).

On February 6, 2020, an updated [Memorandum of Procedures](#) was issued by the Department of Education, providing Washington an opportunity to approach clarified MOA requirements under a new state plan. OSPI submitted a [plan](#) that will focus on technical assistance and aligns program monitoring with existing processes within our state, which was approved by the Department of Education Office of Civil Rights on September 18, 2020. Moving forward, the Consolidated Program Review (CPR) will be the process used for formal Career and Technical Education (CTE) monitoring. Districts will be selected through the CPR process or by request. The district must continue to ensure buildings and programs are equitable and accessible for all students in accordance with state and federal nondiscrimination laws. OSPI encourages the district to use previous MOA findings and guidance as best practice. OSPI will continue to provide resource documentation to support district compliance with state and federal laws.

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Jean Shumate
September 28, 2020
Page 2

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Sincerely,

Rebecca Wallace

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Executive Director
Career and Technical Education

Deifi Stolz

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MOA Program Supervisor
Career and Technical Education

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2018-2020
Biennial Report for
Washington State Post-
Secondary Institutions

Office for Civil Rights
Methods of Administration

Section I

Introductory Materials, Staff Resources, & Sub-Recipient Universe

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) requesting each state submit a plan for administering Methods of Administration (MOA) and ensuring the civil rights of all students enrolled in educational institutions receiving federal funds from DOE. In response to this request, Washington State’s Workforce Training and Education Coordinating Board (WTECB) submitted a revised plan for Washington state (the “state”) in June 2020. This plan was approved by OCR on September 18, 2020.

This report provides a report of postsecondary activities conducted under MOA guidelines between July 1, 2018 and June 30, 2020. The report has been prepared following the approved format described in the “Washington: Methods of Administration” report (the “plan”) submitted to OCR in June of 2020, and approved in September 2020. Post-Secondary MOA activities described in this report were conducted by:

State Board for Community and Technical Colleges (SBCTC)
1300 Quince Street SE
P.O. Box 42495
Olympia, WA 98504-2495

Staff Resources

The following individuals employed by SBCTC had responsibility for MOA activities associated with Washington state post-secondary educational institutions:

Washington State Fiscal Year 2018-19

| Staff (Reviews/Technical Assistance) | FTE |
|---|------------|
| Maryam Jacobs, MOA Coordinator | 25% |
| Steve Lewandowski, Chief Architect | 10% |
| Other | 1% |

Washington State Fiscal Year 2019-20

| Staff (Reviews/Technical Assistance) | FTE |
|---|------------|
| Maryam Jacobs | 35% |
| Steve Lewandowski | 10% |
| Other | 2% |

For review of post-secondary institutions, SBCTC primarily enlists the skills of two employees: Maryam Jacobs, SBCTC's, System Internal Auditor and the primary post-secondary MOA Coordinator, and Steve Lewandowski, SBCTC's Main Architect. Maryam Jacobs, performs all MOA review, technical assistance and communications not related to facilities conditions, as well as reporting functions. Steve Lewandowski performs all tasks relating to facility conditions to include reviews, technical assistance and follow-up. Both Steve and Maryam provide technical assistance as needed. In addition, the assistance of an administrative assistance and the Director of Accounting & Business Services, John Ginther, is enlisted for review, editing and preparation of final documents.

Sub-Recipient Universe

The community and technical college system is comprised of 34 individual college campuses with an additional 54 satellite campuses. The system uses 984 buildings with nearly 21 million square feet.

The system sub-recipient universe consists of five technical colleges and 28 community colleges which make up the universe of 33 sub-recipients. Two individual colleges in the Pierce district are combined into one subrecipient. This list of Washington State post-secondary institutions, as well as the date of their last complete MOA review are as follows:

Washington State Community and Technical Colleges

| | Name of Institution | Type | Date of Last MOA Review |
|----|-------------------------------|-----------|-------------------------|
| 1 | Bates Technical College | Technical | October 2015 |
| 2 | Bellevue College | Community | September 2016 |
| 3 | Bellingham Technical College | Technical | February 2012 |
| 4 | Big Bend Community College | Community | April 2019 |
| 5 | Cascadia College | Community | November 2011 |
| 6 | Centralia College | Community | June 2012 |
| 7 | Clark College | Community | July 2006 |
| 8 | Clover Park Technical College | Technical | November 2009 |
| 9 | Columbia Basin College | Community | October 2017 |
| 10 | Edmonds Community College | Community | March 2003 |
| 11 | Everett Community College | Community | April 2006 |
| 12 | Grays Harbor College | Community | March 2020 |
| 13 | Green River College | Community | February 2008 |
| 14 | Highline College | Community | October 2007 |

| | | | |
|----|---|-----------|----------------|
| 15 | Lake Washington Institute of Technology | Technical | November 2012 |
| 16 | Lower Columbia College | Community | October 2009 |
| 17 | North Seattle College | Community | October 2014 |
| 18 | Olympic College | Community | September 2014 |
| 19 | Peninsula College | Community | December 2008 |
| 20 | Pierce College | Community | October 2015 |
| 21 | Renton Technical College | Technical | October 2016 |
| 22 | Seattle Central College | Community | November 2007 |
| 23 | Shoreline Community College | Community | November 2008 |
| 24 | Skagit Valley College | Community | October 2008 |
| 25 | South Puget Sound Community College | Community | February 2012 |
| 26 | South Seattle College | Community | October 2010 |
| 27 | Spokane Community College | Community | June 2006 |
| 28 | Spokane Falls Community College | Community | October 2019 |
| 29 | Tacoma Community College | Community | August 2017 |
| 30 | Walla Walla Community College | Community | May 2006 |
| 31 | Wenatchee Valley College | Community | October 2018 |
| 32 | Whatcom Community College | Community | November 2007 |
| 33 | Yakima Valley College | Community | July 2013 |

Section II Results of Prior Year Reviews

The following table provides a listing of review items related to previous bi-annual reports that remain unresolved as of the date of this report's submission. The table also includes reason(s) for any delays and the date the item is expected to be corrected:

| Institution | Year of Original Review | Section | Item(s) Remaining Open | Date of Expected Correction | Reason for Delay (If applicable) |
|-------------------------|-------------------------|-------------------------------|---|-----------------------------|---|
| <i>Bellevue College</i> | <i>2016</i> | <i>Employment</i> | <i>1 – Item L.iii</i> | <i>June 2021</i> | <i>Consultant hired to provide advise on the issue has been delayed due to COVID-19 restrictions.</i> |
| <i>Pierce College</i> | <i>2015</i> | <i>Facility Accessibility</i> | <i>1-ADA0218</i> | <i>February 2021</i> | <i>Funding delays-Item is in the process of being corrected</i> |
| <i>Pierce College</i> | <i>2015</i> | <i>Facility Accessibility</i> | <i>4- ADA0219 ADA0221 ADA0236 ADA0237</i> | <i>July 2021</i> | <i>Funding delays-Item is in the process of being corrected</i> |
| <i>Pierce College</i> | <i>2015</i> | <i>Facility Accessibility</i> | <i>5- ADA0246 ADA0247 ADA0248 ADA0249 ADA0263</i> | <i>September 2021</i> | <i>Funding delays-Item is in the process of being corrected</i> |
| <i>Pierce College</i> | <i>2015</i> | <i>Facility Accessibility</i> | <i>7- ADA0188 ADA0189 ADA0190 ADA0191 ADA0193 ADA0194 ADA0224</i> | <i>October 2021</i> | <i>Funding delays-Item is in the process of being corrected</i> |
| <i>Pierce College</i> | <i>2015</i> | <i>Facility Accessibility</i> | <i>4- ADA0198 ADA0199 ADA0200 ADA0201</i> | <i>November 2021</i> | <i>Funding delays-Item is in the process of being corrected</i> |

Section III

Summary of Monitoring Activity for the Prior Two Years

During the 2018-19 and 2019-20 academic years, SBCTC staff performed four Civil Rights compliance reviews at the following colleges:

| Institution | Was Institutions Low Risk in all areas? | Sections requiring further review: | Date of review? | Number of Issues Noted | Copy of LOF | Copy of VCP | Current Status |
|---------------------------------|---|------------------------------------|-----------------|--------------------------------|--------------|-------------|----------------|
| Wenatchee Valley College | N/A | N/A | Oct 2018 | 15 non-facility 45 facility | Attachment A | | Ongoing |
| Big Bend Community College | N/A | N/A | Apr 2019 | 13 non-facility 42 Facility | Attachment B | | Ongoing |
| Spokane Falls Community College | N/A | N/A | Oct 2019 | 13 non-facility 47 facility | Attachment C | | Ongoing |
| Grays Harbor College | N/A | N/A | Mar 2020 | 12 non-facility 54 facility | Attachment D | | Ongoing |

All reviews were performed under previous MOA guidelines rescinded in February 2020.

Section IV

Summary of Technical Assistance Provided

During the period covered by this report, SBCTC was performing MOA activities as required by guidelines in place prior to the February 2020 Dear Colleague memorandum. Under these rules most MOA activity consisted of performance of on-site comprehensive reviews, reporting issues found during these reviews, and ensuring review findings were corrected as previously agreed upon. As such, a comprehensive effort to provide technical assistance and training was not undertaken.

Most technical assistance provide during the prior two years consisted of answering questions for students and employees of colleges and providing on-site training during reviews. As prosed in the state's 2020 plan, a system to enhance training and technical services is being designed and implemented.

ATTACHMENT A
WENATCHEE VALLEY COLLEGE

State Board for Community and Technical Colleges

Civil Rights Compliance Review Letter of Findings



Wenatchee Valley College
January 2, 2019

FOREWORD

The Methods of Administration (MOA) Coordinator for the State Board for Community and Technical Colleges (SBCTC) performed an on-site review at Wenatchee Valley College (WVC) during the week of October 29 to November 2, 2018. As a recipient of federal financial assistance, Wenatchee Valley College is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, age, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) requires each state agency responsible for administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs that receive federal assistance from the U.S. Department of Education. The purpose of the on-site review was to determine the college's compliance with the guidelines and the following federal laws and regulations:

- Title VI of the *Civil Rights Act of 1964* (Title VI) and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 (Title IX) and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the *Rehabilitation Act of 1973* (Section 504) and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the *Americans with Disabilities Act of 1990* (Title II) and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

While it was not the purpose of this review to assess the college's compliance with Washington State civil rights laws and regulations, the college should also be aware of these requirements contained in Chapter 49.60 RCW and Title 162 WAC.

Please note that although the resolutions to the items noted in the Letter of Findings (LOF) will complete the college's obligations in regards to this review, compliance with civil rights requirements is an ongoing obligation requiring continued internal monitoring and effort.

Wenatchee Valley College was selected for review based on SBCTC's targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their Career Technical Education (CTE) enrollment on the basis of race, sex, and disability. SBCTC's targeting plan also uses other optional rating criteria for selection of colleges to be reviewed. These additional criteria include the length of time since a college was last reviewed, and disparities between total completion rates and CTE completion rates on the basis of race, sex, and disabilities.

This LOF summarizes SBCTC's findings in the following twelve major areas of review:

- A. Administrative Requirements
- B. Site Location and Student Eligibility Criteria

- C. Student Recruitment
- D. Admissions
- E. Student Financial Assistance
- F. Counseling and Prevocational Programs
- G. Services for Students with Disabilities
- H. Accessibility
- I. Comparable Facilities
- J. Work Study, Cooperative Education, and Job Placement
- K. Apprenticeship Training Programs
- L. Employment

This LOF describes any finding of non-compliance for which corrective action is required. *The “Non-Compliance” sections of this letter require a response. “Recommendations” do not require responses, but are intended to advise the college of ways the educational experience might be made more accessible to students from protected groups.*

Please use the Voluntary Compliance Plan (VCP) template attached to provide the college’s responses to findings of non-compliance. At a minimum, the VCP should address the following:

- How the college will remedy each item of non-compliance (*Resolution/Work Done* column);
- The identity and contact information for the individual responsible for completing the corrective action plan (*Person Responsible* column); and
- A target completion date (month and year) (*Target Date* Column).

Please note the other two columns are for use by SBCTC staff when confirming the completion of the required corrective action. Finally, the completed VCP should be signed at the bottom by an individual at the college with sufficient authority to ensure all corrective actions noted are performed as described and by the target dates.

The completed VCP must be returned to SBCTC by February 19, 2019. If the college is unable to meet this deadline, please contact Maryam Jacobs, SBCTC’s MOA Coordinator at (360) 704-4389 or mjacobs@sbctc.edu as soon as possible to discuss an alternate completion date. SBCTC will review the VCP, and either approve it as is, or will work with you to ensure that the appropriate corrective action is taken to bring the college into compliance.

In each subsection below, the “Non-compliance” section is followed by the federal regulations citations. In the case of facilities, the regulations in effect at the time of building construction or alteration are cited.

Section A-Administrative

Recipients must have certain basic requirements in place to comply with Department of Education's Office of Civil Rights (OCR) Guidelines, Title VI, Title IX, Section 504 and Title II. These basic procedures include the following: an annual public notice; continuous non-discrimination notification; designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II; and a grievance procedure that will allow students an avenue for dealing with alleged discrimination. To verify this, we reviewed numerous documents and electronic materials, and interviewed administrators, Title IX and Section 504 coordinators, students, staff and faculty.

A.i - Continuous Notification

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the college that the college does not discriminate on the basis of race, color, national origin, sex, disability, or age.

Non-Compliance:

- I. The college's nondiscrimination statement is not easily accessible on the college's main website. The statement is located on the bottom of the homepage, under "Public Disclosure". In one location under Public Disclosure (the "Equal Opportunity-Affirmative Action" link), the statement only refers to employment actions. The statement can also be found under "Guidelines for Equal Opportunity and Affirmative Action Statements in University Publications", however the statements on this page have the following deficiencies:
 - a. *Long Form of Equal Opportunity Statement* – Required information on coordinators is not included;
 - b. *Long Form of EO/AA Statement for Job Announcements* – Sex is not included as a protected category;
 - c. *Medium Form of Equal Opportunity Statement* – Disability is not included as a protected category; and
 - d. *Short Form of Equal Opportunity Statement for Publications Where Participation or Attendance is invited* – A link to the full statement is not included.

In addition, the short form of the non-discrimination statement should only be used when space for the full-statement is not available.

2. A review of 49 printed brochures, forms, marketing pamphlets, and other documents found that only six of the 49 documents had a complete and accurate non-discrimination statement. Issues noted included no non-discrimination statement on the form at all (28 instances), coordinator information not listed (eight instances),

use of short form without a link to the actual statement (five instances) and various other issues.

Criteria:

34 CFR §104.8(a) – A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a)... “Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications.”

34 CFR §104.8 (b) – If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

Required Action:

In accordance with the Title IX and Section 504 regulations, 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, community members, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name or title, address, and telephone number.

A.ii Title IX/Section 504/Title II Coordinators

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use individuals' names for the contact information for printed materials, but it is not necessary. Identification of the coordinator's title is sufficient for printed materials. For the college's website, the name of the coordinator must be included.

Non-Compliance:

WVC has designated the Executive Director of Human Resources as the employee responsible for coordination of Section 504, Title II and Title IX efforts. However, most employees and students interviewed were not aware of the identity of the coordinator. In addition, as previously noted, the information on the coordinator was not posted on many of the non-discrimination notices reviewed.

Criteria:

34 CFR §106.8(a) – Designation of responsible employee. Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions which would be prohibited by this part. The recipient shall notify all its students and employees of the name, office address and telephone number of the employee or employees appointed pursuant to this paragraph.

34 CFR §104.7(a) – Designation of responsible employee. A recipient that employs fifteen or more persons shall designate at least one person to coordinate its efforts to comply with this part.

Required Action:

In accordance with the Title IX and Section 504 regulations, 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, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

It is recommended the college incorporate training and notification on the identity of the college's coordinator in orientations, meetings, and campus dialog. In addition, it is recommended the name or title and contact information for the coordinator be included on any publication discussing Title IX, disability and other prohibited discrimination and on all nondiscrimination notices.

Recommendations:

- Discussion with campus community members found very few were aware of their obligations and the requirement to report any and all potential Title IX and bias incidents to the college's coordinator. We recommend the college take measures to notify students, staff, and faculty of their obligation to report potential incidents to appropriate officials in a timely manner.
- Interviews and review of records indicated the college has been able to address and resolve all Title IX issues to date, but staff indicated that this process has at times strained resources. Due to the high priority given to Title IX issues, staff and investigators assigned to work on these issues are required to postpone all their regularly assigned work, which can create a backlog. Interviewees recommended management explore the option for increasing available recourses for Title IX investigations or consider training additional staff for this role as back-up.

A.iii Annual Public Notification

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement, as well as the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Non-Compliance:

WVC has its annual non-discrimination statement published on its website under "Public Disclosure", "Annual Public Notice of Career and Technical Education Opportunities." The statement is available both in English and Spanish, but the notice does not include age as a protected category.

In addition, the college also published the non-discrimination statement in its Continuing Education Catalog/Discover magazine, distributed to all of the surrounding counties. This statement also omits "age" as a protected category.

Criteria:

34 CFR §100 Appendix B IV.O (Guidelines) - Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term, which includes all required components noted above. The notification should include a brief summary of the college's program offerings, admission criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area.

In addition, since the college has acknowledged that its service area includes one or more "communities of national origin minority persons with limited English language skills", it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them. The statement must also include language indicating lack of English language skills will not be a barrier to attaining an education at the college.

A.iv Grievance Procedure

A recipient shall adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

Non-Compliance:

Although WVC has a policy on grievance procedures (1000.350), the policy was not found on the college's website and the majority of staff and students interviewed were not aware of the policy. A search of the college's website only found a page discussing and referring the reader to RCW's specific to disability issues and outside investigative agencies.

Criteria:

34 CFR §104.7(b) – Adoption of grievance procedures. A recipient that employs fifteen or more persons shall adopt grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part. Such procedures need not be established with respect to complaints from applicants for employment or from applicants for admission to postsecondary educational institutions.

34 CFR § 106.8 (b) – Complaint procedure of recipient. A recipient shall adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee complaints alleging any action which would be prohibited by this part

28 CFR § 35.107(b) – Complaint procedure. A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part.

Required Action:

The College should provide employees and students with a copy of the college's Complaint Procedure policy and take appropriate measures to notify its students and employees that there is a grievance procedure for individuals who feel they are the victim of discrimination and harassment. In addition, WVC should take measures to ensure the procedures are readily available to students and employees by making the policy easily available on-line or in other appropriate locations such as the employee and student handbooks, catalog, etc. Finally, it is recommended the college incorporate information on the policy in orientations and meetings to familiarize the campus community with the grievance procedures.

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| Section B - Site Location and Student Eligibility Criteria |
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Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability.

Issues that could result in discrimination or segregation include the selection of sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, national origin, sex, or disability.

B.i Student Eligibility

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminate on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocation education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

Non-Compliance:

As required by Washington state law, WVC has an open enrollment policy for the majority of its programs. However for participation in the college's fire science program, students must be affiliated with a local fire station and be accepted as a volunteer firefighter. As such, the college does not have a role in accepting students for this program. The college does not have a written agreement with local fire departments and as such, cannot guarantee that these local agencies are following the required civil rights rules prohibiting discrimination.

Criteria:

34 CFR §100 Appendix B IV.A (Guidelines) Criteria controlling student eligibility for admission to vocational education schools, facilities and programs may not unlawfully discriminate on the basis of race, color, national origin, sex, or handicap. A recipient may not develop, impose, maintain, approve or implement such discriminatory admissions criteria.

Required Action:

The College should make necessary changes to the fire science program to guarantee access to all eligible students, regardless of their membership in a protected group. To achieve this, WVC should either establish written agreements with partner fire departments requiring these local entities to follow the college's open enrollment policy, or should take over the process of accepting students in the program. In addition, the college should ensure all prerequisites used to accept potential students as volunteer firefighters/fire science students are strictly established and only relate to the educational component of the program and not requirements for obtaining employment as a firefighter.

B.ii Site Selection and Modifications

Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

Non-Compliance:

WVC has an unofficial partnership with local fire departments which requires students to complete half of their studies at the college and the other half at a local fire station. Since these fire stations are not part of the college and there is no written agreement with the fire stations, WVC cannot ensure these sites are accessible to all students.

Criteria:

34 CFR §100 Appendix B IV.B (Guidelines) – State and local recipients may not select or approve a site for a vocational education facility for the purpose or with the effect of excluding, segregating, or otherwise discriminating against students on the basis of race, color, or national origin. Recipients must locate vocational education facilities at sites that are readily accessible to both nonminority and minority communities, and that do not tend to identify the facility or program as intended for nonminority or minority students.

Required Action:

WVC should take measures to ensure the fire stations used for training are accessible to all community members and enter written agreements with these local municipalities requiring them to provide accessible facilities and sites to all students participating in the Fire Science program.

B.iii Residency

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.

No Evidence of Non-Compliance

The college does not have attendance zones and does not exclude students based on geographic boundaries.

Section C - Recruitment

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should represent persons of different races, national origins, sexes, and disabilities.

C.i Recruitment Activities

Recipients must conduct their recruitment activities so as to not exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

No Evidence of Non-Compliance

The college does not have attendance zones and does not exclude students based on geographic boundaries.

C.ii Recruitment Materials

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disabilities.

No Evidence of Non-Compliance

Our review found no evidence that any material's descriptions of opportunities had the purpose or effect of excluding a protected group.

C.iii Recruitment Teams

To the extent possible, recruiting teams should represent persons of different races, colors, national origins, sexes, and disabilities.

No Evidence of Non-Compliance

The college's demographics relating to the recruitment team showed a diverse group working in this area.

C.iv Counseling Limited English Proficiency (LEP)/Sensory Impairments

Recipients must ensure that counselors can effectively communicate with students with limited English proficiency and students with sensory impairments.

No Evidence of Non-Compliance

The review found no indication that counselors were unable to communicate with students with sensory impairments or with limited English language proficiency.

C.v Promotional Efforts

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration.

Non-Compliance:

A review of pictures for various programs in magazines and brochures found many that perpetuate stereotypes. The photographs used for Engineering Technology, Electronics, Engineering, and Fire Sciences only depict males, with the Fire Sciences picture only showing white males. The photographs for Nursing Assistance and RN programs show all females, except for the Nursing Assistant picture which had five females and one male.

Criteria:

34 CFR §100 Appendix B (Guidelines V.E) – Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents’ night, shop demonstrations, visitation by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups traditionally have not been represented. If a recipient’s service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

Required Action:

The college should review pictures and illustrations contained in promotional and advertising material and ensure they portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities. The college should take measures to ensure material being used does not contain pictures that perpetuate stereotypes.

C.vi Service Area LEP

If a recipient’s service area contains a community with persons of limited English proficiency, information must be available to that community in its language.

No Evidence of Non-Compliance

The college serves a large Hispanic/Latino community and has a variety of programs and promotional materials available in Spanish to serve individuals from these communities. The college’s service area does not contain any other communities of limited English proficiency.

Recommendation:

In interviews with staff members used as translator, interviewees stated that providing these services often meant they were forced to neglect their regular duties and this could at time create difficulties. It is recommended the college consider use of additional/alternative resources when possible (phone translation services, software, etc.) and/or to adjust job duties and schedules to reduce the hardships experienced by bi-lingual employees providing translation assistance.

Section D - Admissions

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admission criteria excludes a disproportionate number of persons of a particular race, color, national origin, sex, or disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

D.i Discriminatory Criteria

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.

No Evidence of Non-Compliance

Our review of admission policies for various programs, both technical and academic, and interviews with admissions staff did not find any indication the college has discriminatory admission criteria.

Recommendation:

The college's automotive program requires a personal interview for admission. During an interview with a faculty member for the program, he stated that as part of the interview the student is asked why they are interested in the field. The faculty member stated he prefers students looking to make a career in automotive rather than pursuing the field as a hobby. To date, no student has been denied admission to the program, however the risk exists that interested individuals could be discouraged based on their willingness or ability to obtain employment in the field. Federal guidelines require postsecondary institutions receiving federal funds to provide educational opportunities regardless of a student's ability to find work in a field and prohibits directing or profiling of students based on their ability to work in a field. It is recommended that the college ensure all staff and faculty are aware of this requirement and for the college to ensure any pre-admission requirements are impartial and not designed to improperly influence or eliminate a student from a program.

D.ii Preadmission Inquiries

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

No Evidence of Non-Compliance

A review of the college's application and interviews with staff involved in student intake found no evidence of prohibited preadmission inquiries.

D.iii Disabled & Employment Limitations

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

No Evidence of Non-Compliance

A review of materials and interviews with staff and students found no indication that the college denied or limited students with disabilities from participating in any programs or courses.

D.iv LEP & Benefit Limitation

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

No Evidence of Non-Compliance

The college's service area contains a large Hispanic/Latino community and the college continues to take steps to promote all opportunities to all community members. Our review of demographics, interviews with staff and students, and review of program descriptions found no indication that admission to any vocational program is restricted due to limited English language skills.

D.v Preadmission Tests

Postsecondary admission tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

No Evidence of Non-Compliance

A review of documents and interviews with staff and students found no areas of non-compliance.

D.vi Disability Inquiries

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

No Evidence of Non-Compliance

Interviews with staff, students, and faculty, as well as the college's Director of Access Services, and review of forms and documents found no evidence the college is making preadmission inquiries on disabilities.

Section E - Student Financial Assistance

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequest, or similar legal instrument or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, national origin, or disability.

E.i Financial Assistance Availability

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

No Evidence of Non-Compliance

Discussions with staff and students and review of documentation found the college does not have any financial assistance programs restricted to students of a particular race, color, national origin or disability. The review of the college's statistical information on financial assistance indicated financial assistance is available to all students regardless of their membership in a protected group.

Recommendation:

As a service, the college's Financial Aid division provides interested individuals with information on a large number of scholarships and private grant opportunities. Students interviewed were high appreciative of this service and indicated that this information had been very useful to them. Staff members interviewed stated the information is distributed through various means to include hand-outs, bulletin boards, etc. Since many of these awards may be restricted to specific underrepresented groups or by sex, which is prohibited by federal and state law, it is recommended the college clearly label and identify these awards that are not provided through the college or its foundation. The information should clearly state that the information is being provided as a service and that the college and its staff are not involved in the process of evaluating applications or selecting recipients for the funds.

E.ii Sex-Restricted Awards

Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument.

No Evidence of Non-Compliance

The college does not have any scholarship restricted by sex.

E.iii Equitable Financial Aid Information

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

Non-Compliance:

The review of financial aid information and materials provided by WVC and on the college's website did not find any indication of bias. In addition, information appears to be written without any indication of bias. However review of these documents found none had a non-discrimination notice.

Criteria:

34 CFR §100 Appendix B (Guidelines VI-B) — Student Financial Assistance- Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials, to include all financial aid forms, made available to participants, students, applicants, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at:

<http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification by name or title, address, and telephone number of the

employee or employees responsible for coordinating compliance efforts. This statement should be included on all financial aid written materials.

E.iv LEP Financial Aid Information

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

No Evidence of Non-Compliance

The college has a significant population of community member who are native Spanish speakers. The review found the college is taking appropriate measures to ensure information and assistance to these community members is available in Spanish. The college has translated a large number of financial aid forms to Spanish and has been very proactive in ensuring all interested students receive needed financial information. The division continues to work towards translating more forms in order to better serve its Latino community.

Recommendation:

During interviews, students stated they would appreciate more information on financial aid, especially scholarships, during initial orientation and when starting school. They noted that staff and faculty were very helpful in providing information, but students often were not aware of who to ask for information or in case of individuals with limited English language skills, they could be intimidated when trying to navigate the process. It is recommended the college consider providing information on where to find additional information during orientations or at the beginning of school terms.

Section F – Counseling and Pre-Vocational Programs

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

F.i Counseling Materials & Activities

Recipients must ensure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

No Evidence of Non-Compliance

A review of the college’s promotional and recruiting materials, review of policies and procedures, and interviews with staff and students found no indication of discrimination.

F.ii Directing or Profiling

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student’s prospects for success in any career or program, based upon the student’s race, color, national origin, sex, or disability.

No Evidence of Non-Compliance

A review of program requirements for various programs, statistical information, and interviews with staff and students found no indication that students were being profiled or directed/steered to certain courses or programs.

F.iii Directing Toward Restrictive Career

Recipients may not counsel disabled students toward more restrictive career objectives than nondisabled students with similar abilities and interests.

No Evidence of Non-Compliance

A review of various program requirements, interviews with staff and students, and review of enrollment statistics found no indication that disabled students were being directed towards more restrictive careers.

Recommendation:

The college offers a certification course for Emergency Medical Technicians. A review of the course description in the college catalog found the description for the required physical strength and abilities vague, which could lead to individuals, especially those with physical disabilities, to avoid the course. The course description, under "Entrance Requirements" states "*Have the physical strength to carry, lift, extricate, and perform similar maneuvers in a manner not detrimental to the patient, fellow emergency technicians, or self.*" It is recommended the college provide a more concrete and exact description of the physical requirements for the course. This could include the required weight that needs to be lifted, the amount of time and/or how far the weight needs to be carried, etc.

F.iv Disproportionate Enrollment

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

No Evidence of Non-Compliance

A review of enrollment data found no indication of disproportionate enrollment at the college.

Section G - Services for Students with Disabilities (SWD)

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

G.i SWD Access to Programs

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

Non-Compliance:

1. WVC has unwritten partnerships with local businesses and organizations in order to provide clinical and hands-on experience to students in certain programs. The college

does not have written agreements with these organizations and therefore cannot ensure that the disabilities of students will be accommodated by these entities. Currently, the college has a student with a service animal enrolled in a program requiring clinical hours for completion of the program, and the participating business is unable to accommodate the service animal.

2. Students interested in enrolling in the college's Fire Sciences program are required to be accepted and referred to the program by a local fire department. These fire departments often require a physical examination to ensure the potential student has the ability to perform job required for job functions and the college plays no role in this acceptance process.

Civil rights laws require that any physical examination and criteria for enrollment in an education program be directly related to the educational portion of the program, and a student's ability to perform job functions cannot be used as a factor to bar a student from enrollment.

Criteria:

34 CFR 101.4(a) – No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied benefits of, or otherwise be subjected to discrimination under any program or activity which received Federal financial assistance.

28 CFR 130(a) – No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

34 CFR 100 Appendix B (Guidelines VI-B) – State and local recipients may not select or approve a site for vocational education facility for the purpose or with the effect of excluding, segregating, or otherwise discriminating against students on the basis of race, color, or national origin. Recipients must locate vocational education facilities at sites that are readily accessible to both nonminority and minority communities, and that do not tend to identify the facility or program as intended for nonminority or minority students.

Required Action:

WVC should enter formal agreements with any organization or business used to provide students with required clinical experience and/or training to ensure the entity will provide required accommodations to individuals with disabilities. In instances where an individual's disability cannot be reasonably accommodated, the college must create alternative plans and curriculum to ensure the student is able to receive the same educational opportunities and trainings as their peers.

For the Fire Sciences program, it is recommended the college work with local fire districts to ensure physical tests are not based on job requirements and that the college's required open enrollment policy is being followed, or to manage the student acceptance process for the program internally.

Recommendation:

Although interviews did not indicate any student or staff had been denied accommodations or had experienced difficulties in obtaining required services, staff members stated that they had experienced pockets of resistance among faculty when asked to provide some required accommodations. They noted these were most often related to non-visual disabilities and that to-date staff had always been successful in convincing faculty to acquiesce. However, these staff recommended additional training on civil right laws to faculty members.

G.ii Equipment Barriers

Disabled students must not be excluded from vocational, career, or academic programs, courses, services or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

No Evidence of Non-Compliance

A review of equipment, tools and resources found the college maintains a large supply of resources and tools to assist disabled students. Interviews with staff and students and review of various materials found no indication that disabled students were excluded or discouraged from participation in activities or services due to equipment barriers or lack of services.

G.iii Postsecondary 504 Services

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete a degree program and/or licensure requirements.

Non-Compliance:

WVC has unwritten partnerships with local businesses and organizations in order to provide clinical and hands-on experience to students in certain programs. The college does not have written agreements with these organizations and therefore cannot ensure that disabilities of students will be accommodated at these outside locations. Currently, the college has a student with a service animal enrolled in a program requiring clinical hours for completion of the program, and the participating businesses are unable to accommodate the service animal.

Criteria:

34 CFR 104.44(a) – A recipient to which this subpart applies shall make such modifications to its academic requirements as are necessary to ensure that such requirements do not discriminate or have the effect of discriminating, on the basis of handicap, against a qualified handicapped applicant or student. Academic requirements that the recipient can demonstrate are essential to the instruction being pursued by such student or to any directly related licensing requirement will not be regarded as discriminatory within the meaning of this section. Modifications

may include changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements, and adaptation of the manner in which specific courses are conducted.

Required Action:

The college should enter formal agreements with any organization or business used to provide students with required clinical experience and/or training to ensure the entity will provide required accommodations to individuals with disabilities. In instances where an individual's disability cannot be reasonably accommodated, the college must create alternative plans and curriculums to ensure the student is able to receive the same educational opportunities and training as their peers.

G.iv Academic Adjustment

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

Non-Compliance:

WVC has unwritten partnerships with local businesses and organizations in order to provide clinical and hands-on experience to students in certain programs. The college does not have written agreements with these organizations and therefore cannot ensure that disabilities of students will be accommodated at these outside locations. Currently, the college has a student with a service animal enrolled in a program requiring clinical hours for completion of the program, and the participating businesses are unable to accommodate the service animal.

Criteria:

34 CFR 104.44(a) – A recipient to which this subpart applies shall make such modifications to its academic requirements as are necessary to ensure that such requirements do not discriminate or have the effect of discriminating, on the basis of handicap, against a qualified handicapped applicant or student. Academic requirements that the recipient can demonstrate are essential to the instruction being pursued by such student or to any directly related licensing requirement will not be regarded as discriminatory within the meaning of this section. Modifications may include changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements, and adaptation of the manner in which specific courses are conducted.

28 CFR 35.130(b)(7) – A public entity shall make reasonable modification in policies, practices or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

34 CFR 100 Appendix B (Guidelines VI-N) – Recipients may not deny handicapped students access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. In necessary, recipients must:

- (1) Modify instructional equipment; (2) modify or adapt the manner in which the courses are offered; (3) house the program in facilities that are readily accessible to mobility impaired students or alter facilities to make them readily accessible to mobility impaired students; and (4) provide auxiliary aids that effectives make lectures and necessary materials available to postsecondary handicapped students; (5) provide related aids or services that assure secondary students an appropriate education.*

Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory. However, where possible, a recipient must adjust those requirements to the needs of individual handicapped students.

Access to vocational programs or course may not be denied handicapped students on the ground that employment opportunities in any occupation or profession may be more limited for handicapped persons than for non-handicapped persons.

Required Action:

Wenatchee Valley College should enter formal agreements with any organization or business used to provide students with required clinical experience and/or training to ensure the entity will provide required accommodations to individuals with disabilities. In instances where an individual's disability cannot be reasonably accommodated, the college must create alternative plans and curriculum to ensure the student is able to receive the same educational opportunities and training as their peers.

G.v Evaluation Accommodations & Modifications

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes or achievement levels or other relevant factors are measured and not the disability.

No Areas of Non-Compliance

A review of academic programs and requirements, as well as interviews with staff and students, found no indication that course examinations or evaluations were administered in a manner designed or with the effect of discriminating against those with disabilities.

G.vi Equitable Housing Opportunities

Students receive equitable opportunities to benefit from housing programs regardless of their sex, national origin, color, race, or disability.

No Areas of Non-Compliance

Discussions with staff and students and review of documentation found that the college's residence hall provides equitable housing opportunities to individuals with disabilities.

G.vii Comparable & Accessible Housing

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

No Areas of Non-Compliance

Discussions with staff and students and review of documentation found that the college's residence hall provides equitable and accessible housing opportunities to individuals with disabilities at the same cost for individuals without a disability.

G.viii Off-Campus Housing

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their sex, race, color, national origin or disability.

Not Applicable

The College does not provide off-campus housing services to students.

G.ix Landlords

The college does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

Not Applicable

The college does not work with or refer students to any landlords.

Section H – Accessibility

Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) – must ensure each program is fully accessible.
- Between 6/4/1977 – 1/17/1991 New construction - must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: New construction – must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: New construction and alterations – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).
- Between 9/15/2010 and 3/15/2012 – may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: New construction – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

Section H is provided at the end of this document as Attachment A

Section I – Comparable Facilities

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female, or disabled students should be located in similar proximity to the associated classrooms, shops or laboratories.

Section I is provided at the end of this document as Attachment A

Recommendations:

In interviews with female students enrolled in the automotive program, lack of a convenient restroom near the classrooms was cited. A review of the facilities found that restrooms for

female students are available and meet standards, however it was unclear if the location of these restrooms is known to students and if they were open for use during class time. It is recommended the college consider placing signs to direct female students and staff in the buildings to the female bathroom and to ensure they remain open for use during hours of operation.

Section J – Work Study Cooperative Education, Job Placement, and Apprentice Training

A college not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to not foster discrimination by businesses that provide workplace learning sites. Assignments cannot be made or withheld in such programs simply because of the sex, race, color, national origin, or disability of a student. Colleges may not cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. Although not required, the college should consider having written agreements whereby the cooperating worksite indicates that they will not discriminate and that they understand the college will not work with any business that does. The college should periodically review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

J.i Work Study & Job Placement

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

Non-Compliance:

The college does have work study and co-op opportunities for students however, there are no written agreements with these entities. In addition, the college does not have any process for review of student acceptance, and placement in these opportunities to ensure no pattern of discrimination is present.

Criteria:

34 CFR 100.3(a-b) – (a) **General.** No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) **Specific discriminatory actions prohibited:** (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he

satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR 106.31(d) – (1) This paragraph applies to any recipient which requires participation by any applicant, student, or employee in any education program or activity not operated wholly by such recipient, or which facilitates, permits, or considers such participation as part of or equivalent to an education program or activity operated by such recipient, including participation in educational consortia and cooperative employment and student-teaching assignments. (2) Such recipient: (i) Shall develop and implement a procedure designed to assure itself that the operator or sponsor of such other education program or activity takes no action affecting any applicant, student, or employee of such recipient which this part would prohibit such recipient from taking; and (ii) Shall not facilitate, require, permit, or consider such participation if such action occurs.

34 CFR 104(b) – (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service. (2) For purposes of this part, aids, benefits, and services, to be equally effective, are not required to produce the identical result or level of achievement for handicapped and nonhandicapped persons, but must afford handicapped persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs. (3) Despite the existence of separate or different aid, benefits, or services provided in accordance with this part, a recipient may not deny a qualified handicapped person the opportunity to participate in such aid, benefits, or services that are not separate or different. (4) A recipient may not,

directly or through contractual or other arrangements, utilize criteria or methods of administration (i) that have the effect of subjecting qualified handicapped persons to discrimination on the basis of handicap, (ii) that have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the recipient's program or activity with respect to handicapped persons, or (iii) that perpetuate the discrimination of another recipient if both recipients are subject to common administrative control or are agencies of the same State. (5) In determining the site or location of a facility, an applicant for assistance or a recipient may not make selections (i) that have the effect of excluding handicapped persons from, denying them the benefits of, or otherwise subjecting them to discrimination under any program or activity that receives Federal financial assistance or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the program or activity with respect to handicapped persons. (6) As used in this section, the aid, benefit, or service provided under a program or activity receiving Federal financial assistance includes any aid, benefit, or service provided in or through a facility that has been constructed, expanded, altered, leased or rented, or otherwise acquired, in whole or in part, with Federal financial assistance.

34 CFR 100 Appendix B (Guidelines VII-A) — A recipient must insure that: (a) It does not discriminate against its students on the basis of race, color, national origin, sex, or handicap in making available opportunities in cooperative education, work study and job placement programs; and (b) students participating in cooperative education, work study and job placement programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex, or handicap in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay. If a recipient enters into a written agreement for the referral or assignment of students to an employer, the agreement must contain an assurance from the employer that students will be accepted and assigned to jobs and otherwise treated without regard to race, color, national origin, sex, or handicap. Recipients may not honor any employer's request for students who are free of handicaps or for students of a particular race, color, national origin, or sex. In the event an employer or prospective employer is or has been subject to court action involving discrimination in employment, school officials should rely on the court's findings if the decision resolves the issue of whether the employer has engaged in unlawful discrimination.

Required Action:

The college should either enter written agreements with outside businesses providing students with co-op and work study experience, which requires adherence to civil rights rules for these businesses, or create a process to monitor student acceptance, participation, and placement in these businesses to ensure no pattern of discrimination exists.

J.ii Employer Agreements

A recipient that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, or pay.

Non-Compliance:

WVC does not have formal agreements with employers and businesses used for Co-Op education or those used to provide students with work experience.

Criteria:

34 CFR 100.3(a-b) – (a) **General.** No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) **Specific discriminatory actions prohibited:** (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR 106.38 – (a) Assistance by recipient in making available outside employment. A recipient which assists any agency, organization or person in making employment available to any of its student: (1) Shall assure itself that such

employment is made available without discrimination on the basis of sex; and (2) Shall not render such services to any agency, organization, or person which discriminates on the basis of sex in its employment practices. (b) Employment of students by recipients. A recipient which employs any of its students shall not do so in a manner which violates subpart E of this part.

34 CFR 104.46(b) – *A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient.*

34 CFR 100 Appendix B (Guidelines VI-N) – *Recipients may not deny handicapped students access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. If necessary, recipients must: (1) Modify instructional equipment; (2) modify or adapt the manner in which the courses are offered; (3) house the program in facilities that are readily accessible to mobility impaired students or alter facilities to make them readily accessible to mobility impaired students; and (4) provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary handicapped students; (5) provide related aids or services that assure secondary students an appropriate education.*

Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory. However, where possible, a recipient must adjust those requirements to the needs of individual handicapped students.

Access to vocational programs or courses may not be denied handicapped students on the ground that employment opportunities in any occupation or profession may be more limited for handicapped persons than for non-handicapped persons.

Required Action:

The college should enter into written agreements with all partner businesses and agencies providing work experience and job opportunities to students to ensure these organizations do not act on a discriminatory basis. In addition, the college should monitor the patterns of hiring, placement, assignment of work tasks, hours of employment, and level of responsibility for students participating in these programs to ensure no disparity exists.

Section K - Apprentice Training Program

Colleges also have the responsibility to take steps to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. Although not required, the college should consider having a written agreement whereby the apprenticeship program indicates it will not discriminate on these bases. The college should periodically review apprenticeship assurance forms or agreements, the assignment of students presently in such programs and the placement process to see whether any such patterns exist.

K.i Apprenticeship Agreements

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability.

No Evidence of Non-Compliance

A review of the college's apprenticeship agreement found required language prohibiting discrimination in the contract. In addition, interviews with student, staff and faculty found no indication of non-compliance.

Section L - Employment

Colleges are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

L.i Employment Practices

Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or disability. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion, or other discrimination against students.

Non-Compliance:

The review found no evidence of non-compliance in the general employment practices of the college for faculty and staff. The college has strong policies and procedures designed to ensure that there is no discrimination or appearance of discrimination in general employment. However, WVC does not follow these same guidelines for students. Student positions are posted on a board and students directly contact the position supervisor to

apply for these jobs. These supervisors do not receive any training or information on best practices and/or civil rights laws. The screening process, questions asked of applicants, and the materials used during the process of selecting student employees are created and used by each individual supervisor and are not reviewed or screened by the college's human resource department. During interviews, the need for supervisory, civil rights, and title IX training for those who supervise students was mentioned by several staff and faculty members. Interviewees stated the need was especially crucial for part-time and adjunct faculty, and those working on the college's Omak campus.

Criteria:

34 CFR 100.3(c) – Where a primary objective of the Federal financial assistance to a program to which this regulation applies is to provide employment, a recipient may not (directly or through contractual or other arrangements) subject an individual to discrimination on the ground of race, color, or national origin in its employment practices under such program (including recruitment or recruitment advertising, employment, layoff or termination, upgrading, demotion, or transfer, rates of pay or other forms of compensation, and use of facilities), including programs where a primary objective of the Federal financial assistance is (i) to reduce the employment of such individuals or to help them through employment to meet subsistence needs, (ii) to assist such individuals through employment to meet expenses incident to the commencement or continuation of their education or training, (iii) to provide work experience which contributes to the education or training of such individuals, or (iv) to provide remunerative activity to such individuals who because of handicaps cannot be readily absorbed in the competitive labor market.

34 CFR 106.51 – (a) General. (1) No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in employment, or recruitment, consideration, or selection therefor, whether full-time or part-time, under any education program or activity operated by a recipient which receives Federal financial assistance. (2) A recipient shall make all employment decisions in any education program or activity operated by such recipient in a nondiscriminatory manner and shall not limit, segregate, or classify applicants or employees in any way which could adversely affect any applicant's or employee's employment opportunities or status because of sex. (3) A recipient shall not enter into any contractual or other relationship which directly or indirectly has the effect of subjecting employees or students to discrimination prohibited by this subpart, including relationships with employment and referral agencies, with labor unions, and with organizations providing or administering fringe benefits to employees of the recipient. (4) A recipient shall not grant preferences to applicants for employment on the basis of attendance at any educational institution or entity which admits as students only or predominantly members of one sex, if the giving of such preferences has the effect of discriminating on the basis of sex in violation of this part.

(b) Application. The provisions of this subpart apply to: (1) Recruitment, advertising, and the process of application for employment; (2) Hiring, upgrading, promotion, consideration for and award of tenure, demotion, transfer, layoff, termination, application of nepotism policies, right of return from layoff, and rehiring; (3) Rates of pay or any other form of compensation, and changes in compensation; (4) Job

assignments, classifications and structure, including position descriptions, lines of progression, and seniority lists; (5) The terms of any collective bargaining agreement; (6) Granting and return from leaves of absence, leave for pregnancy, childbirth, false pregnancy, termination of pregnancy, leave for persons of either sex to care for children or dependents, or any other leave; (7) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (8) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, selection for tuition assistance, selection for sabbaticals and leaves of absence to pursue training; (9) Employer-sponsored activities, including those that are social or recreational; and (10) Any other term, condition, or privilege of employment.

34 CFR 106.57 – (a) General. A recipient shall not apply any policy or take any employment action: (1) Concerning the potential marital, parental, or family status of an employee or applicant for employment which treats persons differently on the basis of sex; or (2) Which is based upon whether an employee or applicant for employment is the head of household or principal wage earner in such employee's or applicant's family unit. (b) Pregnancy. A recipient shall not discriminate against or exclude from employment any employee or applicant for employment on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom. (c) Pregnancy as a temporary disability. A recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom and any temporary disability resulting therefrom as any other temporary disability for all job related purposes, including commencement, duration and extensions of leave, payment of disability income, accrual of seniority and any other benefit or service, and reinstatement, and under any fringe benefit offered to employees by virtue of employment. (d) Pregnancy leave. In the case of a recipient which does not maintain a leave policy for its employees, or in the case of an employee with insufficient leave or accrued employment time to qualify for leave under such a policy, a recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom as a justification for a leave of absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status which she held when the leave began or to a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

34 CFR 106.60 – Pre-employment inquiries - (a) Marital status. A recipient shall not make pre-employment inquiry as to the marital status of an applicant for employment, including whether such applicant is "Miss or Mrs." (b) Sex. A recipient may make pre-employment inquiry as to the sex of an applicant for employment, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part.

34 CFR 104.13 – Employment criteria. (a) A recipient may not make use of any employment test or other selection criterion that screens out or tends to screen out handicapped persons or any class of handicapped persons unless: (1) The test score or other selection criterion, as used by the recipient, is shown to be job-related for the position in question, and (2) Alternative job-related tests or criteria that do not screen out or tend to screen out as many handicapped persons are not shown by the

Director to be available. (b) A recipient shall select and administer tests concerning employment so as best to ensure that, when administered to an applicant or employee who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's or employee's job skills, aptitude, or whatever other factor the test purports to measure, rather than reflecting the applicant's or employee's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure).

34 CFR 104.14 – Preemployment inquiries. (a) Except as provided in paragraphs (b) and (c) of this section, a recipient may not conduct a preemployment medical examination or may not make preemployment inquiry of an applicant as to whether the applicant is a handicapped person or as to the nature or severity of a handicap. A recipient may, however, make preemployment inquiry into an applicant's ability to perform job-related functions. (b) When a recipient is taking remedial action to correct the effects of past discrimination pursuant to 104.6 (a), when a recipient is taking voluntary action to overcome the effects of conditions that resulted in limited participation in its federally assisted program or activity pursuant to 104.6(b), or when a recipient is taking affirmative action pursuant to section 503 of the Act, the recipient may invite applicants for employment to indicate whether and to what extent they are handicapped, Provided, That: (1) The recipient states clearly on any written questionnaire used for this purpose or makes clear orally if no written questionnaire is used that the information requested is intended for use solely in connection with its remedial action obligations or its voluntary or affirmative action efforts; and (2) The recipient states clearly that the information is being requested on a voluntary basis, that it will be kept confidential as provided in paragraph (d) of this section, that refusal to provide it will not subject the applicant or employee to any adverse treatment, and that it will be used only in accordance with this part. (c) Nothing in this section shall prohibit a recipient from conditioning an offer of employment on the results of a medical examination conducted prior to the employee's entrance on duty, Provided, That: (1) All entering employees are subjected to such an examination regardless of handicap, and (2) The results of such an examination are used only in accordance with the requirements of this part. (d) Information obtained in accordance with this section as to the medical condition or history of the applicant shall be collected and maintained on separate forms that shall be accorded confidentiality as medical records, except that: (1) Supervisors and managers may be informed regarding restrictions on the work or duties of handicapped persons and regarding necessary accommodations; (2) First aid and safety personnel may be informed, where appropriate, if the condition might require emergency treatment; and (3) Government officials investigating compliance with the Act shall be provided relevant information upon request.

34 CFR 100 Appendix B (Guidelines VIII-A) – Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or handicap. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion or other discrimination against students.

Required Action:

WVC should establish more formal processes and practices for hiring Work Study students to ensure there is no discrimination or appearance of discrimination. Recommended policies and practices should include training supervisors of students on prohibited practices and creating standardized applications or interview questions. In addition, the college should monitor student hires by division or supervisor to ensure there are no patterns that could indicate possible discrimination or bias.

Recommendations:

- The demographics of the college's faculty is not reflective of the surrounding community and the population served by the college. As an example, the Hispanic population in the city of Wenatchee is over 32 percent and over 28 percent in Chelan County, however only 10 percent of full-time faculty and less than seven percent of part-time faculty are Hispanic. Attracting and retaining faculty from protected groups is a challenge faced by many colleges and although the review found no indication of bias in the college's practices that would contribute to this disparity, we recommend management explore their practices and processes to better attract and a more diverse faculty population.
- The college currently does not have written policies or guidelines on job reclassifications, adjustments, and pay raises. Interviews with HR staff indicated a process is in place and each of these changes are closely scrutinized and approved however, since the process is unwritten, there is little transparency. Several interviewees stated they believed there was bias in job reclassification and raises. We recommend the college document, formalize, and publicize these processes to increase transparency and reduce the impression of bias. In addition, we recommend the college consider periodically re-evaluating pay rates for various positions not recently reviewed to ensure pay rates remain equitable and competitive.

L.ii Employment Recruitment Notification

The recipient must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

All position announcements and job postings reviewed contained a complete and accurate non-discrimination statement, but WVC's application for employment does not include a non-discrimination statement.

Criteria:

34 CFR §104.8(a) – A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a).... Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications.

34 CFR §104.8 (b) – If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

Required Action:

In accordance with the Title IX and Section 504 regulations, 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. In addition, recipients should post a non-discrimination statement on the college's main web page in an easily accessible location.

To meet these requirements, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at:

<http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts

L.iii Salary Scales & Assignments

The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

No Evidence of Non-Compliance

The review found no indication of bias or discrimination in employment practices relating to salary and assignments.

L.iv Equal Opportunity & Reasonable Accommodations

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitations of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship.

No Evidence of Non-Compliance

Our interviews and review of documentation did not find any indication that the college is not providing equal employment opportunities to disabled individuals.

Other Recommendations

- Several individuals interviewed noted that although the college continues to be dedicated to serving its students and providing them with a positive educational experience, morale among employees on campus was low and that many employees felt executive management did not live by the same principles of creating inclusion and equity on campus. Interviewees believed some members of management created a hostile environment by discussing inappropriate subject (e.g., politics, religion, etc.) and making off-colored jokes. Interviewees also felt there was not a culture of inclusion and acceptance on campus and felt they were alienated and did not have a voice.

The college appears to recognize this issue and has taken steps to address morale among staff and faculty. A committee has been created to increase morale across campus and administration has held several events to foster inter-departmental cooperation and dialog, however employees felt more work is needed.

Recommendations included supervisory, civil rights, and sensitivity training for management and holding more mixers and events that encouraged and fostered dialog cross-divisionally.

- In interviews with students, staff, and faculty, interviewees indicated that the college has had some difficulties dealing with gender issues. The college is located in a conservative community and not all campus members are familiar with how to appropriately include and work with students with varying sexual and gender preferences. This lack of knowledge has especially been evident with some faculty members. It is recommended the college consider providing appropriate training to the campus community on gender related issues to better serve its students.

- Interviews with non-traditional students enrolled in vocational programs indicated that some students were experiencing a sense of isolation and may be subjected to subtle forms of discrimination due to being non-traditional. It is recommended the college consider providing training to students enrolled in vocational and technical programs with large population disparities on non-discrimination and Title IX issues.
- The college has recently established a residence hall and is working to establish appropriate policies and procedures to accommodate students living on campus. Employees working and supporting student residents have been receiving various training and the college's new Director of Resident Life plans to create a formalized training plan for residents, advisors, and student workers. We recommend the college continue working to create this plan to avoid Title IX and discrimination issues and to ensure residents feel included and do not experience any discriminatory behavior.
- Several interviewees believed the college should provide more extensive training on civil rights and Title IX, and should tailor training more to the individual's role on campus. Interviewees suggested a tiered training approach and to make parts of the training mandatory based on the individual's role on campus. Campus members felt that although basic training was provided, those employees dealing with students on a daily basis and working closely with them, should receive additional training and that many staff and faculty members most in need of this type of training did not attend the optional training opportunities available.
- As previously noted, the college serves a large Spanish speaking community. Interviewees suggested the college consider putting up some signs in Spanish to navigate to critical areas and around basic skills classes to better serve this community.
- Interviews with staff and faculty found the college has ample resources to assist community members who are Spanish speakers, but does not have the resources to assist individuals with hearing and visual disabilities, or those speaking a language other than English or Spanish. To date, this has not created any barriers, and individuals requiring additional assistance due to these types of disabilities and language barriers have received the services required, but staff working in the student service areas acknowledge that they are not trained and do not know of the appropriate tools needed to assist these individuals. It is recommended the college consider providing training and tools to ensure student service employees can successfully assist individuals with various disabilities and speaking languages other than English or Spanish.

Commendations

- WVC has taken commendable measures relating to addressing Title IX issues. To better identify and deal with any potential and alleged violations, the college has created inter-departmental agreements to ensure required information is shared with the college's coordinator. In addition to the agreements, the college also hired a Director for Security Services with both law enforcement and community outreach experience to increase communication and cooperation across campus necessary for managing civil rights issues and incidents. The college has also created a Bias Incident Team to better manage issue on campus across divisions.
- Interviews with students, staff, and faculty indicated the college provides superior support services to students. All interviewees stated that staff and faculty are active in ensuring students receive all services available and working towards ensuring all students feel supported and have a sense of inclusion. Interviewees were especially complimentary of the assistance and work of the college's access and veteran's services. Students that utilized these services had many examples of how the staff of these areas had gone above and beyond their duties to provide assistance and to resolve issues. In one instance, a student described issues he was having with another state agency in receiving educational benefits and the extra efforts taken by staff to ensure he received these benefits. Due to these efforts, the student was able to enroll for classes for the fall term as he was planning.
- Wenatchee Valley College's efforts to serve its Spanish speaking community are highly commendable. The college offers a large number of brochures, forms, and pamphlets in Spanish and appears to be able to ensure Spanish speaking community members are able to use all available services by providing Spanish speaking employees in most college areas. In interviews with Spanish speaking staff, they noted that they were continuously used as a resource in other areas and that college administration ensured at least one bi-lingual staff member was present at all events, conferences, and community events.
- The College is instituting a software system to better track and report incidents on campus. The system will assist in keeping better records for Title IX and will streamline reporting required by the Clery Act.

ATTACHMENT A

Accessibility for Students with Disabilities

Applicable Requirements

Guidelines Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

General compliance

This review was conducted pursuant to OCR's authority under Section 504 and its implementing regulations at 34 C.F.R. Part 104 and Title II of the ADA and its implementing regulations at 28 C.F.R. Part 35. These laws prohibit discrimination on the basis of disability by institutions receiving federal financial assistance from the U.S. Department of Education and by public entities. As a public college that is also a recipient of financial assistance from the Department, the college is subject to the provisions of Section 504 and Title II.

For existing facilities, Section 504 and Title II require that an institution operate its program so that, when viewed in its entirety, it is readily accessible to persons with disabilities (program accessibility standard). Under this standard, an institution is not required to make all existing facilities or every part of its facilities accessible, as long as the program or activity provided at each facility is readily accessible to persons with disabilities. See 34 C.F.R. 104.22 and 28 C.F.R. 35.150. An institution can provide program accessibility for existing facilities through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, or any other methods that result in making its programs or activities accessible to persons with disabilities.

The accessibility standard used for each asset depends on the date construction commenced. Construction commenced after June 3, 1977, through January 26, 1992, must comply with the American National Standards Institute standards (ANSI). For construction projects starting January 26, 1992 through March 12, 2012, the 1991 ADA standards must be met. The colleges chose to follow the 1991 ADA standards rather than the UFAS standards where the option existed during this period. Any construction starting after March 12, 2012 must comply with the 2010 ADA standards identified in the International Building Code. New alterations to a facility or part of a facility are analyzed similarly to new construction.

The available facility construction and alteration dates for all Washington State buildings do not typically include accurate month and day information. The available data includes the year of construction and/or major renovation substantial completion. A major renovation is recorded when a construction renovation project includes at least one major building component and the cost is more than 60% of the building component value. Typically, major renovations address

most building components and require compliance with current building code. Since the building construction or renovation date reflects the end of construction, the start of construction or renovation was calculated based on a typical two-year construction period. The accessibility standard identified in the building list below reflects the beginning of construction dates. If no construction date data was available, the current standard was applied.

Parking Lots

Accessible parking spaces within student parking lots are the start of the accessible route to an accessible student program or activity. Therefore, all parking lots that are designated as student parking must be configured to eliminate all barriers along the accessible route to student programs and activities.

College parking lots are typically designated and reviewed individually (per Advisory section 208.2 in the 2010 ADA Standards) rather than as a whole campus. A college typically has dozens of parking lots that are loosely connected and hard to delineate. Typically lot boundaries are defined by physical barriers that restrict access between lots (lack an accessible route between lots or separated by significant distance). However, ADA parking spaces may be clustered in one or more lots if equivalent or greater accessibility is provided in terms of distance from the accessible entrance, parking fees and convenience. These requirements apply to free parking or any type of paid parking. If only paid parking is provided and the College also provides free visitor spaces, then the visitor spaces should be considered a separate lot and will require accessible parking.

Since parking lot resurfacing or restriping efforts are not recorded in a database, the age of the lots are not known. Parking lots are typically maintained, where resurfacing occurs roughly every twenty years. Therefore, all parking lots were reviewed with the assumption that they were no more than 20 years old. Nearly all college campuses are more than 20 years old. In cases where the parking lot appeared to have been recently striped (within 5 years) or was part of a new campus construction project, the current accessibility standard was applied.

Accessible Routes

An accessible route must be a continuous, unobstructed path connecting all accessible elements and spaces within and between buildings or facility elements where student programs or activities are provided by the college. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts. While not every route is required to be accessible, an accessible route must exist between all student programs or activities provided by the college. Alternate routes are allowable when the route does not require students with disabilities to traverse greater distances or in unfavorable

conditions. All non-accessible parking areas and pedestrian routes should be marked as such with directional signage to the nearest accessible area or route.

Summary of Findings and Analysis

The following chart indicates the start of construction / alteration dates for the college facilities as well as the applicable accessibility standards.

| Building | Start of Construction, Major Renovation or acquisition (Most Recent Date) | Applicable Accessibility Standard |
|--------------------------------|---|--|
| Baseball Dugout - Home | 1998 | 1991 Standard |
| Baseball Dugout - Visitor | 1998 | 1991 Standard |
| Baseball Press Box | 1998 | 1991 Standard |
| Baseball Ticket Sales | 1998 | 1991 Standard |
| Batjer | 1948 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Brown Library | 2008 | 1991 Standard |
| Central Washington Univer | 2004 | 1991 Standard |
| Eller/Fox | 1986 | ANSI Standard |
| Elliot Street House | 1926 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Facilities | 2007 | 1991 Standard |
| Facilities Office And Shop | 2003 | 1991 Standard |
| Fastpitch Dugout - Home | 1999 | 1991 Standard |
| Fastpitch Dugout - Visitors | 1999 | 1991 Standard |
| Fastpitch Storage Shed - Large | 1999 | 1991 Standard |
| Fastpitch Storage Shed - Small | 1999 | 1991 Standard |
| Friendship Hall | 1983 | ANSI Standard |
| Gray House | 1928 | Readily Accessible: 34 C.F.R. Sec |

| | | |
|--------------------------------|------|---|
| | | 104.22; 28 C.F.R. Sec 35.150 |
| Greenhouse | 1967 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Gym | 1960 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Industrial Technology | 2008 | 1991 Standard |
| Music And Art Center | 2010 | 1991 Standard |
| North Administration Bldg | 1973 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| North Classroom | 1903 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Omak College Foundation Office | 2003 | 1991 Standard |
| Refrig | 1965 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Residence Hall | 2007 | 1991 Standard |
| Sexton | 1965 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Storage Building | 1968 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Van Tassell | 1960 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| W.S.U. College Bound Office | 2003 | 1991 Standard |
| Wells | 1950 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Wenatchi Hall | 2005 | 1991 Standard |

| | | |
|-------------------------------|---------|---|
| L-Cnt For Lifelong Learning | Unknown | 2010 Standard |
| Distance Learning Center | 1973 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Burnett Hall | 2013 | 2010 Standard |
| Facilities Storage Building | 2014 | 2010 Standard |
| New Student Recreation Center | 2015 | 2010 Standard |
| Baseball Concession/Restrooms | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Old West Side High School | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Old West Side Hs Ah2 | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Cnt For Lifelong Learning | Unknown | 2010 Standard |

Site Accessibility Compliance

S-1 **Non-Compliance:** The lot does not have the required number of accessible parking spaces near the Wells building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0445 in appendix.

Additional Field Notes: The three stalls marked as accessible are not located on an accessible route and do not have striping between stalls. These three are not required since the total number of accessible stalls exceeds the requirement without them. College can turn them into regular stalls.

Applicable Standard (1991 ADA Standards):4.1.2 (5) (a) If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured. Required Total Parking Minimum Number in Lot of Accessible Spaces: 1 to 25 = 1; 26 to 50 = 2; 51 to 75 = 3; 76 to 100 = 4; 101 to 150 = 5; 151 to 200 = 6; 201 to 300 = 7; 301 to 400 = 8; 401 to 500 = 9; 501 to 1000 = 2 percent of total; 1001 and over = 20, plus 1 for each 100 over 1000

Required Action to correct non-compliant component: Provide at least five accessible parking spaces. At least one space must be van accessible.

Current ADA Standard: 208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

- S-2 **Non-Compliance:** Parking spaces are not accessible because they are not the correct width or they do not have an appropriate access aisle near the Wells building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0446 in appendix.

Additional Field Notes: Need to provide access isles between stalls. College can omit two stalls for paint stripes since there are more than the required accessible stalls in this lot.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking with the required width and access aisle.

Current ADA Standard: 502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum. 502.3.4 Location. Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces.

- S-3 **Non-Compliance:** Parking spaces are not accessible because they are not the correct width or they do not have an appropriate access aisle near the Gym building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0447 in appendix.

Additional Field Notes: Striping required between stalls for access isles. College could use two of the stalls for striping since they have more than the required number of accessible stalls for this lot. Also, signs must be raised to at least five feet above the surface of the parking lot.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking with the required width and access aisle.

Current ADA Standard: 502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum. 502.3.4 Location. Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces.

S-4 **Non-Compliance:** Parking spaces are not accessible because they are not the correct width or they do not have an appropriate access aisle near the Gym building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0448 in appendix.

Additional Field Notes: Parking on west side of lot does not have required access isles. College can omit three of the accessible stalls to provide striping for access isles.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking with the required width and access aisle.

Current ADA Standard: 502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum. 502.3.4 Location. Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces.

S-5 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the New Student Recreation Center building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0449 in appendix.

Additional Field Notes: Signs need to be raised to five feet above surface of parking lot

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-6 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Sexton building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0450 in appendix.

Additional Field Notes: All signs for accessible parking must be raised. All accessible stalls must have painted symbol on surface. College can move accessible stall in furthest east location to a location currently reserved for the gallery or omit east accessible stall since there are more accessible spaces than are required for this lot.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-7 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Industrial Technology building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0451 in appendix.

Additional Field Notes: One accessible stall required in this lot. College can install restrictive sign at stall on west side of building to comply. Sign can be mounted to the building and at least five feet above parking surface.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall

include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-8 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Refrig building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0452 in appendix.

Additional Field Notes: Asphalt path and entrance threshold transitions both exceed 3/4"

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-9 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Refrig building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0453 in appendix.

Additional Field Notes: Threshold at building rear entrance is greater than 3/4".

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-10 **Non-Compliance:** The access ramp is too steep near the Batjer building. Modifications to this component must comply with current ADA standards. See

photo exhibit ADA0457 in appendix.

Additional Field Notes: East entrance has a ramp that exceeds the maximum allowed slope. Provide signage directing students to south accessible entrance.

Applicable Standard (1991 ADA Standards):4.8.2* Slope and Rise. The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be :12. The maximum rise for any run shall be 30 in (760 mm) (see Fig. 16). Curb ramps and ramps to be constructed on existing sites or in existing buildings or facilities may have slopes and rises as allowed in 4.1.6(3)(a) if space limitations prohibit the use of a 1:12 slope or less.

Required Action to correct non-compliant component: The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches.

Current ADA Standard: 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. Exception: In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

S-11 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Van Tassell building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0469 in appendix.

Additional Field Notes: Transition is roughly 1"

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

S-12 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Van Tassell building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0470 in appendix.

Additional Field Notes: The transition is 3/4" in many areas.

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

S-13 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Burnett Hall building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0480 in appendix.

Additional Field Notes: Sign is not located in front of accessible stall. Sign needs to be mounted at five feet above the surface of lot. Need to add "van accessible" sign below reserved parking sign.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

S-14 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Burnett Hall building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0481 in appendix.

Additional Field Notes: Ruts in path need to be repaired.

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift

(as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-15 **Non-Compliance:** The accessible parking spaces do not comply with the width and access aisle accessibility requirements near the North Classroom building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0484 in appendix.

Additional Field Notes: The access isle is 3'-0" wide (needs to be 5'-0"). Parking lot needs four accessible stalls. Signs need to be mounted at five feet above surface of lot.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking spaces that comply with the width and access aisle requirements.

Current ADA Standard: 502.2 Vehicle Spaces. Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3.EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.

Building Accessibility Compliance

- B-1 **Non-Compliance:** There is not enough knee clearance under the table in room 8006 of the Batjer building. See photo exhibit ADA0454 in appendix.

Field Notes: One table must comply

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by

correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) wide minimum. 306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (430 mm) minimum under the element.

B-2 **Non-Compliance:** The door does not have a big enough clear floor area in front of the door in room 8002 of the Batjer building. See photo exhibit ADA0455 in appendix.

Field Notes: If bathroom cannot be made accessible, provide signage to closest accessible building with accessible bathroom.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) inches in front of the door. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.2

B-3 **Non-Compliance:** The door is too narrow or does not have enough clear area in front of the door near room 8011 of the Batjer building. See photo exhibit ADA0456 in appendix.

Field Notes: Double doors with closers only allow 24" clearance when one door opened (32" min. required). College can either provide automatic door operators for both sets of doors, remove closers or provide signage to an alternate entrance along an accessible route with accessible parking.

Applicable Standard: The most recent construction or major renovation efforts began

in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide an opening that is at least thirty two (32) inches wide and a clear area of at least forty eight (48) inches in front of the opening. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1

B-4 **Non-Compliance:** The coat hooks are not located in a reachable range near room 8039 of the Batjer building. See photo exhibit ADA0458 in appendix.

Field Notes: Hook is at 54"

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-5 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected in room 4004 of the Gym building. See photo exhibit ADA0459 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1960 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-6 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected in room 4017B of the Gym building. See photo exhibit ADA0460 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1960 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-7 **Non-Compliance:** The door does not have a big enough clear floor area in front of the door near room 4010 of the Gym building. See photo exhibit ADA0461 in appendix.

Field Notes: Both men's and women's bathrooms have multiple physical barriers that are structural. College should provide signs directing students to the nearest accessible bathrooms

Applicable Standard: The most recent construction or major renovation efforts began in 1960 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) inches in front of the door. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.2

B-8 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach in room 3016 of the Eller/Fox building. See photo exhibit ADA0462 in appendix.

Field Notes: Upper two rows of the display are outside of reach range. Also need to provide clear area in front of display for front access.

Applicable Standard: The most recent construction or major renovation efforts began in 1986 for this building. Therefore, ANSI standards must be met.

ANSI standard: Section 3.3.1 The average unilateral vertical reach is 60 inches and ranges from 54 inches to 78 inches.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-9 **Non-Compliance:** There are not enough accessible seats in room 3015 of the Eller/Fox building. See photo exhibit ADA0463 in appendix.

Field Notes: No seats are accessible. College can provide a 60" long accessible table

allowing for two seats on the lower level.

Applicable Standard: The most recent construction or major renovation efforts began in 1986 for this building. Therefore, ANSI standards must be met.

ANSI standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Based on the room capacity, provide at least two accessible seats. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 221.2.1 Number and Location. Wheelchair spaces shall be provided complying with 221.2.1.221.2.1.1 General Seating. Wheelchair spaces complying with 802.1 shall be provided in accordance with Table 221.2.1.1.

B-10 **Non-Compliance:** The coat hooks are not located in a reachable range in room 3014 of the Eller/Fox building. See photo exhibit ADA0464 in appendix.

Field Notes: Both men's and women's.

Applicable Standard: The most recent construction or major renovation efforts began in 1986 for this building. Therefore, ANSI standards must be met.

ANSI standard: Section 3.3.1 The average unilateral vertical reach is 60 inches and ranges from 54 inches to 78 inches.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-11 **Non-Compliance:** The required number of accessible work stations or other surfaces are not provided in room 3003 of the Eller/Fox building. See photo exhibit ADA0465 in appendix.

Field Notes: At least one work station must be accessible.

Applicable Standard: The most recent construction or major renovation efforts began in 1986 for this building. Therefore, ANSI standards must be met.

ANSI standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the

accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide accessible work stations or other work surfaces. At least five percent of the total stations provided must be accessible. A minimum of one is required. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 226.1 General. Where dining surfaces are provided for the consumption of food or drink, at least 5 percent of the seating spaces and standing spaces at the dining surfaces shall comply with 902. In addition, where work surfaces are provided for use by other than employees, at least 5 percent shall comply with 902. 902.1 General. Dining surfaces and work surfaces shall comply with 902.2 and 902.3. EXCEPTION: Dining surfaces and work surfaces for children's use shall be permitted to comply with 902.4. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3.

B-12 **Non-Compliance:** The sink rim height is too high in room 3003 of the Eller/Fox building. See photo exhibit ADA0466 in appendix.

Field Notes: At least one sink must comply

Applicable Standard: The most recent construction or major renovation efforts began in 1986 for this building. Therefore, ANSI standards must be met.

ANSI standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Locate the sink rim at thirty four (34) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.3 Height. Lavatories and sinks shall be installed

with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground. EXCEPTIONS: 1. A lavatory in a toilet or bathing facility for a single occupant accessed only through a private office and not for common use or public use shall not be required to comply with 606.3.2. In residential dwelling unit kitchens, sinks that are adjustable to variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted where rough-in plumbing permits connections of supply and drain pipes for sinks mounted at the height of 29 inches (735 mm).

- B-13 **Non-Compliance:** The mirror is mounted too high near room Across from café of the Van Tassell building. See photo exhibit ADA0467 in appendix.

Field Notes: Can provide additional mirror.

Applicable Standard: The most recent construction or major renovation efforts began in 1960 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate the mirror so that the bottom is located forty (40) above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.3 Mirrors. Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground. Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.

- B-14 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 5001 of the Van Tassell building. See photo exhibit ADA0468 in appendix.

Field Notes: Top row is at 68".

Applicable Standard: The most recent construction or major renovation efforts began in 1960 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-15 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 5501 of the Central Washington Univer building. See photo exhibit ADA0471 in appendix.

Field Notes: Top of display at 67"

Applicable Standard: The most recent construction or major renovation efforts began in 2004 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction.

The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-16 **Non-Compliance:** The coat hooks are not located in a reachable range near room 6001 of the Sexton building. See photo exhibit ADA0472 in appendix.

Field Notes: Hook at 54"

Applicable Standard: The most recent construction or major renovation efforts began in 1965 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-17 **Non-Compliance:** The back wall grab bar does not meet the requirements for transfers in the Baseball Concession/Restrooms building. See photo exhibit ADA0473 in appendix.

Field Notes: Men's and women's. Back wall grab bar required. Also coat hook is above reach range (48" max)

Applicable Standard: It is not known when this building was constructed. Therefore, the current ADA standard was used for evaluation.

2010 ADA standard: Section 604.5 Grab Bars. Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall. 604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet

12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side. EXCEPTIONS: 1. The rear grab bar shall be permitted to be 24 inches (610 mm) long minimum, centered on the water closet, where wall space does not permit a length of 36 inches (915 mm) minimum due to the location of a recessed fixture adjacent to the water closet.

Required Action to correct non-compliant component: Provide a grab bar on the back wall that is at least thirty six (36) inches long or at least twenty four (24) inches long if it is obstructed and centered on the toilet.

B-18 **Non-Compliance:** The service counter is too high and/or too narrow near room 9200D of the Brown Library building. See photo exhibit ADA0474 in appendix.

Field Notes: Need to clear off counter.

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 7.2 Sales and Service Counters, Teller Windows, Information Counters. (1) In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type shall have a portion of the counter which is at least 36 in (915mm) in length with a maximum height of 36 in (915 mm) above the finish floor. It shall be on an accessible route complying with 4.3. The accessible counters must be dispersed throughout the building or facility. In alterations where it is technically infeasible to provide an accessible counter, an auxiliary counter meeting these requirements may be provided.

Required Action to correct non-compliant component: Provide a service counter that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or twenty four (24) inches long for a front approach. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

B-19 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 2162 of the Wenatchi Hall building. See photo exhibit ADA0475 in appendix.

Field Notes: Removable material at 60"

Applicable Standard: The most recent construction or major renovation efforts began

in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-20 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 2117 of the Wenatchi Hall building. See photo exhibit ADA0476 in appendix.

Field Notes: Top of displays at 60"

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall

be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-21 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 2308 of the Wenatchi Hall building. See photo exhibit ADA0477 in appendix.

Field Notes: Pull handle at 68" multiple labs

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-22 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 415 of the Burnett Hall building. See photo exhibit ADA0478 in appendix.

Field Notes: Display height is 65"

Applicable Standard: The most recent construction or major renovation efforts began in 2013 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located

within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-23 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 415 of the Burnett Hall building. See photo exhibit ADA0479 in appendix.

Field Notes: College should provide cane detection element in place on each side of drinking fountain.

Applicable Standard: The most recent construction or major renovation efforts began in 2013 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the

finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-24 **Non-Compliance:** The door is too narrow or does not have enough clear area in front of the door near room 902 of the Distance Learning Center building. See photo exhibit ADA0482 in appendix.

Field Notes: The doorway is 26" wide. The hallway is 34" wide. If modifications are not readily achievable, then equal access to the program or activity must be provided in an alternate location. The college must develop a policy to identify an accessible location.

Applicable Standard: The most recent construction or major renovation efforts began in 1973 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide an opening that is at least thirty two (32) inches wide and a clear area of at least forty eight (48) inches in front of the opening. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1

- B-25 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected in the Distance Learning Center building. See photo exhibit ADA0483 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1973 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-26 **Non-Compliance:** The door does not have a big enough clear floor area in front of the door near room 310 of the North Classroom building. See photo exhibit ADA0485 in appendix.

Field Notes: If modifications are not readily achievable, then equal access to the program or activity must be provided in an alternate location. There is 36" clear in front of door (needs to be 48"). The college can provide a sign directing students to the accessible bathroom in the adjacent building.

Applicable Standard: It is not known when this building was constructed. Therefore, the current ADA standard was used for evaluation.

2010 ADA standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.2

Required Action to correct non-compliant component: Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) inches in front of the door.

B-27 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 310 of the North Classroom building. See photo exhibit ADA0486 in appendix.

Field Notes: The display height is 66".

Applicable Standard: It is not known when this building was constructed. Therefore, the current ADA standard was used for evaluation.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access.

B-28 **Non-Compliance:** The coat hooks are not located in a reachable range near room 307 of the North Classroom building. See photo exhibit ADA0487 in appendix.

Field Notes: Can provide additional hooks at 48"

Applicable Standard: It is not known when this building was constructed. Therefore, the current ADA standard was used for evaluation.

2010 ADA standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor.

B-29 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range in the Friendship Hall building. See photo exhibit ADA0488 in appendix.

Field Notes: Top of display at 68"

Applicable Standard: The most recent construction or major renovation efforts began in 1983 for this building. Therefore, ANSI standards must be met.

ANSI standard: Section 3.3.1 The average unilateral vertical reach is 60 inches and ranges from 54 inches to 78 inches.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves

shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-30 **Non-Compliance:** There is not enough knee clearance under the table in the Friendship Hall building. See photo exhibit ADA0489 in appendix.

Field Notes: Clear height is 25"

Applicable Standard: The most recent construction or major renovation efforts began in 1983 for this building. Therefore, ANSI standards must be met.

ANSI standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) wide minimum. 306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (430 mm) minimum under the element.

2017-2018 Civil Rights Review
 Voluntary Compliance Plan (VCP)
 Wenatchee Valley College

| | |
|-----------------------------------|--|
| College Contact/Liaison: | Reagan Bellamy, Executive Director of HR |
| Last Day of Site Visit: | November 2, 2018 |
| Letter of Finding Date: | January 2, 2019 |
| VCP Date: | March 19, 2019 |
| Final Monitoring Date: | |
| Completion Date: | |
| Final VCP Acceptance Date: | |

A ADMINISTRATIVE

Recipients need to have a certain basic requirements in place to comply with OCR Guidelines. Title IX, Section 504, and Title II. These basic procedures include an annual public notice, continuous notification, designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II and a grievance procedure that will allow students an avenue for dealing with alleged discrimination. To verify this, it will be necessary to review many documents and to interview administrators, Title IX and Section 504 coordinators, faculty, and students.

(i) Continuous Notification:

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Results of Compliance Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation |
|--|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|---------------------|
| | | | | | | |

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|---------------------|---|---|--|--------------------------------------|-----------------|------------------------|
| <p>A.i.i</p> | <p>Non-Compliance - The college’s nondiscrimination statement is not easily accessible on the college’s main website. The statement is located on the bottom of the homepage, under “Public Disclosure”. In one location under Public Disclosure, the “Equal Opportunity-Affirmative Action” link, the statement only refers to employment actions. The statement can also be found under “Guidelines for Equal Opportunity and Affirmative Action Statements in University Publications”, however the statements on this page have the following deficiencies:</p> <ul style="list-style-type: none"> ✓ <i>Long Form of Equal Opportunity Statement</i> – Required information on coordinators is not included; ✓ <i>Long Form of EO/AA Statement for Job Announcements</i> – Sex is not included as a protected category; ✓ <i>Medium Form of Equal Opportunity Statement</i> – Disability is not included as a protected category; and ✓ <i>Short Form of Equal Opportunity Statement for Publications Where Participation or Attendance is invited</i> – A link to | <p>Statement: The nondiscrimination statement has been updated and discrepancies fixed. Campus has been notified.</p> <p>Website link 1: The statement is now readily available by clicking “Nondiscrimination” at the bottom of any page on the WVC website (www.wvc.edu).</p> <p>Directions for use: It includes long form, short form and micro form with specifics on when to use each (based on size and space available).</p> <p>We will work to update and apply the statement to all documents.</p> <p>Website link 2: The statement will be updated on the “affirmative action”</p> | <p>Executive Director of Community Relations</p> | <p>9/30/2019- Will send link</p> | <p>Aug 2019</p> | <p>Website updated</p> |
|---------------------|---|---|--|--------------------------------------|-----------------|------------------------|

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|--------------|---|---|--|---|-----------------|--|
| | <p>the full statement is not included.</p> <p>In addition, the short form of the non-discriminations form should only be used when space for the full-statement is not available</p> | <p>policy link under “public disclosure” after board review and approval.</p> | | | | |
| A.i.2 | <p>A review of 49 brochures, forms, marketing pamphlets, and other documents found that only 6 of the 49 documents had a complete and accurate non-discrimination statements. Issues included no non-discrimination statement on the form at all (28 instances), coordinator information not listed (8 instances), use of short form without a link to the actual statement (5 instances) and various other issues.</p> | <p>The statement has been updated and is now being applied to all new documents made available to the public.</p> <p>The statement is being updated on existing documents.</p> <p>The short and micro forms include a link to the full statement.</p> | <p>Executive Director of Community Relations</p> | <p>9/30/2019- Will send samples</p> | <p>12/30/19</p> | <p>Reviewed the following and found a complete statement, along with coordinator information: * 19-20 Catalog * 12/19 Machining program brochure * 19-20 Quick Facts * 12/19 RN to BSN brochure 12/19 RN to BSN poster 19-20 Student Handbook Fall 19 Discover publication</p> |

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| | | | | | | *19-20 General Brochure *WVC SAP Appeal Form *10/19 Wildfire Education program |
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Required Action:

In accordance with the Title IX and Section 504 regulations, 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. In addition, recipients should post a non-discrimination statement on the college's main webpage in an easily accessible location.

To meet these requirements, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

(ii) Title IX, Section 504, and Title II Coordinators:

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use individuals' names for the contact information, but it is not necessary. Identification of the coordinator's title is sufficient.

Results of Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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|--------------------|--|--|--|--|-------------|--|
| <p>A.ii</p> | <p>Non-Compliance: The college has designated the Executive Director of HR as the employee responsible for coordinator for Section 504, Title II and Title IX however, most employees and students interviewed were not aware of the identity of the coordinator. In addition, as previously noted, the information on the coordinator was not posted on many of the non-discrimination notices reviewed.</p> | <p>Title IX info about Coordinator has been added to college website and non-discrimination statement.</p> <p>The statement will be applied to all publicly available documents.</p> | <p>Executive Director of Community Relations</p> | <p>9/30/2019- Will email all staff, student and faculty also. Will send links and samples.</p> | <p>9/19</p> | <p>Reviewed the following and found a complete statement, along with coordinator information: *19-20 Catalog * 12/19 Machining program brochure * 19-20 Quick Facts * 12/19 RN to BSN brochure 12/19 RN to BSN poster 19-20 Student Handbook Fall 19 Discover publication *19-20 General Brochure *WVC SAP Appeal Form *10/19 Wildfire</p> |
|--------------------|--|--|--|--|-------------|--|

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|---|--|--|--|--|--|-------------------|
| | | | | | | Education program |
| <p>Required Action:</p> <p>In accordance with the Title IX and Section 504 regulations, 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. In addition, recipients should post a non-discrimination statement on the college's main webpage in an easily accessible location.</p> <p>To meet these requirements, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at: http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html. As required, the statement must contain identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.</p> | | | | | | |

(iii) Annual Public Notification:

An annual public notice must be issued with a brief summary of the college's admissions requirements and programs offered, prior to the beginning of the school year (before Fall Quarter). The issuance can be done in the local newspaper, the Institution's main website, the Institution's newspaper, other publications, or media that reaches the general public. It also must include the college's non-discrimination statement with title and contact information for the Sec 504 and Title IX coordinator(s).

Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement as well as the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--|----------------------------|----------------------|------------------------|-------------|------------------|-------------------|
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|---------------------|---|--|--|--|---------------|---|
| <p>A.iii</p> | <p>Non-Compliance: WVC has its annual non-discrimination statement published on its website under “Public Disclosure/Annual Public Notice of Career and Technical Education Opportunities.” The statement is available both in English and Spanish, but the notice does not include age as a protected category.</p> <p>In addition, the college also published the non-discrimination statement in its Continuing Education Catalog/Discover magazine, distributed to all of the surrounding counties. These statements also omitted “age” as a protected category.</p> | <p>Missing info: Age has been added as a protected category to the annual statement.</p> <p>Website and dual languages: The annual statement is updated on the website in English and Spanish.</p> <p>Publications: The next published statement for fall quarter will happen in August. It will be updated in the Continuing Education/ Discover Magazines at that time.</p> <p>English language skills: The statement contains assurances that lack of English skills will not be a barrier.</p> | <p>Executive Director of Community Relations</p> | <p>8/31/2019 – Will send me a copy</p> | <p>9/2019</p> | <p>Received copy of WVC Discover Magazine, mailed out to all individuals in the general area.</p> |
|---------------------|---|--|--|--|---------------|---|

Required Action:

The College must disseminate an annual public notice of non-discrimination, in English, prior to the beginning of the school year (before Fall Quarter). The annual notice must include a brief summary of the program offerings and admission criteria, and the names/titles, office address, and phone number of persons designated to coordinate compliance under Title IX and Section 504. The notice must be distributed in a manner that would reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area.

In addition, since the college has acknowledged that its service area includes one or more “communities of national origin minority persons with limited English language skills”, it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them. The statement must also include language indicating that lack of English language skills will not be a barrier to attaining an education at the college.

(iv) Grievance Procedures:

Federal law requires colleges to adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|--|---------------------------------------|------------------------------|-------------------------|--|
| A.iv | Non-Compliance: Although WVC has a policy on grievance procedures (1000.350), the policy was not found on the college’s website and the majority of staff and students interviewed were not aware of the policy. A search of the college’s website only found a page discussing and referring the reader to RCW’s specific to disability issues and outside investigative agencies. | Move policies/procedures to new college website which will allow them to be easily searchable. | Executive Director of Human Resources | 9/30/2019 – Will send a link | 11/22/19 | Verified thru website policy is now available. See https://www.wvc.edu/humanresources/policies-procedures/index.html |

Required Action:

The College should provide employees and students with a copy of the college’s Complaint Procedure policy and take appropriate measures to notify its students and employees that there is a grievance procedure for individuals who feel they are the victim of discrimination and harassment. In addition, WVC should take measures to ensure the procedures are readily available to students and employees by making the policy easily available on-line or other appropriate locations such as the employee and student handbooks, catalog, etc.

B SITE LOCATION AND STUDENT ELIGIBILITY CRITERIA

Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability. Issues that could result in discrimination or segregation include the selection of sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, national origin, sex, or disability.

(i) Student Eligibility:

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|---|---|---|-------------------------|--------------------------|
| B.i | Non-Compliance: WVC has an open enrollment policy for the majority of its programs, as required by State law. However for participation in the college’s fire science program, students must be affiliated with a local fire station and be accepted as a volunteer firefighter. The college does not have a written agreement with local fire departments and as such, cannot guarantee that these local agencies are following the required civil rights rules. | WVC is committed to creation of formalized agreements with local businesses and organizations that ensure disabilities will be reasonably accommodated in clinical, workplace, and community locations. | Vice President for Student Services Vice President for Instruction | 12/31/2019- Will send a copy of contract(s). | | |

Required Action:

The College should make necessary changes to the fire science program to guarantee access all eligible students, regardless of their membership in a protected group. To achieve this, WVC should establish written agreements with partner fire departments requiring

these local entities follow the college's open enrollment policy. In addition, the college should ensure all prerequisites used to accept potential students as volunteer firefighters/fire science students are strictly established and only relate to the educational component of the program and not requirements for obtaining a job as a firefighter.

(ii) Site Selection and Modifications:

Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. In addition, a recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|--|---|---|---|------------------|-------------------|
| B.ii | Non-Compliance: WVC has an unofficial partnership with local fire departments which requires students to complete part of their studies at the college and the other half at a local fire station. Since the fire station is not part of the college and there is no written agreement with the fire stations, WVC cannot ensure the sites are accessible to all community members. | WVC is committed to creation of formalized agreements with local businesses and organizations that ensure disabilities will be reasonably accommodated in clinical, workplace, and community locations. | Vice President for Student Services Vice President for Instruction | 12/31/2019- Will send a copy of contract(s). | | |

Required Action:

WVC should take measures to ensure the fire stations used for training are accessible to all community members and enter written agreements with these local municipalities requiring them to provide accessible facilities and sites to all students participating in the Fire Science program.

(iii) Residency:

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| B.iii | The review did not find any areas of non-compliance. | | | | | |

C RECRUITMENT

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should represent persons of different races, national origins, sexes, and disabilities.

(i) Recruitment Activities:

Recipients must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| C.i | The review did not find any areas of non-compliance. | | | | | |

(ii) Recruitment Materials:

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| C.ii | The review did not find any areas of non-compliance. | | | | | |

(iii) Recruitment Teams:

To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| C.iii | The review did not find any areas of non-compliance. | | | | | |

(iv) Counseling LEP/Sensory Impairments:

Recipients must ensure that counselors can effectively communicate with limited English proficiency and with students with sensory impairments.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| C.iv | The review did not find any areas of non-compliance. | | | | | |

(v) **Promotional Effects:**

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|---|---|--|-------------------------|---|
| C.v | Non-Compliance: A review of pictures for various programs in magazines and brochures found many perpetuating stereotypes. The photographs used for Engineering Technology, Electronics, Engineering, and Fire Sciences only depicted males, with the Fire Sciences picture only containing white males. The photographs for Nursing Assistance and RN programs showed all females, except for the Nursing Assistant picture which had 5 females and one male. | New photos have been taken for Machining and CNA Fast Track. The college will continue to update photos for all advertisements going forward to ensure more diversity is included in visual advertising. | Executive Director of Community Relations | 9/30/2019- Will send examples of pictures | 12/2019 | Reviewed the following pictures: -Machining (shows female) -RN to BSN brochure and poster (two males) -Fire Services (all female) -Nursing Assistant (African-American) |

Required Action:

The college should take steps to ensure all pictures and illustrations contained in promotional and advertising material portray a variety of individuals of different sexes, national origins, and individuals with disabilities. The college should take measures to ensure material being used does not contain pictures that perpetuate stereotypes.

(vi) Promotional Effects:

If a recipient's service area contains a community with person of limited English proficiency, information must be available to that community in its language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| C.vi | The review did not find any areas of non-compliance. | | | | | |

D ADMISSIONS

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, age, or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex, age, or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

(i) Discriminatory Criteria:

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, age or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.i | The review did not find any areas of non-compliance. | | | | | |

(ii) Preadmission Inquiries:

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.ii | The review did not find any areas of non-compliance. | | | | | |

(iii) Disabled & Employment Limitation:

A recipient must not deny access to vocational and academic programs or courses to students with a disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.iii | The review did not find any areas of non-compliance. | | | | | |

(iv) LEP & Benefit Limitation:

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.iv | The review did not find any areas of non-compliance. | | | | | |

(v) Preadmission Tests:

Postsecondary admission tests are selected and administered in such a way that they accurately reflect the aptitude with impaired sensory, vocal, or speaking skills rather than measuring the disability (except where these skills are factors the tests purport to measure).

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.v | The review did not find any areas of non-compliance. | | | | | |

(vi) Disability Inquiries:

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.vi | The review did not find any areas of non-compliance. | | | | | |

E STUDENT FINANCIAL ASSISTANCE

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination to access to total scholarships on the basis of sex, race, national origin, or disability.

While this is primarily a postsecondary issue, secondary schools helping to prepare students for postsecondary experiences can help disadvantaged students by being aware of this requirement because financial aid is often the stumbling block for those historically underrepresented in postsecondary education.

Interviews with the following persons may clarify compliance with this standard: Financial Aid Director, Financial Aid Counselor, Guidance Counselors, Department Chairs, Title IX Coordinator, 504/ADA Coordinators.

(i) Financial Assistance Availability:

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.i | The review did not find any areas of non-compliance. | | | | | |

(ii) Sex Restricted Awards:

Sex restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.ii | The review did not find any areas of non-compliance. | | | | | |

(iii) Equitable Financial Aid Information:

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
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|--------------|---|--|------------------------------------|---------------------------------|---------|--|
| E.iii | Non-Compliance: The review of financial aid information and materials provided by WVC and on the college's website did not find any indication of bias. In addition, information appears to have been equitably written, however none of the forms and information brochures reviewed had a non-discrimination notice. | The statement will be applied to all publicly available financial aid forms and documents. | Associate Dean of Student Services | 9/30/2019- Will send samples | 12/2019 | Financial Aid for SAP appeal form (FAFSA is federal) |
|--------------|---|--|------------------------------------|---------------------------------|---------|--|

Required Action:

In accordance with the Title IX and Section 504 regulations, 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. In addition, recipients should post a non-discrimination statement on the college's main webpage in an easily accessible location.

To meet these requirements, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

(iv) LEP Financial Aid Information:

National origin minority persons with limited English language skills receive information about financial assistance in their own language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.iv | The review did not find any areas of non-compliance. | | | | | |

F COUNSELING AND PREVOCATIONAL PROGRAMS

Issues relating to counseling and pre-vocational programs may include steering students towards particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustrations.

(i) Counseling Materials & Activities:

Recipients must ensure that counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, age, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.i | The review did not find any areas of non-compliance. | | | | | |

(ii) Directing or Profiling:

Counselors must not direct students into programs based on their race, color, national origin, sex, age, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular field or program or measure or predict a student’s prospects for success in any career or program, based upon the student’s race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.ii | The review did not find any areas of non-compliance. | | | | | |

(iii) Directing Toward Restrictive Career:

Recipients may not counsel disabled students toward more restrictive career objectives than non-disabled student with similar abilities and interests.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.iii | The review did not find any areas of non-compliance. | | | | | |

(iv) Disproportionate Enrollment:

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.iv | The review did not find any areas of non-compliance. | | | | | |

G SERVICES FOR STUDENTS WITH DISABILITIES

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for axillary aids. Section 504 and ADA Title II are based upon the premise that students with disabilities will be integrated with their non-disabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function and the able-bodied should not put them in a position where they might be “uncomfortable.” However, research shows that gains made by person with disabilities in the educational settings are enhanced when they are integrated with the appropriate aids and services. The Section 504 requirements for services for elementary and secondary disabled students are different from the requirements for services for postsecondary students with disabilities.

(i) **SWD Access to Programs:**

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|---|---|---|-------------------------|--------------------------|
| G.i | Non-Compliance: WVC has unwritten partnerships with local businesses and organizations in order to provide clinical and hands-on experience to students in certain programs. The college does not have written agreements with these organizations and therefore cannot ensure that disabilities of students will be accommodated. Currently, the college has a student with a service animal enrolled in a program requiring clinical hours for completion of the program, and the participating businesses are unable to accommodate the service animal. | WVC is committed to creation of formalized agreements with local businesses and organizations that ensure disabilities will be reasonably accommodated in clinical, workplace, and community locations. | Vice President for Student Services Vice President for Instruction | 12/31/2019- Will send a copy of contract(s). | | |

Required Action:

WVC should enter formal agreements with any organization or business used to provide students with required clinical experience and/or training to ensure the entity will provide required accommodations to individuals with disabilities. In instances where an individual's disability cannot be reasonably accommodated, the college must create alternative plans and curriculum to ensure the student is able to receive the same educational opportunities and training as their peers.

(ii) Equipment Barriers:

Disabled students must not be excluded from vocational career or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.ii | The review did not find any areas of non-compliance. | | | | | |

(iii) Postsecondary 504 Services:

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete a degree program and/or licensure requirements.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|---|---|---|-------------------------|--------------------------|
| G.iii | Non-Compliance: WVC has unwritten partnerships with local businesses and organizations in order to provide clinical and hands-on experience to students in certain programs. The college does not have written agreements with these organizations and therefore cannot ensure that disabilities of students will be accommodated. Currently, the college has a student with a service animal enrolled in a program requiring clinical hours for completion of the program, and the participating | WVC is committed to creation of formalized agreements with local businesses and organizations that ensure disabilities will be reasonably accommodated in clinical, workplace, and community locations. | Vice President for Student Services Vice President for Instruction | 12/31/2019- Will send a copy of contract(s). | | |

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|--|--|--|--|--|--|--|
| | businesses are unable to accommodate the service animal. | | | | | |
|--|--|--|--|--|--|--|

Required Action:
WVC should enter formal agreements with any organization or business used to provide students with required clinical experience and/or training to ensure the entity will provide required accommodations to individuals with disabilities. In instances where an individual's disability cannot be reasonably accommodated, the college must create alternative plans and curriculum to ensure the student is able to receive the same educational opportunities and training as their peers.

(iv) Services for Students with Disabilities:

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|---|---|---|-------------------------|--------------------------|
| G.iv | Non-Compliance: WVC has unwritten partnerships with local businesses and organizations in order to provide clinical and hands-on experience to students in certain programs. The college does not have written agreements with these organizations and therefore cannot ensure that disabilities of students will be accommodated. Currently, the college has a student with a service animal enrolled in a program requiring clinical hours for completion of the program, and the participating businesses are unable to accommodate the service animal. | WVC is committed to creation of formalized agreements with local businesses and organizations that ensure disabilities will be reasonably accommodated in clinical, workplace, and community locations. | Vice President for Student Services Vice President for Instruction | 12/31/2019- Will send a copy of contract(s). | | |

Required Action:

WVC should enter formal agreements with any organization or business used to provide students with required clinical experience and/or training to ensure the entity will provide required accommodations to individuals with disabilities. In instances where an individual's disability cannot be reasonably accommodated, the college must create alternative plans and curriculum to ensure the student is able to receive the same educational opportunities and training as their peers.

(v) Evaluation Accommodations & Modifications:

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes or achievement levels or other relevant factors are measured and not the disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| G.v | The review did not find any areas of non-compliance. | | | | | |

(vi) Equitable Housing Opportunities:

Students receive equitable opportunities from housing programs regardless of sex, national origin, color, race, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| G.vi | The review did not find any areas of non-compliance. | | | | | |

(vii) Comparable & Accessible Housing:

The institution offers students with disabilities on campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.vii | The review did not find any areas of non-compliance. | | | | | |

(viii) Off-Campus Housing:

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their race, sex, color, national origin, age, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|---------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.viii | Not Applicable – WVC does not provide off-campus housing | | | | | |

(ix) Landlords:

The institution does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, age, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.ix | Not Applicable – WVC does not cooperate or work with any landlords | | | | | |

H ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities are inaccessible to or unusable by persons with disabilities.

(i) Existing facility under 504 – Built or altered beginning June 3, 1977, or earlier:

A recipient shall operate its program or activity so that when each part is viewed in its entirety, it is readily accessible to disabled persons. A recipient is not required to make each of its existing facilities or every part of a facility accessible to and usable by persons with disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|-------------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| H.i | For results see Attachment A | | | | | |

(ii) Existing facility under 504 – Built or altered beginning June 3, 1977, or earlier:

Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disability. Conformance with the “American National Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by the Physically Disabled” published by the American National Standards Institute, Inc. (ANSI-A117.1-1961 (R1971)). Later versions of ANSI A117.1 do not apply.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|-------------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| H.ii | For results see Attachment A | | | | | |

(iii) New Construction under 504 – Built or altered between January 8, 1991, and January 26, 1992, inclusive New construction under ADA Title II and 504 – Built after January 26, 1992, exercising the option to follow UFAS:

Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities. Conformance with the Uniform Federal Accessibility Standards (UFAS) (Appendix A to 41 CFR subpart 101.19.6). Departures from particular technical and scoping requirements are permitted where substantially equivalent or greater access to and usability of the building is provided.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|-------------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| H.iii | For results see Attachment A | | | | | |

(iv) New Construction under ADA Title II and 504 – Built after January 26, 1992, exercising the option to follow ADAAG:

Each facility or part of a facility constructed by, on behalf of, or for the use of a recipient or public entity is designed and constructed in such a manner that the facility or part of the facility is readily accessible to and usable by persons with disability. Conformance with the Americans with Disability Act Accessibility Guidelines for Buildings and Facilities (ADAAG) (Appendix A to 34 CFR Part 36). Departures from particular requirements are permitted when it is clearly evident the equivalent access to the facility or part of the facility is thereby provided.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|-------------------------------------|----------------------|------------------------|-------------|------------------|-------------------|
| H.iv | For results see Attachment A | | | | | |

J COMPARABLE FACILITIES

Separate facilities for student with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers, and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female or students with disabilities should be located in similar proximity to the associated classroom, shops, or laboratories.

(i) New Construction under ADA Title II and 504 – Built after January 26, 1992, exercising the option to follow ADAAG:

If separate programs or facilities exist for students with disabilities, they are comparable to those for students without disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|-------------------------------------|----------------------|------------------------|-------------|------------------|-------------------|
| J.i | For results see Attachment A | | | | | |

(ii) Changing Rooms & Showers:

Changing rooms, showers, and other facilities for students of one sex are comparable to those provided to students of the other sex.

Changing rooms, showers, and other facilities for students with disabilities are comparable to those provided to students without disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|------------------------------|----------------------|------------------------|-------------|------------------|-------------------|
| J.ii | For results see Attachment A | | | | | |

K WORK STUDY, COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICE TRAINING

An agency not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. It is necessary to review these written agreements, the assignment of students presently in such programs, and the placement process to see whether any such patterns exist.

(i) Work Study & Job Placement:

Opportunities in work study cooperative education and job placement programs are available to all students regardless of race, color, national origin, sex, age or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-----|--|----------------------|------------------------|-------------|------------------|-------------------|
| K.i | The review did not find any areas of non-compliance. | | | | | |

(ii) Employer Agreements:

A recipient that assists employers or prospective employers in making employment opportunities available to any students must ensure the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, and pay.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|---|---|---|---|------------------|-------------------|
| K.ii | Non-Compliance: WVC does not have formal agreements with employers and businesses used for Co-Op education or those used to provide students with work experience. | WVC is committed to creation of formalized agreements with local businesses and organizations that ensure disabilities will be reasonably accommodated in clinical, workplace, and community locations. | Vice President for Student Services Vice President for Instruction | Completion by end of fall quarter, 2019 | | |

Required Action:

The college should enter into written agreements with all partner businesses and agencies providing work experience and job opportunities to students to ensure these organizations do not act on a discriminatory basis. In addition, the college should monitor the patterns of hiring, placement, assignment of work tasks, hours of employment, and level of responsibility for students participating in these programs to ensure no disparity exists.

L APPRENTICESHIP TRAINING PROGRAMS

In the same way that an employer may not discriminate and the educational agency may not work with any that do discriminate, it also has the responsibility to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. Written agreements are recommended wherein the apprenticeship program indicates it will not discriminate on these bases. It is necessary to review apprenticeship assurance forms, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(i) Apprenticeship Agreements:

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or

disability. A written agreement between the institution and the labor union or other sponsor includes an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| L.i | The review did not find any areas of non-compliance. | | | | | |

M EMPLOYMENT

Recipients are prohibited from engaging in any employment practices that discriminate against employee or applicants for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

(i) Employment Practices:

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, age, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|--|---------------------------|---|------------------|--|
| M.i | Non-Compliance: The review found no evidence of non-compliance in the general employment practices of the college for faculty and staff. The college has strong policies and procedures designed to ensure that there is no discrimination or appearance of discrimination in general employment. However, WVC does not follow these same guidelines for students. Student | All student employment positions are advertised on the WVC website. All applications are collected in the career center and then delivered to the supervisors with interview guidelines and a list of potential interview questions. | Career Center Coordinator | 9/30/2019- Will send copies of guidelines, interview questions. | 12/2019 | Reviewed guidelines and sample questions for interviews. |

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|--|--|--|--|--|--|
| <p>positions are posted on a board and students directly contact the position supervisor to apply for these jobs. These supervisors do not receive any training or information on best practices and/or civil rights laws. The screening process, questions asked of applicants and the materials used during the process of selecting student employees are created and used by each individual supervisor and are not reviewed or managed by the college's human resource department. During interviews the need for supervisory, civil rights, and title IX training for those who supervise students was mentioned by staff and faculty.</p> | | | | | |
|--|--|--|--|--|--|

Required Action:
WVC should establish more formal processes and practices for hiring Work Study students to ensure there is no discrimination or appearance of discrimination. Recommended policies and practices should include training supervisors of Work Study students on prohibited practices, creating standardized applications or interview questions, and monitoring Work Study hires to ensure there are no patterns that could indicate possible discrimination or bias.

(ii) Employment Recruitment Notification:

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
|--|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|

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|-------------|--|---|--------------------------|--|--|--|
| M.ii | Non-Compliance: All position announcement and job postings reviewed contained a complete and accurate non-discrimination statement, but WVC's application for employment does not include a non-discrimination statement. | Added statement to WVC employment application-Will send application | Executive Director of HR | 1/31/2019-Will send copy of application. | | |
|-------------|--|---|--------------------------|--|--|--|

Required Action:

In accordance with the Title IX and Section 504 regulations, 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. In addition, recipients should post a non-discrimination statement on the college's main web page in an easily accessible location.

To meet these requirements, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

(iii) Salary Scales & Assignments:

The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| M.iii | The review did not find any areas of non-compliance. | | | | | |

(iv) Equal Opportunities & Reasonable Accommodations:

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| M.iv | The review did not find any areas of non-compliance. | | | | | |

| 8 | Accessibility | | | | | | |
|----------|----------------------------|---|---|-----------------------|-------------|-----------------|--------------|
| | Compliance during visit? | | No | | | | |
| | | | | | | | |
| ID | Evidence of Non-Compliance | | Resolution | Person(s) Responsible | Target Date | Completion Date | Confirm Date |
| S-1 | Tracking Number | ADA0445 | WO 116326 - accessible signs and labels were removed from parking that was out of compliance. | Charles Baumann | | Summer 2019 | 10/22/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | ADA for 101 to 150 stalls | | | | | |
| | Near Building | Wells | | | | | |
| | Non-Compliance | The lot does not have the required number of accessible parking spaces. | | | | | |
| | Required Action | Provide at least five accessible parking spaces. At least one space must be van accessible. | | | | | |

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|-----|---------------------------|---|---|------------|-----------|--|--|
| | Notes | The three stalls marked as accessible are not located on an accessible route and do not have striping between stalls. These three are not required since the total number of accessible stalls exceeds the requirement without them. College can turn them into regular stalls. | | | | | |
| S-2 | Tracking Number | ADA0446 | WO 116326 - Incomplete due to pending Well's Hall demolition. Van spot was added in lower level of BLM. | C. Baumann | 8/30/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | Access aisles - 90 degree parking stalls | | | | | |
| | Near Building | Wells | | | | | |
| | Non-Compliance | Parking spaces are not accessible because they are not the correct width or they do not have an | | | | | |

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|-----|---------------------------|--|-----------|------------|--|-------------|------------|
| | | appropriate access aisle. | | | | | |
| | Required Action | Provide accessible parking with the required width and access aisle. | | | | | |
| | Notes | Need to provide access aisles between stalls. College can omit two stalls for paint stripes since there are more than the required accessible stalls in this lot. (Per Rich: add van spot at lower level of BLM) | | | | | |
| S-3 | Tracking Number | ADA0447 | WO 116326 | C. Baumann | | Summer 2019 | 10/28/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | Access aisles - angled stalls | | | | | |
| | Near Building | Gym | | | | | |
| | Non-Compliance | Parking spaces are not accessible because they | | | | | |

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|-----|---------------------------|---|-----------|------------|--|-------------|------------|
| | | are not the correct width or they do not have an appropriate access aisle. | | | | | |
| | Required Action | Provide accessible parking with the required width and access aisle. | | | | | |
| | Notes | Striping required between stalls for access isles. College could use two of the stalls for striping since they have more than the required number of accessible stalls for this lot. Also, signs must be raised to at least five feet above the surface of the parking lot. | | | | | |
| S-4 | Tracking Number | ADA0448 | WO 116326 | C. Baumann | | Summer 2019 | 10/28/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |

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|-----|---------------------------|--|-----------|------------|--|-------------|------------|
| | Parameter | Access aisles - angled stalls | | | | | |
| | Near Building | Gym | | | | | |
| | Non-Compliance | Parking spaces are not accessible because they are not the correct width or they do not have an appropriate access aisle. | | | | | |
| | Required Action | Provide accessible parking with the required width and access aisle. | | | | | |
| | Notes | Parking on west side of lot does not have required access aisles. College can omit three of the accessible stalls to provide striping for access aisles. | | | | | |
| S-5 | Tracking Number | ADA0449 | WO 116326 | C. Baumann | | Summer 2019 | 10/28/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Signs | | | | | |
| | Parameter | ADA restricted | | | | | |

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|-----|---------------------------|---|--|------------|-----------|--|--|
| | Near Building | New Student Recreation Center | | | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | | |
| | Notes | Signs need to be raised to five feet above surface of parking lot | | | | | |
| S-6 | Tracking Number | ADA0450 | WO 116326 This was not completed before winter weather and covid hit. | C. Baumann | 4/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Signs | | | | | |
| | Parameter | ADA restricted | | | | | |
| | Near Building | Sexton | | | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | | |

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|-----|---------------------------|---|--|------------|--|-------------|------------|
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | | |
| | Notes | All signs for accessible parking must be raised. All accessible stalls must have painted symbol on surface. College can move accessible stall in furthest east location to a location currently reserved for the gallery or omit east accessible stall since there are more accessible spaces than are required for this lot. | | | | | |
| S-7 | Tracking Number | ADA0451 | WO 116326 - ADA sign was posted and will be painted during the next round of striping. | C. Baumann | | Summer 2020 | 10/22/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Signs | | | | | |
| | Parameter | ADA restricted | | | | | |
| | Near Building | Industrial Technology | | | | | |

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|-----|---------------------------|--|--|-----------|-----------|--|--|
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | | |
| | Notes | One accessible stall required in this lot. College can install restrictive sign at stall on west side of building to comply. Sign can be mounted to the building and at least five feet above parking surface. | | | | | |
| S-8 | Tracking Number | ADA0452 | WO 116327 Delayed because of workload and covid | M. Nelson | 5/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Refrig | | | | | |

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|-----|---------------------------|---|--|-----------|-----------|--|--|
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | | | |
| | Notes | Asphalt path and entrance threshold transitions both exceed 3/4" | | | | | |
| S-9 | Tracking Number | ADA0453 | WO 116327 Delayed because of workload and covid | M. Nelson | 5/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Refrig | | | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level | | | | | |

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|------|---------------------------|--|--|------------|-----------|--|--|
| | | meets the accessibility requirements. | | | | | |
| | Notes | Threshold at building rear entrance is greater than 3/4". | | | | | |
| S-10 | Tracking Number | ADA0457 | WO 116326 - Signs in, concrete will be done as part of current project | C. Baumann | 2/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Ramps | | | | | |
| | Parameter | Slope | | | | | |
| | Near Building | Batjer | | | | | |
| | Non-Compliance | The access ramp is too steep. | | | | | |
| | Required Action | The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than | | | | | |

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|------|---------------------------|---|--|-----------|-----------|--|--|
| | | three (3) inches. | | | | | |
| | Notes | East entrance has a ramp that exceeds the maximum allowed slope. Provide signage directing students to south accessible entrance. | | | | | |
| S-11 | Tracking Number | ADA0469 | VTC Entry Replacement Project - Incomplete due to insufficient funds. We have another approach. Plan to replace a section of Ramp. If bids are favorable this will be complete by August 15th 2020 | R. Peters | 6/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Van Tassell | | | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level meets the | | | | | |

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|-------|---------------------------------------|---|--|-------------|--|-----------|------------|
| | | accessibility requirements. | | | | | |
| | Notes | Transition is roughly 1" | | | | | |
| S-12 | Tracking Number | ADA0470 | WO 116328 - Brick was lifted to eliminate level change. | T. Martin | | 3/29/2019 | 10/22/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (150A) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Van Tassell | | | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | | | |
| Notes | The transition is 3/4" in many areas. | | | | | | |
| S-13 | Tracking Number | ADA0480 | WO 116329 | G. Lisenbey | | 5/7/2019 | |
| | Campus | North Campus | | | | | |
| | Location | Site - North Campus (150B) | | | | | |

| | | | | | | | |
|------|---------------------------|--|-----------|-------------|--|----------|--|
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Signs | | | | | |
| | Parameter | ADA restricted | | | | | |
| | Near Building | Burnett Hall | | | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | | |
| | Notes | Sign is not located in front of accessible stall. Sign needs to be mounted at five feet above the surface of lot. Need to add "van accessible" sign below reserved parking sign. | | | | | |
| S-14 | Tracking Number | ADA0481 | WO 116329 | G. Lisenbey | | 5/7/2019 | |
| | Campus | North Campus | | | | | |
| | Location | Site - North Campus (150B) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 | | | | | |

| | | | | | | | |
|------|---------------------------|---|-----------|-------------|--|----------|--|
| | | \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Burnett Hall | | | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | | | |
| | Notes | Ruts in path need to be repaired. | | | | | |
| S-15 | Tracking Number | ADA0484 | WO 116329 | G. Lisenbey | | 5/7/2019 | |
| | Campus | North Campus | | | | | |
| | Location | Site - North Campus (150B) | | | | | |
| | Yr. Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | Car and van Widths | | | | | |
| | Near Building | North Classroom | | | | | |

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|-----|---------------------------|---|------------------------|------|--|-----------|------------|
| | Non-Compliance | The accessible parking spaces do not comply with the width and access aisle accessibility requirements. | | | | | |
| | Required Action | Provide accessible parking spaces that comply with the width and access aisle requirements. | | | | | |
| | Notes | The access aisle is 3'-0" wide (needs to be 5'-0"). Parking lot needs four accessible stalls. Signs need to be mounted at five feet above surface of lot. | | | | | |
| B-I | Tracking Number | ADA0454 | Furniture was replaced | Team | | Dec. 2018 | 10/22/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Batjer | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1948 \ no ADA standards; readily accessible | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Moveable dining or work surfaces | | | | | |
| | Parameter | Knee clearance | | | | | |
| | In / Near Room | 8006 | | | | | |

| | | | | | | | |
|-----|---------------------------|---|--|-------------|--|--|--|
| | Non-Compliance | There is not enough knee clearance under the table. | | | | | |
| | Required Action | Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. | | | | | |
| | Notes | One table must comply | | | | | |
| B-2 | Tracking Number | ADA0455 | WO 116330 - Pending - Signs will be installed after closure is lifted due to Covid-19.D185 | E. Williams | | | |
| | Campus | Main Campus | | | | | |
| | Location | Batjer | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1948 \ no ADA standards; readily accessible | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Doors | | | | | |
| | Parameter | Front approach with closer - Push side clear area | | | | | |
| | In / Near Room | 8002 | | | | | |
| | Non-Compliance | The door does not have a big enough clear floor area in front of the door. | | | | | |

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|-----|---------------------------|---|----------------|--------------|-----------|--|------------|
| | Required Action | Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) inches in front of the door. | | | | | |
| | Notes | If bathroom cannot be made accessible, provide signage to closest accessible building with accessible bathroom. | | | | | |
| B-3 | Tracking Number | ADA0456 | WO 116331 D229 | Charles/Rich | 7/15/2020 | | incomplete |
| | Campus | Main Campus | | | | | |
| | Location | Batjer | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1948 \ no ADA standards; readily accessible | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Doors | | | | | |
| | Parameter | Clear opening or door with no closer | | | | | |
| | In / Near Room | 8011 | | | | | |

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|-----|---------------------------|--|-----------|------------|--|-----------|-----------|
| | Non-Compliance | The door is too narrow or does not have enough clear area in front of the door. | | | | | |
| | Required Action | Provide an opening that is at least thirty two (32) inches wide and a clear area of at least forty eight (48) inches in front of the opening. | | | | | |
| | Notes | Double doors with closers only allow 24" clearance when one door opened (32" min. required). College can either provide automatic door operators for both sets of doors, remove closers or provide signage to an alternate entrance along an accessible route with accessible parking. | | | | | |
| B-4 | Tracking Number | ADA0458 | WO 116333 | Tom Martin | | 4/24/2019 | 1/21/2020 |
| | Campus | Main Campus | | | | | |
| | Location | Batjer | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1948 \ | | | | | |

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|-----|---------------------------|---|--|-----------|--|----------|------------|
| | | no ADA standards; readily accessible | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Coat hook | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 8039 | | | | | |
| | Non-Compliance | The coat hooks are not located in a reachable range. | | | | | |
| | Required Action | Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. | | | | | |
| | Notes | Hook is at 54" | | | | | |
| B-5 | Tracking Number | ADA0459 | WO 116332 - pipe insulation has been provided. | T. Martin | | 8/1/2019 | 10/28/2019 |
| | Campus | Main Campus | | | | | |
| | Location | GYM | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1958 \ no ADA standards; readily accessible | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Sink | | | | | |
| | Parameter | Exposed pipes | | | | | |
| | In / Near Room | 4004 | | | | | |

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|-----------------|--|---|--|-----------|--|----------|------------|
| | Non-Compliance | The sink drain pipe and hot water lines are not insulated or protected. | | | | | |
| | Required Action | Provide insulation or other protection over the sink drain pipe and hot water line. | | | | | |
| | Notes | (blank) | | | | | |
| B-6 | Tracking Number | ADA0460 | WO 116332 - pipe insulation has been provided. | T. Martin | | 8/1/2019 | 10/28/2019 |
| | Campus | Main Campus | | | | | |
| | Location | GYM | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1958 \ no ADA standards; readily accessible | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Sink | | | | | |
| | Parameter | Exposed pipes | | | | | |
| | In / Near Room | 4017B | | | | | |
| | Non-Compliance | The sink drain pipe and hot water lines are not insulated or protected. | | | | | |
| Required Action | Provide insulation or other protection over the sink drain | | | | | | |

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|-----------------|--|---|--|-------------|-----------|--|--|
| | | pipe and hot water line. | | | | | |
| | Notes | (blank) | | | | | |
| B-7 | Tracking Number | ADA0461 | WO 116330 - Pending - signage received and will be installed after campus closure is lifted. Due to Covid-19 | E. Williams | 6/30/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | GYM | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1958 \ no ADA standards; readily accessible | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Doors | | | | | |
| | Parameter | Front approach with closer - Push side clear area | | | | | |
| | In / Near Room | 4010 | | | | | |
| | Non-Compliance | The door does not have a big enough clear floor area in front of the door. | | | | | |
| Required Action | Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) | | | | | | |

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| | | inches in front of the door. | | | | | |
| | Notes | Both men's and women's bathrooms have multiple physical barriers that are structural. College should provide signs directing students to the nearest accessible bathrooms | | | | | |
| B-8 | Tracking Number | ADA0462 | Folder created with all materials at a reachable height. | R. Peters | | 12/26/2019 | |
| | Campus | Main Campus | | | | | |
| | Location | Eller/Fox | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1984 \ ANSI standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 3016 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the | | | | | |

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| | | accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| | Notes | Upper two rows of the display are outside of reach range. Also need to provide clear area in front of display for front access. | | | | | |
| B-9 | Tracking Number | ADA0463 | WO 116331 - Will install 60" table on lower level. When closure lifts | D. Hauck | 4/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Eller/Fox | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1984 \ ANSI standards | | | | | |
| | Space | Assembly areas / Classrooms | | | | | |
| | Component | Seating | | | | | |
| | Parameter | ADA / 26 to 50 seats | | | | | |
| | In / Near Room | 3015 | | | | | |
| | Non-Compliance | There are not enough accessible seats. | | | | | |

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| | Required Action | Based on the room capacity, provide at least two accessible seats. | | | | | |
| | Notes | No seats are accessible. College can provide a 60" long accessible table allowing for two seats on the lower level. | | | | | |
| B-10 | Tracking Number | ADA0464 | WO 116333 | D. Knutson | | 4/24/2019 | 1/27/2020 |
| | Campus | Main Campus | | | | | |
| | Location | Eller/Fox | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1984 \ ANSI standards | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Coat hook | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 3014 | | | | | |
| | Non-Compliance | The coat hooks are not located in a reachable range. | | | | | |
| | Required Action | Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. | | | | | |
| Notes | Both men's and women's. | | | | | | |

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| B-11 | Tracking Number | ADA0465 | Will install 60" table on lower level, when closure lifts | Rich and Charlie R. to look at | 4/15/2021 | | |
| | Campus | Main Campus | | | | | |
| | Location | Eller/Fox | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1984 \ ANSI standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Built-in dining or work surfaces | | | | | |
| | Parameter | Number ADA | | | | | |
| | In / Near Room | 3003 | | | | | |
| | Non-Compliance | The required number of accessible work stations or other surfaces are not provided. | | | | | |
| | Required Action | Provide accessible work stations or other work surfaces. At least five percent of the total stations provided must be accessible. A minimum of one is required. | | | | | |
| Notes | At least one work station must be accessible. | | | | | | |
| B-12 | Tracking Number | ADA0466 | WO 116332 Accessible sink | T. Martin | 8/15/2021 | 8/1/2019 | Incomplete |

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| | Campus | Main Campus | identified. Will complete when campus closure lifted. | | | | |
| | Location | Eller/Fox | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1984 \ ANSI standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Lavatories and sinks | | | | | |
| | Parameter | Rim height | | | | | |
| | In / Near Room | 3003 | | | | | |
| | Non-Compliance | The sink rim height is too high. | | | | | |
| | Required Action | Locate the sink rim at thirty four (34) inches maximum above the floor. | | | | | |
| | Notes | At least one sink must comply | | | | | |
| B-13 | Tracking Number | ADA0467 | WO 116333 - An additional mirror was provided at ADA height. | D.Knutson | | 4/24/2019 | 10/22/2019 |
| | Campus | Main Campus | | | | | |
| | Location | Van Tassell | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1958 \ no ADA standards; readily accessible | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Mirror above sink | | | | | |

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|------|---------------------------|---|------------------------------|-----------|--|----------|----------|
| | Parameter | Height of btm | | | | | |
| | In / Near Room | Across from café | | | | | |
| | Non-Compliance | The mirror is mounted too high. | | | | | |
| | Required Action | Locate the mirror so that the bottom is located forty (40) above the floor. | | | | | |
| | Notes | Can provide additional mirror. | | | | | |
| B-14 | Tracking Number | ADA0468 | Rich to communicate to staff | R. Peters | | 1/3/2020 | 1/3/2020 |
| | Campus | Main Campus | | | | | |
| | Location | Van Tassell | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1958 \ no ADA standards; readily accessible | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 5001 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located | | | | | |

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| | | within the accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| | Notes | Top row is at 68". | | | | | |
| B-15 | Tracking Number | ADA0471 | Rich to communicate to staff. Materials supplied in single envelope at are accessible height. | R. Peters | | 1/3/2020 | 1/3/2020 |
| | Campus | Main Campus | | | | | |
| | Location | Central Washington Univer | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2002 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 5501 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the | | | | | |

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| | | accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| | Notes | Top of display at 67" | | | | | |
| B-16 | Tracking Number | ADA0472 | WO 116333 - additional hook was provided. | D. Knutson | | 4/24/2019 | |
| | Campus | Main Campus | | | | | |
| | Location | Sexton | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1963 \ no ADA standards; readily accessible | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Coat hook | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 6001 | | | | | |
| | Non-Compliance | The coat hooks are not located in a reachable range. | | | | | |
| | Required Action | Locate coat hooks between fifteen (15) and forty eight (48) | | | | | |

| | | | | | | | |
|------|---------------------------|---|--|-----------|--|-----------|--|
| | | inches above the floor. | | | | | |
| | Notes | Hook at 54" | | | | | |
| B-17 | Tracking Number | ADA0473 | WO 116332 - Tom Completed work in both Men's and Women's restrooms | T. Martin | | 1/15/2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Baseball Concession/restrooms | | | | | |
| | Yr. Built \ Orig Standard | There is no construction age data available. It is estimated that the most recent construction or renovation began in 1992 \ 1991 ADA standards | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Toilet compartment | | | | | |
| | Parameter | Grab bar - back wall length | | | | | |
| | In / Near Room | Enter Number | | | | | |
| | Non-Compliance | The back wall grab bar does not meet the requirements for transfers. | | | | | |
| | Required Action | Provide a grab bar on the back wall that is at least thirty six (36) inches long or at least twenty four (24) inches long if it is obstructed and | | | | | |

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| | | centered on the toilet. | | | | | |
| | Notes | Men's and women's. Back wall grab bar required. Also coat hook is above reach range (48" max) | | | | | |
| B-18 | Tracking Number | ADA0474 | Items cleared off counter | R. Peters | | Completed | 1/3/2020 |
| | Campus | Main Campus | | | | | |
| | Location | Brown Library | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2006 \ 1991 ADA standards | | | | | |
| | Space | Mercantile / Service areas | | | | | |
| | Component | Service or ticket counter | | | | | |
| | Parameter | Height and length of ADA counter | | | | | |
| | In / Near Room | 9200D | | | | | |
| | Non-Compliance | The service counter is too high and/or too narrow. | | | | | |
| | Required Action | Provide a service counter that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or | | | | | |

| | | | | | | | |
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| | | twenty four (24) inches long for a front approach. | | | | | |
| | Notes | Need to clear off counter. | | | | | |
| B-19 | Tracking Number | ADA0475 | A new flyer organizer is being purchased for the accessible area which will have all these materials. | R. Peters | 11/15/2019 | 12/22/2019 | |
| | Campus | Main Campus | | | | | |
| | Location | Wenatchi Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2003 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 2162 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the accessible reach range. | | | | | |
| Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions | | | | | | |

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| | | that restrict access. | | | | | |
| | Notes | Removable material at 60" | | | | | |
| B-20 | Tracking Number | ADA0476 | Rich to chat with Department | R. Peters | | | |
| | Campus | Main Campus | | | | | |
| | Location | Wenatchi Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2003 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 2117 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |

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| | Notes | Top of displays at 60" | | | | | |
| B-21 | Tracking Number | ADA0477 | Installed 3/8 rope and secured to the handle and extended to an acceptable height. This was done in all 5 Lab spaces impacted. The rope needs to be looped at the end. | R. Peters | | 1/10/2020 | 1/15/2020 |
| | Campus | Main Campus | | | | | |
| | Location | Wenatchi Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2003 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 2308 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| Notes | Pull handle at 68" multiple labs | | | | | | |

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|-------|---------------------------|--|------------------------------|-------------|--|-----------|-----------|
| B-22 | Tracking Number | ADA0478 | Rich to chat with department | R. Peters | | 1/15/2020 | 1/21/2020 |
| | Campus | North Campus | | | | | |
| | Location | Burnett Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2011 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | 415 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| Notes | Display height is 65" | | | | | | |
| B-23 | Tracking Number | ADA0479 | WO 116329 | G. Lisenbey | | 6/28/2019 | |

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| | Campus | North Campus | | | | | |
| | Location | Burnett Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 2011 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Protrusions | | | | | |
| | Parameter | 27" to 80" AFF | | | | | |
| | In / Near Room | 415 | | | | | |
| | Non-Compliance | A building element protrudes into the circulation path more than 4". | | | | | |
| | Required Action | Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. | | | | | |
| | Notes | College should provide cane detection element in place on each side of drinking fountain. | | | | | |
| B-24 | Tracking Number | ADA0482 | Alternative class location will be provided if needed. Chio Will be developing a | Glen/Rich/Charlie | 4/15/2021 | | |
| | Campus | North Campus | | | | | |
| | Location | Distance Learning Center | | | | | |

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| Yr. Built \ Orig Standard | Most recent construction or renovation began in 1971 \ no ADA standards; readily accessible | policy to assure alternate space will be made available for classrooms when needed. | | | | |
| Space | General Bldg | | | | | |
| Component | Doors | | | | | |
| Parameter | Clear opening or door with no closer | | | | | |
| In / Near Room | 902 | | | | | |
| Non-Compliance | The door is too narrow or does not have enough clear area in front of the door. | | | | | |
| Required Action | Provide an opening that is at least thirty two (32) inches wide and a clear area of at least forty eight (48) inches in front of the opening. | | | | | |
| Notes | The doorway is 26" wide. The hallway is 34" wide. If modifications are not readily achievable, then equal access to the program or activity must be provided in an alternate location. The college must | | | | | |

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| | | develop a policy to identify an accessible location. | | | | | |
| B-25 | Tracking Number | ADA0483 | WO 116329 | G. Lisenbey | | 6/28/2019 | |
| | Campus | North Campus | | | | | |
| | Location | Distance Learning Center | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1971 \ no ADA standards; readily accessible | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Sink | | | | | |
| | Parameter | Exposed pipes | | | | | |
| | In / Near Room | Enter Number | | | | | |
| | Non-Compliance | The sink drain pipe and hot water lines are not insulated or protected. | | | | | |
| | Required Action | Provide insulation or other protection over the sink drain pipe and hot water line. | | | | | |
| Notes | (blank) | | | | | | |
| B-26 | Tracking Number | ADA0485 | Accessible restrooms are available for use. | G. Lisenbey | | 6/28/2019 | |
| | Campus | North Campus | | | | | |

| | | | | | | | |
|--|---------------------------|---|---|--|--|--|--|
| | Location | North Classroom | Signage will be used to direct to nearest restroom. | | | | |
| | Yr. Built \ Orig Standard | There is no construction age data available. It is estimated that the most recent construction or renovation began in 1992 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Doors | | | | | |
| | Parameter | Front approach with closer - Push side clear area | | | | | |
| | In / Near Room | 310 | | | | | |
| | Non-Compliance | The door does not have a big enough clear floor area in front of the door. | | | | | |
| | Required Action | Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) inches in front of the door. | | | | | |

| | | | | | | | |
|------|---------------------------|--|--|-----------|--|------------|-----------|
| | Notes | If modifications are not readily achievable, then equal access to the program or activity must be provided in an alternate location. There is 36" clear in front of door (needs to be 48"). The college can provide a sign directing students to the accessible bathroom in the adjacent building. | | | | | |
| B-27 | Tracking Number | ADA0486 | All materials are provided/duplicated at a reachable height. | R. Peters | | 11/15/2019 | 1/14/2020 |
| | Campus | North Campus | | | | | |
| | Location | North Classroom | | | | | |
| | Yr. Built \ Orig Standard | There is no construction age data available. It is estimated that the most recent construction or renovation began in 1992 \ 1991 ADA standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |

| | | | | | | | |
|------|---------------------------|---|-----------|-------------|--|-----------|--|
| | In / Near Room | 310 | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| | Notes | The display height is 66". | | | | | |
| B-28 | Tracking Number | ADA0487 | WO 116329 | G. Lisenbey | | 6/28/2019 | |
| | Campus | North Campus | | | | | |
| | Location | North Classroom | | | | | |
| | Yr. Built \ Orig Standard | There is no construction age data available. It is estimated that the most recent construction or renovation began in 1992 \ 1991 ADA standards | | | | | |
| | Space | Bathroom | | | | | |
| | Component | Coat hook | | | | | |

| | | | | | | | |
|------|---------------------------|---|-------------------|-----------|--|-----------|--|
| | Parameter | Height | | | | | |
| | In / Near Room | 307 | | | | | |
| | Non-Compliance | The coat hooks are not located in a reachable range. | | | | | |
| | Required Action | Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. | | | | | |
| | Notes | Can provide additional hooks at 48" | | | | | |
| B-29 | Tracking Number | ADA0488 | Items moved lower | R. Peters | | Completed | |
| | Campus | North Campus | | | | | |
| | Location | Friendship Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1981 \ ANSI standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Reach range - Fixed storage, shelving, hooks & displays | | | | | |
| | Parameter | Height | | | | | |
| | In / Near Room | Enter Number | | | | | |
| | Non-Compliance | The materials or other components provided for students are not located within the | | | | | |

| | | | | | | | |
|------|---------------------------|--|-----------|-------------|--|-----------|--|
| | | accessible reach range. | | | | | |
| | Required Action | Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. | | | | | |
| | Notes | Top of display at 68" | | | | | |
| B-30 | Tracking Number | ADA0489 | WO 116329 | G. Lisenbey | | 6/28/2019 | |
| | Campus | North Campus | | | | | |
| | Location | Friendship Hall | | | | | |
| | Yr. Built \ Orig Standard | Most recent construction or renovation began in 1981 \ ANSI standards | | | | | |
| | Space | General Bldg | | | | | |
| | Component | Moveable dining or work surfaces | | | | | |
| | Parameter | Knee clearance | | | | | |
| | In / Near Room | Enter Number | | | | | |
| | Non-Compliance | There is not enough knee clearance under the table. | | | | | |
| | Required Action | Provide adequate knee clearance under a minimum of five percent of all tables provided. At | | | | | |

| | | | | | | | |
|--|-------|--|--|--|--|--|--|
| | | least one table must comply with the requirements. | | | | | |
| | Notes | Clear height is 25" | | | | | |

ATTACHMENT B
BIG BEND COMMUNITY
COLLEGE

State Board for Community and Technical Colleges

Civil Rights Compliance Review Letter of Findings



Big Bend Community College
September 3, 2019

FOREWORD

The Methods of Administration (MOA) Coordinator for the State Board for Community and Technical Colleges (SBCTC) performed an on-site review at Big Bend Community College (the “college”) during the week of April 15 to 19, 2019. As a recipient of federal financial assistance, Big Bend Community College is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) requires each state agency responsible for administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs that receive federal assistance from the U.S. Department of Education. The purpose of the on-site review was to determine the college’s compliance with the guidelines and the following federal laws and regulations:

- Title VI of the *Civil Rights Act of 1964* (Title VI) and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 (Title IX) and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the *Rehabilitation Act of 1973* (Section 504) and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the *Americans with Disabilities Act of 1990* (Title II) and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

While it was not the purpose of this review to assess the college’s compliance with Washington State civil rights laws and regulations, the college should also be aware of these requirements contained in Chapter 49.60 RCW and Title 162 WAC.

Please note that although the resolutions to the items noted in the Letter of Findings (LOF) will complete the college’s obligations in regards to this review, compliance with civil rights requirements is an ongoing obligation requiring continued internal monitoring and effort.

Big Bend Community College was selected for review based on the State of Washington’s 2017-19’s Targeting Plan, which requires review of subrecipients with the highest disparities between their total enrollment and their Career Technical Education (CTE) enrollment on the basis of race, sex, and disability. The targeting plan also uses other optional rating criteria for selection of colleges to be reviewed. These additional criteria include the length of time since a college was last reviewed, and disparities between total completion rates and CTE completion rates on the basis of race, sex, and disabilities.

This LOF summarizes SBCTC’s findings in the following twelve major areas of review:

- M. Administrative Requirements
- N. Site Location and Student Eligibility Criteria

- O. Student Recruitment
- P. Admissions
- Q. Student Financial Assistance
- R. Counseling and Prevocational Programs
- S. Services for Students with Disabilities
- T. Accessibility
- U. Comparable Facilities
- V. Work Study, Cooperative Education, and Job Placement
- W. Apprenticeship Training Programs
- X. Employment

This LOF describes any finding of non-compliance for which corrective action is required. *The “Non-Compliance” sections of this letter require a response.* “Recommendations” do not require responses, but are intended to advise the college of ways the educational experience might be made more accessible to students from protected groups.

Please use the Voluntary Compliance Plan (VCP) template attached to provide the college’s responses to findings of non-compliance. At a minimum, the VCP should address the following:

- How the college will remedy each item of non-compliance (*Resolution/Work Done* column);
- The identity and contact information for the individual responsible for completing the corrective action plan (*Person Responsible* column); and
- A target completion date (month and year) (*Target Date* Column).

Please note the other two columns are for use by SBCTC’s MOA Coordinator when confirming the completion of the required corrective action. Finally, the completed VCP should be signed at the bottom by an individual at the college with sufficient authority to ensure all corrective actions noted are performed as described and by the target dates.

The completed VCP must be returned to SBCTC by November 4, 2019. If the college is unable to meet this deadline, please contact Maryam Jacobs, SBCTC’s MOA Coordinator at (360) 704-4389 or mjacobs@sbctc.edu as soon as possible to discuss an alternate completion date. Once the college’s response has been submitted, SBCTC will review the VCP, and either approve it as is, or will work with you to ensure that the appropriate corrective action is taken to bring the college into compliance.

In each subsection below, the “Non-compliance” section is followed by the federal regulation citations. In the case of facilities, the regulations in effect at the time of building construction or alteration are cited.

Commendations

- Without exception, the review found students are well supported and a priority for all employees. All students interviewed had positive experiences at the college and all reported feeling supported and encouraged. All employees interviewed expressed a strong commitment to serving and supporting students and reported that despite the many recent changes on campus and low morale reported at the college in past few years, the staff had been able to shield students from these internal issues. The commitment to providing a supportive and inclusive education experience at the college is highly commendable.
- The college's Accessibility Coordinator was reported by all campus members, both students and employees, to provide exceptional service to individuals with disabilities. Those interviewed reported that the Coordinator was approachable and supportive of students and provided any needed accommodations with efficiency and speed. Of note is the coordinators ability to shield students needing accommodations from the management, negotiation and discussions required to facilitate these accommodations across campus.
- The college has assembled a "Rapid Response Team" to quickly and efficiently respond to any business closures and rapid lay-offs in the community. The team visits affected business as soon as the college becomes aware of possible upcoming changes and provides displaced workers with information on college programs, career options, and educational benefits. The group's work is an excellent tool to reach community members and increase the college's visibility in the community.

Section A-Administrative

Recipients must have certain basic requirements in place to comply with Department of Education's Office of Civil Rights (OCR) Guidelines, Title VI, Title IX, Section 504 and Title II. These basic procedures include the following: an annual public notice; continuous non-discrimination notification; designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II; and a grievance procedure that will allow students an avenue for dealing with alleged discrimination. To verify this, we reviewed numerous documents and electronic materials, and conducted interviews with administrators, Title IX and Section 504 coordinators, students, staff and faculty.

A.i - Continuous Notification

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the college that the college does not discriminate on the basis of race, color, national origin, sex, disability.

Non-Compliance:

The college's website contains a complete and accurate non-discrimination statement, but an accurate and complete non-discrimination statement was not included on the

publications and materials reviewed. A review of 35 printed brochures, forms, marketing pamphlets, and other documents found that none of the publications had the complete and accurate non-discrimination statement. Issues noted included no non-discrimination statement on the form, coordinator information not being listed, use of a shorten form without a link to the actual statement, and various other issues. The college's 2018-19 Course Catalog has the non-discrimination statement included under "Discrimination" on page 15, but sex is not included as a protected category and information on the coordinators is not included.

Criteria:

28 CFR § 35.106 - A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

34 CFR §100.6(d) - Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §104.8(a) – A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a)... "Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications."

34 CFR §104.8 (b) – If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

34 CFR §106.9 - (a) Notification of policy. (1) Each recipient shall implement specific and continuing steps to notify applicants for admission and employment, students and

parents of elementary and secondary school students, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient, that it does not discriminate on the basis of sex in the educational program or activity which it operates, and that it is required by title IX and this part not to discriminate in such a manner. Such notification shall contain such information, and be made in such manner, as the Assistant Secretary finds necessary to apprise such persons of the protections against discrimination assured them by title IX and this part, but shall state at least that the requirement not to discriminate in the education program or activity extends to employment therein, and to admission thereto unless Subpart C does not apply to the recipient, and that inquiries concerning the application of title IX and this part to such recipient may be referred to the employee designated pursuant to §106.8, or to the Assistant Secretary. (2) Each recipient shall make the initial notification required by paragraph (a)(1) of this section within 90 days of the effective date of this part or of the date this part first applies to such recipient, whichever comes later, which notification shall include publication in: (i) Local newspapers; (ii) Newspapers and magazines operated by such recipient or by student, alumnae, or alumni groups for or in connection with such recipient; and (iii) Memoranda or other written communications distributed to every student and employee of such recipient. (b) Publications. (1) Each recipient shall prominently include a statement of the policy described in paragraph (a) of this section in each announcement, bulletin, catalog, or application form which it makes available to any person of a type, described in paragraph (a) of this section, or which is otherwise used in connection with the recruitment of students or employees. (2) A recipient shall not use or distribute a publication of the type described in this paragraph which suggests, by text or illustration, that such recipient treats applicants, students, or employees differently on the basis of sex except as such treatment is permitted by this part. (c) Distribution. Each recipient shall distribute without discrimination on the basis of sex each publication described in paragraph (b) of this section, and shall apprise each of its admission and employment recruitment representatives of the policy of nondiscrimination described in paragraph (a) of this section, and require such representatives to adhere to such policy.

Required Action:

In accordance with the Title IX and Section 504 regulations, 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, community members, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at

<http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name or title, address, and telephone number.

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use the coordinator's name for the contact information for printed materials, but it is not necessary. Identification of the coordinator's title is sufficient for printed materials. For the college's website, the name of the coordinator(s) must be included.

Non-Compliance:

The college has designated coordinators for Title IX and disability services as required, but the complete required information on these coordinators is not included on the majority of the non-discrimination notices reviewed. In addition, in many promotional and marketing materials, the contact provided for disability matters is not the designated coordinator and the reader is referred to various staff across campus for inquiries.

Criteria:

28 CFR §107(a) - Designation of responsible employee.- A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph.

34 CFR §104.7(a) – Designation of responsible employee. A recipient that employs fifteen or more persons shall designate at least one person to coordinate its efforts to comply with this part.

34 CFR §106.8(a) – Designation of responsible employee. Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions which would be prohibited by this part. The recipient shall notify all its students and employees of the name, office address and telephone number of the employee or employees appointed pursuant to this paragraph.

34 CFR §100 Appendix B IV.O (Guidelines) - Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will

take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

In accordance with the Title IX and Section 504 regulations, 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, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

If the college requires or prefers someone to initially intake and screen calls and then refer them to coordinators, it is recommended that this role be limited to individuals with the required civil rights training to ensure inquiries are correctly processed and managed.

Recommendations:

The college currently only has one individual performing Title IX investigations. Interviews and review of records indicated the college has been able to address and resolve all Title IX issues to date, but staff indicated that this process has at times strained resources. In addition, college records show the number of complaints and grievances have steadily increased over the last few years. Due to the high priority given to Title IX issues and the growing number of cases, staff and investigators assigned to work on Title IX matters can become strained and working on these matters can create a backlog for their regular duties. In addition, circumstances may arise in which the current Title IX coordinator has a conflict of interest. It is recommended management explore options for increasing available resources for Title IX investigations or consider training additional staff for this role as back-up.

A.iii Annual Public Notification

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and disabled individuals. A brief summary of program offerings and admission criteria should be included in the annual announcement, as well as the name, address and telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Non-Compliance:

Big Bend Community College has its annual non-discrimination statement published on its website under “non-discrimination policy”. The published statement includes all required elements, but is not available in alternate languages for the communities of limited English proficiency in the area.

Criteria:

34 CFR §100.6(d) - Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §100 Appendix B IV.O (Guidelines) - Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term, which includes all required components noted above. The notification should include a brief summary of the college's program offerings, admission criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that will reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area.

In addition, since the college has acknowledged that its service area includes one or more “communities of national origin minority persons with limited English language skills”, it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them.

A.iv Grievance Procedure

A recipient shall adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

The investigation did not reveal any evidence of a violation.

Recommendation: Although the college has a grievance policy, the document was not on the college's website or published in any documents reviewed. The policy was only obtained by specifically requesting the document. In interviews with staff and students, no one interviewed, with the exception of HR staff, was familiar with the policy or knew how the document could be found. It is recommended the college consider making the grievance policy more accessible by including it on its website, in published material, or by providing copies to students and employees.

Section B - Site Location and Student Eligibility Criteria

Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability.

Issues that could result in discrimination or segregation include the selection of certain sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, national origin, sex, or disability.

B.i Student Eligibility

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminates on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocation education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

The investigation did not reveal any evidence of a violation.

Per Washington State law, the college has an open enrollment policy and is open to all qualifying individuals.

B.ii Site Selection and Modifications

Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both

minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

The investigation did not reveal any evidence of a violation.

B.iii Residency

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.

The investigation did not reveal any evidence of a violation.

The college does not have attendance zones and does not exclude students based on geographic boundaries.

Section C - Recruitment

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should include individuals from different races, national origins, sex, and disabilities.

C.i Recruitment Activities

Recipients must conduct their recruitment activities so as to not exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review found no indication of bias or evidence that opportunities were being limited to individuals from any group.

Recommendation:

In recent years, the college has been unable to meet several Perkins Performance indicators tied to Non-traditional and minority populations. Although the college's service area is over 30% Hispanic and all recruitment activity would probably reach some portion of the Latino population, the college should consider adopting recruitment activities that are directly targeted to minority and Hispanic population to better reach these community members. These efforts could include events at migrant centers, churches, and/or Hispanic events and distribution of more material in Spanish.

C.ii Recruitment Materials

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disabilities.

The investigation did not reveal any evidence of a violation.

Our review found no evidence that any material's descriptions of opportunities had the purpose or effect of excluding a protected group.

C.iii Recruitment Teams

To the extent possible, recruiting teams should represent persons of different races, colors, national origins, sexes, and disabilities.

The investigation did not reveal any evidence of a violation.

The college's demographics relating to the recruitment team showed a diverse group working in this area. The team includes individuals from various ethnicities, members that speak Spanish fluently and both males and females.

C.iv Counseling Limited English Proficiency (LEP)/Sensory Impairments

Recipients must ensure that counselors can effectively communicate with individuals with limited English proficiency and sensory impairments.

Non-Compliance:

The college's counseling and advising staff include individuals fluent in Spanish who are able to serve the Spanish speaking communities in the area. However interviews with staff indicated that the college has seen a large increase in students with hearing impairments. Currently the college does not have a process or plan to ensure counselors and other student services staff can effectively communicate with individuals from this population.

Criteria:

34 CFR §100.3 - (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv)

Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B IV.L (Guidelines) -Recipients may not restrict an applicant's admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction. Acceptable methods of identification include: (1) Identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary. Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.

34 CFR §100 Appendix B IV.O (Guidelines) - Recipients must insure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

Required Action:

The college should take steps to ensure individuals involved in recruitment, counseling, and student services have the necessary tools and resources to communicate effectively with individuals with various disabilities to include hearing impairments.

Recommendation:

During interviews, several staff members noted that the use of employees as translators can create a strain for both translators and college services. The college serves a large Spanish speaking population and many of the bi-lingual employees are tasked to provide translation services for this population, which can take them away from their regular duties and put a strain on their divisions. It is recommended the college consider adding the task of translating to these employees job description and reduce their regular duties to accommodate for this addition duty or find other alternate tools to serve populations that have limited English proficiency. In addition, it is recommended the college train staff and

provide tool for dealing directly with community members on how to communicate with any individuals not proficient in English (not just Spanish).

C.v Promotional Efforts

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration.

Non-Compliance:

A review of pictures on promotional materials found several that could have the effect of perpetuating stereotypes. The pictures on the Automotive Technology, Aviation Maintenance Technology, Industrial system Technology, and Simulation Technology programs all only included males, with two of the brochures showing only Caucasian males. The pictures on the rack cards for Business Information Management, Early Childhood Education, Medical Assistant, and the Nursing programs depicted only females. Some of the videos on-line for various programs could also be perceived as perpetuating stereotypes. The video for the CDL program only shows males. In addition, none of the material reviewed contained a depiction of an individual that appeared to be Asian/Pacific Islander and very few images contained African-Americans or individuals with disabilities.

Criteria:

34 CFR §100 Appendix B (Guidelines V.A) - Recipients must insure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or handicap.

34 CFR §100 Appendix B (Guidelines V.C) Recipients must conduct their student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap. Where recruitment activities involve the presentation or portrayal of vocational and career opportunities, the curricula and programs described should cover a broad range of occupational opportunities and not be limited on the basis of the race, color, national origin, sex, or handicap of the students or potential students to whom the presentation is made. Also, to the extent possible, recruiting teams should include persons of different races, national origins, sexes, and handicaps.

34 CFR §100 Appendix B (Guidelines V.E) – Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents’ night, shop demonstrations, visitation by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups

traditionally have not been represented. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

34 CFR §104.42 (a) and (b) - (a) General. Qualified handicapped persons may not, on the basis of handicap, be denied admission or be subjected to discrimination in admission or recruitment by a recipient to which this subpart applies.(b) Admissions. In administering its admission policies, a recipient to which this subpart applies: (1) May not apply limitations upon the number or proportion of handicapped persons who may be admitted; (2) May not make use of any test or criterion for admission that has a disproportionate, adverse effect on handicapped persons or any class of handicapped persons unless (i) the test or criterion, as used by the recipient, has been validated as a predictor of success in the education program or activity in question and (ii) alternate tests or criteria that have a less disproportionate, adverse effect are not shown by the Assistant Secretary to be available. (3) Shall assure itself that (i) admissions tests are selected and administered so as best to ensure that, when a test is administered to an applicant who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's aptitude or achievement level or whatever other factor the test purports to measure, rather than reflecting the applicant's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure); (ii) admissions tests that are designed for persons with impaired sensory, manual, or speaking skills are offered as often and in as timely a manner as are other admissions tests; and (iii) admissions tests are administered in facilities that, on the whole, are accessible to handicapped persons; and (4) Except as provided in paragraph (c) of this section, may not make preadmission inquiry as to whether an applicant for admission is a handicapped person but, after admission, may make inquiries on a confidential basis as to handicaps that may require accommodation.

Required Action:

The college should review pictures and illustrations contained in promotional and advertising material and ensure they portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities. The college should take measures to ensure material being used do not contain pictures that perpetuate stereotypes.

C.vi Service Area LEP

If a recipient's service area contains a community with persons of limited English proficiency, information must be available to that community in its language.

Non-Compliance:

Although the college serves a large Spanish speaking population, none of the advertising and promotional materials reviewed were available in Spanish.

Criteria:

34 CFR §100.3 - (a) *General.* No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) *Specific discriminatory actions prohibited.* (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B-V.E (Guidelines) – Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents' night, shop demonstrations, visitation by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups traditionally have not been represented. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

34 CFR §100 Appendix B IV.L (Guidelines) -Recipients may not restrict an applicant's admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction.

Acceptable methods of identification include: (1) Identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary. Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.

Required Action:

The college should begin the process of translating materials to Spanish for community members that are not native English speakers. In addition, the college should periodically assess the community it serves to determine if materials should be offered in any other languages.

Section D - Admissions

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admission criteria excludes a disproportionate number of persons of a particular race, color, national origin, sex, or disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

D.i Discriminatory Criteria

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.

The investigation did not reveal any evidence of a violation.

Our review of admission policies for various programs, both technical and academic, and interviews with admission staff did not find any indication the college has discriminatory admission criteria.

D.ii Preadmission Inquiries

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

Non-Compliance

The college's Application for Admission requires prospective students to state if they are a "single parent". Federal law prohibits questions pertaining to an individual's familial status and disabilities on admission forms.

Criteria:

34 CFR §106.21(c) (4) – A recipient shall not make pre-admission inquiry as to the marital status of an applicant for admission, including whether such applicant is “Miss” or “Mrs.”

34 CFR 104.42(b) (4) - Shall not make pre-admission inquiry as to the marital status of an applicant for admission, including whether such applicant is “Miss” or “Mrs.” A recipient may make pre-admission inquiry as to the sex of an applicant for admission, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part..

Required Action:

The college should remove any questions relating to a student’s marital, parental and/or disability status from admission forms and applications.

Recommendation:

Review of the college’s admission’s form found that it contained questions pertaining to applicant’s race and ethnicity. Although inquiring about a candidates color, national origin and ethnicity is not prohibited, best practices recommends these question include language notifying prospective students that providing this information is optional and will not be used to select individuals for admission.

D.iii Disabled & Employment Limitations

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

The investigation did not reveal any evidence of a violation.

A review of materials and interviews with staff and students found no indication that the college denies or limits students with disabilities from participating in any programs or courses.

D.iv LEP & Benefit Limitation

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

The investigation did not reveal any evidence of a violation.

The college's service area contains a large Hispanic/Latino community and the college continues to take steps to promote all opportunities to all community members including those whose primary language is Spanish. Our review of demographics, interviews with staff and students, and review of program descriptions found no indication that admission to any vocational program is restricted due to limited English language skills.

D.v Preadmission Tests

Postsecondary admission's tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

The investigation did not reveal any evidence of a violation.

A review of documentation provided, interviews with campus community members, and review of the college's website found that all preadmission tests were standard industry tests used for placement. The review found no evidence that tests are selected or administered in a way that could be discriminatory.

D.vi Disability Inquiries

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

The investigation did not reveal any evidence of a violation.

Review of admission forms, interviews with staff, students, and faculty, as well as the college's Director of Access Services, found no evidence the college is making preadmission inquiries regarding disabilities.

Section E - Student Financial Assistance

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequest, or similar legal instrument or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, national origin, or disability.

E.i Financial Assistance Availability

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

The investigation did not reveal any evidence of a violation.

Interviews with staff and students, and review of documentation and demographic information found no indication that financial assistance isn't distributed equitably to all students

E.ii Sex-Restricted Awards

Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument.

The investigation did not reveal any evidence of a violation.

A review of scholarships available to the college's students found three in which preference is given to females, however all these awards are administered by the College's foundation and not the college and do not appear to have the effect of overall discrimination on the basis of sex.

E.iii Equitable Financial Aid Information

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

Non-Compliance:

The review of financial aid information and materials distributed by the college and on the college's website appeared to be equitably written without any indication of bias. However review of these documents found none included a non-discrimination notice.

Criteria:

34 CFR §100.3(a-b) – (a) *General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited: (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv)*

Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B (Guidelines VI-B) — Student Financial Assistance- Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

34 CFR §104(a) and (b) - (a) General. No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified

handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service.

34 CFR §104.46 - (a) Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.

34 CFR §106.37 - (a) General. Except as provided in paragraphs (b) and (c) of this section, in providing financial assistance to any of its students, a recipient shall not: (1) On the basis of sex, provide different amount or types of such assistance, limit eligibility for such assistance which is of any particular type or source, apply different criteria, or otherwise discriminate; (2) Through solicitation, listing, approval, provision of facilities or other services, assist any foundation, trust, agency, organization, or person which provides assistance to any of such recipient's students in a manner which discriminates on the basis of sex; or (3) Apply any rule or assist in application of any rule concerning eligibility for such assistance which treats persons of one sex differently from persons of the other sex with regard to marital or parental status. (b) Financial aid established by certain legal instruments. (1) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign wills, trusts, bequests, or similar legal instruments or by acts of a foreign government which requires that awards be made to members of a particular sex specified therein; Provided, That the overall effect of the award of such sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex. (2) To ensure nondiscriminatory awards of assistance as required in paragraph (b)(1) of this section, recipients shall develop and use procedures under which: (i) Students are selected for award of financial assistance on the basis of nondiscriminatory criteria and not on the basis of availability of funds restricted to members of a particular sex; (ii) An appropriate sex-restricted scholarship, fellowship, or other form of financial assistance is allocated to each student selected under paragraph (b)(2)(i) of this section; and (iii) No student is denied the award for which he or she was selected

under paragraph (b)(2)(i) of this section because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex. (c) Athletic scholarships. (1) To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics. (2) Separate athletic scholarships or grants-in-aid for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with this paragraph and §106.41.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials, to include all financial aid forms, made available to participants, students, applicants, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at:

<http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. This statement should be included on all financial aid written materials.

E.iv LEP Financial Aid Information

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

Non-Compliance

The college has a significant population of community member who are native Spanish speakers. The review found the college does not have any financial aid forms and information available in Spanish for this population.

Criteria:

34 CFR 100.3(a-b) – (a) **General.** *No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited: (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different,*

or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §104(a) and (b) - (a) General. No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service.

34 CFR 100 Appendix B (Guidelines VI-B) – Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of

opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

34 CFR §104.46 - (a) Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.

34 CFR §106.37 - (a) General. Except as provided in paragraphs (b) and (c) of this section, in providing financial assistance to any of its students, a recipient shall not: (1) On the basis of sex, provide different amount or types of such assistance, limit eligibility for such assistance which is of any particular type or source, apply different criteria, or otherwise discriminate; (2) Through solicitation, listing, approval, provision of facilities or other services, assist any foundation, trust, agency, organization, or person which provides assistance to any of such recipient's students in a manner which discriminates on the basis of sex; or (3) Apply any rule or assist in application of any rule concerning eligibility for such assistance which treats persons of one sex differently from persons of the other sex with regard to marital or parental status. (b) Financial aid established by certain legal instruments. (1) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign wills, trusts, bequests, or similar legal instruments or by acts of a foreign government which requires that awards be made to members of a particular sex specified therein; Provided, That the overall effect of the award of such sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex. (2) To ensure nondiscriminatory awards of assistance as required in paragraph (b)(1) of this section, recipients shall develop and use procedures under which: (i) Students are selected for award of financial assistance on the basis of nondiscriminatory criteria and not on the basis of availability of funds restricted to members of a particular sex; (ii) An appropriate sex-restricted scholarship, fellowship, or other form of financial

assistance is allocated to each student selected under paragraph (b)(2)(i) of this section; and (iii) No student is denied the award for which he or she was selected under paragraph (b)(2)(i) of this section because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex. (c) Athletic scholarships. (1) To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics. (2) Separate athletic scholarships or grants-in-aid for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with this paragraph and §106.41.

Required Action:

The college should take steps to translate financial aid forms and information to Spanish, starting with the most basic and commonly used forms. In addition, the college must take steps to ensure financial aid information is available to all community members who are not native English speakers.

Recommendation:

Interviewees involved in aviation stated that some of the aviation courses have unique financial aid challenges and substantial additional fees. These additional barriers will often sideline students and prevent them from completing programs. Interviewees stated that due to weather issues and FAA requirements, students enrolled in these programs often took longer than traditional students to graduate and were often side lined due to financial difficulties. Interviewees suggested the college consider providing students in these programs a specialized briefing on financial resources, planning, and available programs when they enroll to minimize these problems and to assist students in completing their educational goals.

Section F – Counseling and Pre-Vocational Programs

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

F.i Counseling Materials & Activities

Recipients must ensure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

A review of the college's promotional and recruiting materials, review of policies and procedures, and interviews with staff and students found no indication of discrimination in counseling materials and activities.

F.ii Directing or Profiling

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

A review of program requirements for various programs, statistical information, and interviews with staff and students, found no indication that students were being profiled or directed/steered to certain courses or programs.

F.iii Directing Toward Restrictive Career

Recipients may not counsel disabled students toward more restrictive career objectives than nondisabled students with similar abilities and interests.

The investigation did not reveal any evidence of a violation.

A review of various program requirements, interviews with staff and students, and review of enrollment statistics found no indication that disabled students were being directed towards more restrictive careers.

F.iv Disproportionate Enrollment

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

Non-Compliance

The college has been unable to meet Perkins performance indicators for Non-Traditional Enrollments and Non-traditional Performance for the last three academic years. In addition, a review of demographics for CTE programs found a very low percent of non-traditional and minority students in some programs.

Criteria:

34 CFR 106.36 (c) - *Where a recipient finds that a particular class contains a substantially disproportionate number of individuals of one sex, the recipient shall*

take such action as is necessary to assure itself that such disproportion is not the result of discrimination on the basis of sex in counseling or appraisal materials or by counselors.

34 CFR 100 Appendix B (Guidelines VI-B) – *Recipients that operate vocational education programs must insure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student’s prospects for success in any career or program based upon the student’s race, color, national origin, sex, or handicap. Recipients may not counsel handicapped students toward more restrictive career objectives than non-handicapped students with similar abilities and interests. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or handicapped students, recipients must take steps to insure that the disproportion does not result from unlawful discrimination in counseling activities.*

Required Action:

The college should perform an evaluation of its counseling, and recruitment efforts to ensure none of its practices are resulting in disproportionate enrollment.

Recommendation:

In interviews with students some suggested use of non-traditional role models to promote non-traditional students to enroll in CTE programs. One of the interviewees enrolled in an aviation course commented that seeing women instructors and being able to hear from and ask questions from females successful in the industry would be a valuable tool in overcoming stereotypes.

Section G - Services for Students with Disabilities (SWD)

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

G.i SWD Access to Programs

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

The investigation did not reveal any evidence of a violation.

Interview with the campus community, to include the college's Accessibility Coordinator, and students found no indication that any qualified person has been denied access or subjected to discrimination.

Recommendation:

In interviews with staff and students with disabilities, interviewees stated that students would benefit from more counseling and support services, especially students with disabilities. Several staff members stated that in their experience and from their interactions with students, they have observed that many students (to include those with disabilities) would benefit from one-on-one counseling and support. Interviewees stated these services would enhance a positive student experience on campus and would increase opportunity for success.

G.ii Equipment Barriers

Disabled students must not be excluded from vocational, career, or academic programs, courses, services or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

The investigation did not reveal any evidence of a violation.

A review of equipment, tools and resources found the college maintains a large supply of resources and tools to assist disabled students. Interviews with staff and students and review of various materials found no indication that disabled students were excluded or discouraged from participation in activities or services due to equipment barriers or lack of services.

G.iii Postsecondary 504 Services

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete the degree program and/or licensure requirements.

The investigation did not reveal any evidence of a violation.

The review found no indication of discrimination in academic programs and adjustments and found the college is taking appropriate measures to ensure participants have required modifications and adjustment to complete programs.

G.iv Academic Adjustment

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

The investigation did not reveal any evidence of a violation.

The review found that the college is making necessary adjustments to meet the needs of students with disabilities.

Recommendation:

Several disabled individuals interviewed stated they have had difficulty receiving tutoring and one-on-one assistance at the college's help centers. The students stated that they had been ignored and brushed off by the student staff working in these areas. The interviewees stated they had experienced difficulties in some of their classes, but were not able to get assistance and help they needed. These individuals believed that they needed some one-on-one tutoring/instruction time and that it had not been available to them.

G.v Evaluation Accommodations & Modifications

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes or achievement levels or other relevant factors are measured and not the disability.

The investigation did not reveal any evidence of a violation.

A review of academic programs and requirements, as well as interviews with staff and students, found no indication that course examinations or evaluations are administered in a manner designed or with the effect of discriminating against those with disabilities.

G.vi Equitable Housing Opportunities

Students receive equitable opportunities to benefit from housing programs regardless of their sex, national origin, color, race, or disability.

The investigation did not reveal any evidence of a violation.

Interviews with staff and students and review of documentation found that the college's residence hall provides equitable housing opportunities to individuals with disabilities.

G.vii Comparable & Accessible Housing

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

The investigation did not reveal any evidence of a violation.

A review of the college’s housing policies and interviews with staff and students found that the college’s residence hall provides equitable and accessible housing opportunities to individuals with disabilities at the same cost as individuals without a disability.

G.viii Off-Campus Housing

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their sex, race, color, national origin or disability.

Not Applicable

The College does not provide off-campus housing services to students.

G.ix Landlords

The college does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

Not Applicable

The college does not work with or refer students to any landlords.

Section H – Accessibility

Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) – must ensure each program is fully accessible.
- Between 6/4/1977 – 1/17/1991 – New construction - must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: New construction – must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: New construction and alterations – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).
- Between 9/15/2010 and 3/15/2012 – may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: New construction – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

Section H is provided at the end of this document as Attachment A

Section J – Comparable Facilities

Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male and female students should be located in similar proximity to the associated classrooms, shops or laboratories.

Section J is provided at the end of this document as Attachment A

Section K – Work Study Cooperative Education, Job Placement, and Apprentice Training

An educational institution not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of a student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. The institution should periodically review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

K.i Work Study & Job Placement

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

Non-Compliance:

Currently the college does not offer direct job placement or apprenticeship, but does have work study, externships, and intern opportunities. The college's work study and student employment is managed by the college's financial aid department. The college's financial aid department mostly manages all administrative aspects of hiring, and each individual department screens, selects, and supervises its student employees individually, without input or oversight by the college's HR division. This practice, as well as the rate of turn-over across campus, puts the college and student employees at risk since all employees may not be familiar with recommended and required employment and personnel laws. In addition, without centralized oversight, the college does not have any process to monitor student hiring and placement in these opportunities to ensure no pattern of discrimination is present.

Criteria:

34 CFR 100.3(a-b) – (a) **General.** No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) **Specific discriminatory actions prohibited:** (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR 104.4 (a) & (b) - (a) **General.** No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) **Discriminatory actions prohibited.** (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service. (2) For purposes of this part, aids, benefits, and services, to be equally effective, are not required to produce the identical result or

level of achievement for handicapped and nonhandicapped persons, but must afford handicapped persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs. (3) Despite the existence of separate or different aid, benefits, or services provided in accordance with this part, a recipient may not deny a qualified handicapped person the opportunity to participate in such aid, benefits, or services that are not separate or different. (4) A recipient may not, directly or through contractual or other arrangements, utilize criteria or methods of administration (i) that have the effect of subjecting qualified handicapped persons to discrimination on the basis of handicap, (ii) that have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the recipient's program or activity with respect to handicapped persons, or (iii) that perpetuate the discrimination of another recipient if both recipients are subject to common administrative control or are agencies of the same State. (5) In determining the site or location of a facility, an applicant for assistance or a recipient may not make selections (i) that have the effect of excluding handicapped persons from, denying them the benefits of, or otherwise subjecting them to discrimination under any program or activity that receives Federal financial assistance or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the program or activity with respect to handicapped persons. (6) As used in this section, the aid, benefit, or service provided under a program or activity receiving Federal financial assistance includes any aid, benefit, or service provided in or through a facility that has been constructed, expanded, altered, leased or rented, or otherwise acquired, in whole or in part, with Federal financial assistance.

34 CFR §104.46 - (a) Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap. (2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.

34 CFR 106.31 – (a) *General.* Except as provided elsewhere in this part, no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient which receives Federal financial assistance. This subpart does not apply to actions of a recipient in connection with admission of its students to an education program or activity of (1) a recipient to which subpart C does not apply, or (2) an entity, not a recipient, to which subpart C would not apply if the entity were a recipient. (b) *Specific prohibitions.* Except as provided in this subpart, in providing any aid, benefit, or service to a student, a recipient shall not, on the basis of sex: (1) Treat one person differently from another in determining whether such person satisfies any requirement or condition for the provision of such aid, benefit, or service; (2) Provide different aid, benefits, or services or provide aid, benefits, or services in a different manner; (3) Deny any person any such aid, benefit, or service; (4) Subject any person to separate or different rules of behavior, sanctions, or other treatment; (5) Apply any rule concerning the domicile or residence of a student or applicant, including eligibility for in-state fees and tuition; (6) Aid or perpetuate discrimination against any person by providing significant assistance to any agency, organization, or person which discriminates on the basis of sex in providing any aid, benefit or service to students or employees; (7) Otherwise limit any person in the enjoyment of any right, privilege, advantage, or opportunity. (c) *Assistance administered by a recipient educational institution to study at a foreign institution.* A recipient educational institution may administer or assist in the administration of scholarships, fellowships, or other awards established by foreign or domestic wills, trusts, or similar legal instruments, or by acts of foreign governments and restricted to members of one sex, which are designed to provide opportunities to study abroad, and which are awarded to students who are already matriculating at or who are graduates of the recipient institution; Provided, a recipient educational institution which administers or assists in the administration of such scholarships, fellowships, or other awards which are restricted to members of one sex provides, or otherwise makes available reasonable opportunities for similar studies for members of the other sex. Such opportunities may be derived from either domestic or foreign sources. (d) *Aid, benefits or services not provided by recipient.* (1) This paragraph applies to any recipient which requires participation by any applicant, student, or employee in any education program or activity not operated wholly by such recipient, or which facilitates, permits, or considers such participation as part of or equivalent to an education program or activity operated by such recipient, including participation in educational consortia and cooperative employment and student-teaching assignments. (2) Such recipient: (i) Shall develop and implement a procedure designed to assure itself that the operator or sponsor of such other education program or activity takes no action affecting any applicant, student, or employee of such recipient which this part would prohibit such recipient from taking; and (ii) Shall not facilitate, require, permit, or consider such participation if such action occurs.

34 CFR §106.38 -(a) Assistance by recipient in making available outside employment. A recipient which assists any agency, organization or person in making employment available to any of its students: (1) Shall assure itself that such employment is made available without discrimination on the basis of sex; and (2) Shall not render such services to any agency, organization, or person which discriminates on the basis of sex in its employment practices. (b) Employment of students by recipients. A recipient which employs any of its students shall not do so in a manner which violates subpart E of this part.

34 CFR 100 Appendix B (Guidelines VII-A-B) – A recipient must insure that: (a) It does not discriminate against its students on the basis of race, color, national origin, sex, or handicap in making available opportunities in cooperative education, work study and job placement programs; and (b) students participating in cooperative education, work study and job placement programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex, or handicap in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay. If a recipient enters into a written agreement for the referral or assignment of students to an employer, the agreement must contain an assurance from the employer that students will be accepted and assigned to jobs and otherwise treated without regard to race, color, national origin, sex, or handicap. Recipients may not honor any employer's request for students who are free of handicaps or for students of a particular race, color, national origin, or sex. In the event an employer or prospective employer is or has been subject to court action involving discrimination in employment, school officials should rely on the court's findings if the decision resolves the issue of whether the employer has engaged in unlawful discrimination.

34 CFR 100 Appendix B (Guidelines VIII-A-F) A. EMPLOYMENT GENERALLY - Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or handicap. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion or other discrimination against students. B. RECRUITMENT - Recipients may not limit their recruitment for employees to schools, communities, or companies disproportionately composed of persons of a particular race, color, national origin, sex, or handicap except for the purpose of overcoming the effects of past discrimination. Every source of faculty must be notified that the recipient does not discriminate in employment on the basis of race, color, national origin, sex, or handicap. C. PATTERNS OF DISCRIMINATION - Whenever the Office for Civil Rights finds that in light of the representation of protected groups in the relevant labor market there is a significant underrepresentation or overrepresentation of protected group persons on the staff of a vocational education school or program, it will presume that the disproportion results from unlawful discrimination. This presumption can be overcome by proof that qualified persons of the particular race, color, national origin, or sex, or that qualified handicapped persons are not in fact available in the relevant labor market. D. SALARY POLICIES - Recipients must establish and maintain faculty salary scales and policy based upon the conditions and responsibilities of employment, without regard to race, color, national origin, sex or handicap. E. EMPLOYMENT OPPORTUNITIES FOR HANDICAPPED APPLICANTS

Recipients must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question. Recipients must make reasonable accommodation for the physical or mental limitations of handicapped applicants who are otherwise qualified unless recipients can demonstrate that the accommodation would impose an undue hardship. F. THE EFFECTS OF PAST DISCRIMINATION - Recipients must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, or sex, or who are handicapped.

Required Action:

The college should take steps to ensure all individuals involved in selection, screening and supervision of student employees and interns are aware of applicable employment requirements and human resource laws to ensure opportunities are available to all qualified candidates. In addition, the college should take steps to monitor hiring practices and selections of student employees ensure no patterns of discrimination exist or that any individual practices can be construed as discriminatory.

K.ii Employer Agreements

A recipient that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, or pay.

The investigation did not reveal any evidence of a violation.

A review of sample agreements between the college and outside employers that provide the college's students with internship and work experience found they contain the requirement for non-discrimination by the employer.

Section L - Apprentice Training Program

Colleges have the responsibility to take steps to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. Although not required, the college should consider having a written agreement whereby the apprenticeship program indicates it will not discriminate on these bases. The college should periodically review apprenticeship assurance forms or agreements, and the assignment of students presently in such programs to see whether any such patterns exist.

L.i Apprenticeship Agreements

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates

against its members or applicants on the basis of race, color, national origin, sex, or disability. A written agreement between the institution and the labor union or other sponsor should include an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

Not Applicable

The college does not offer any apprenticeship opportunities at this time.

Section M - Employment

Colleges are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

M.i Employment Practices

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

The review found no evidence of non-compliance in the general employment practices of the college for faculty and staff. The college has strong policies and procedures designed to ensure that there is no discrimination or appearance of discrimination in general employment. However, the college does not follow these guidelines and practices for students. Student Employment at the college is managed by individual departments without any oversight or guidance from HR. Those supervising student and working with student employees do not receive any training or information on best practices, supervision, and/or civil rights laws. The screening process, questions asked of applicants, and the materials used during the process of selecting student employees are created and used by each individual supervisor and are not reviewed or screened by the college's human resource department, which put both the college and student employees at risk of possible actual or perceived discrimination.

Criteria:

34 CFR §100.3(c) – Where a primary objective of the Federal financial assistance to a program to which this regulation applies is to provide employment, a recipient may not (directly or through contractual or other arrangements) subject an individual to discrimination on the ground of race, color, or national origin in its employment practices under such program (including recruitment or recruitment advertising, employment, layoff or termination, upgrading, demotion, or transfer, rates of pay or other forms of compensation, and use of facilities), including programs where a primary objective of the Federal financial assistance is (i) to reduce the employment of

such individuals or to help them through employment to meet subsistence needs, (ii) to assist such individuals through employment to meet expenses incident to the commencement or continuation of their education or training, (iii) to provide work experience which contributes to the education or training of such individuals, or (iv) to provide remunerative activity to such individuals who because of handicaps cannot be readily absorbed in the competitive labor market.

34 CFR §104.11 - Discrimination prohibited. - (a) General. (1) No qualified handicapped person shall, on the basis of handicap, be subjected to discrimination in employment under any program or activity to which this part applies. (2) A recipient that receives assistance under the Education of the Handicapped Act shall take positive steps to employ and advance in employment qualified handicapped persons in programs or activities assisted under that Act. (3) A recipient shall make all decisions concerning employment under any program or activity to which this part applies in a manner which ensures that discrimination on the basis of handicap does not occur and may not limit, segregate, or classify applicants or employees in any way that adversely affects their opportunities or status because of handicap. (4) A recipient may not participate in a contractual or other relationship that has the effect of subjecting qualified handicapped applicants or employees to discrimination prohibited by this subpart. The relationships referred to in this paragraph include relationships with employment and referral agencies, with labor unions, with organizations providing or administering fringe benefits to employees of the recipient, and with organizations providing training and apprenticeships. (b) Specific activities. The provisions of this subpart apply to: (1) Recruitment, advertising, and the processing of applications for employment; (2) Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff and rehiring; (3) Rates of pay or any other form of compensation and changes in compensation; (4) Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists; (5) Leaves of absence, sick leave, or any other leave; (6) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (7) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, and selection for leaves of absence to pursue training; (8) Employer sponsored activities, including those that are social or recreational; and (9) Any other term, condition, or privilege of employment. (c) A recipient's obligation to comply with this subpart is not affected by any inconsistent term of any collective bargaining agreement to which it is a party.

34 CFR §104.12 - Reasonable accommodation. (a) A recipient shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified handicapped applicant or employee unless the recipient can demonstrate that the accommodation would impose an undue hardship on the operation of its program or activity. (b) Reasonable accommodation may include: (1) Making facilities used by employees readily accessible to and usable by handicapped persons, and (2) Job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, the provision of readers or interpreters, and other similar actions. (c) In determining pursuant to paragraph (a) of this section whether an accommodation would impose an undue hardship on the operation of a recipient's program or activity, factors to be considered include: (1) The overall size

of the recipient's program or activity with respect to number of employees, number and type of facilities, and size of budget; (2) The type of the recipient's operation, including the composition and structure of the recipient's workforce; and (3) The nature and cost of the accommodation needed. (d) A recipient may not deny any employment opportunity to a qualified handicapped employee or applicant if the basis for the denial is the need to make reasonable accommodation to the physical or mental limitations of the employee or applicant.

34 CFR §104.13 - Employment criteria. - (a) A recipient may not make use of any employment test or other selection criterion that screens out or tends to screen out handicapped persons or any class of handicapped persons unless: (1) The test score or other selection criterion, as used by the recipient, is shown to be job-related for the position in question, and (2) Alternative job-related tests or criteria that do not screen out or tend to screen out as many handicapped persons are not shown by the Director to be available. (b) A recipient shall select and administer tests concerning employment so as best to ensure that, when administered to an applicant or employee who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's or employee's job skills, aptitude, or whatever other factor the test purports to measure, rather than reflecting the applicant's or employee's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure).

34 CFR §104.14 – Preemployment inquiries. (a) Except as provided in paragraphs (b) and (c) of this section, a recipient may not conduct a preemployment medical examination or may not make preemployment inquiry of an applicant as to whether the applicant is a handicapped person or as to the nature or severity of a handicap. A recipient may, however, make preemployment inquiry into an applicant's ability to perform job-related functions. (b) When a recipient is taking remedial action to correct the effects of past discrimination pursuant to 104.6 (a), when a recipient is taking voluntary action to overcome the effects of conditions that resulted in limited participation in its federally assisted program or activity pursuant to 104.6(b), or when a recipient is taking affirmative action pursuant to section 503 of the Act, the recipient may invite applicants for employment to indicate whether and to what extent they are handicapped, Provided, That: (1) The recipient states clearly on any written questionnaire used for this purpose or makes clear orally if no written questionnaire is used that the information requested is intended for use solely in connection with its remedial action obligations or its voluntary or affirmative action efforts; and (2) The recipient states clearly that the information is being requested on a voluntary basis, that it will be kept confidential as provided in paragraph (d) of this section, that refusal to provide it will not subject the applicant or employee to any adverse treatment, and that it will be used only in accordance with this part. (c) Nothing in this section shall prohibit a recipient from conditioning an offer of employment on the results of a medical examination conducted prior to the employee's entrance on duty, Provided, That: (1) All entering employees are subjected to such an examination regardless of handicap, and (2) The results of such an examination are used only in accordance with the requirements of this part. (d) Information obtained in accordance with this section as to the medical condition or history of the applicant shall be collected and maintained on separate forms that shall be accorded confidentiality as medical records, except that: (1) Supervisors

and managers may be informed regarding restrictions on the work or duties of handicapped persons and regarding necessary accommodations; (2) First aid and safety personnel may be informed, where appropriate, if the condition might require emergency treatment; and (3) Government officials investigating compliance with the Act shall be provided relevant information upon request.

34 CFR §106.51 – (a) General. (1) No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in employment, or recruitment, consideration, or selection therefor, whether full-time or part-time, under any education program or activity operated by a recipient which receives Federal financial assistance. (2) A recipient shall make all employment decisions in any education program or activity operated by such recipient in a nondiscriminatory manner and shall not limit, segregate, or classify applicants or employees in any way which could adversely affect any applicant's or employee's employment opportunities or status because of sex. (3) A recipient shall not enter into any contractual or other relationship which directly or indirectly has the effect of subjecting employees or students to discrimination prohibited by this subpart, including relationships with employment and referral agencies, with labor unions, and with organizations providing or administering fringe benefits to employees of the recipient. (4) A recipient shall not grant preferences to applicants for employment on the basis of attendance at any educational institution or entity which admits as students only or predominantly members of one sex, if the giving of such preferences has the effect of discriminating on the basis of sex in violation of this part. (b) Application. The provisions of this subpart apply to: (1) Recruitment, advertising, and the process of application for employment; (2) Hiring, upgrading, promotion, consideration for and award of tenure, demotion, transfer, layoff, termination, application of nepotism policies, right of return from layoff, and rehiring; (3) Rates of pay or any other form of compensation, and changes in compensation; (4) Job assignments, classifications and structure, including position descriptions, lines of progression, and seniority lists; (5) The terms of any collective bargaining agreement; (6) Granting and return from leaves of absence, leave for pregnancy, childbirth, false pregnancy, termination of pregnancy, leave for persons of either sex to care for children or dependents, or any other leave; (7) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (8) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, selection for tuition assistance, selection for sabbaticals and leaves of absence to pursue training; (9) Employer-sponsored activities, including those that are social or recreational; and (10) Any other term, condition, or privilege of employment.

34 CFR §106.52 - Employment criteria. - A recipient shall not administer or operate any test or other criterion for any employment opportunity which has a disproportionately adverse effect on persons on the basis of sex unless: (a) Use of such test or other criterion is shown to predict validly successful performance in the position in question; and (b) Alternative tests or criteria for such purpose, which do not have such disproportionately adverse effect, are shown to be unavailable.

34 CFR §106.53 – Recruitment - (a) Nondiscriminatory recruitment and hiring. A recipient shall not discriminate on the basis of sex in the recruitment and hiring of

employees. Where a recipient has been found to be presently discriminating on the basis of sex in the recruitment or hiring of employees, or has been found to have in the past so discriminated, the recipient shall recruit members of the sex so discriminated against so as to overcome the effects of such past or present discrimination. (b) *Recruitment patterns.* A recipient shall not recruit primarily or exclusively at entities which furnish as applicants only or predominantly members of one sex if such actions have the effect of discriminating on the basis of sex in violation of this subpart.

34 CFR §106.54 – *Compensation* - A recipient shall not make or enforce any policy or practice which, on the basis of sex: (a) Makes distinctions in rates of pay or other compensation; (b) Results in the payment of wages to employees of one sex at a rate less than that paid to employees of the opposite sex for equal work on jobs the performance of which requires equal skill, effort, and responsibility, and which are performed under similar working conditions.

34 CFR §106.55 - *Job classification and structure* - A recipient shall not: (a) Classify a job as being for males or for females; (b) Maintain or establish separate lines of progression, seniority lists, career ladders, or tenure systems based on sex; or (c) Maintain or establish separate lines of progression, seniority systems, career ladders, or tenure systems for similar jobs, position descriptions, or job requirements which classify persons on the basis of sex, unless sex is a bona-fide occupational qualification for the positions in question as set forth in §106.61.

34 CFR §106.56 - *Fringe benefits* - (a) *Fringe benefits defined.* For purposes of this part, fringe benefits means: Any medical, hospital, accident, life insurance or retirement benefit, service, policy or plan, any profit-sharing or bonus plan, leave, and any other benefit or service of employment not subject to the provision of §106.54. (b) *Prohibitions.* A recipient shall not: (1) Discriminate on the basis of sex with regard to making fringe benefits available to employees or make fringe benefits available to spouses, families, or dependents of employees differently upon the basis of the employee's sex; (2) Administer, operate, offer, or participate in a fringe benefit plan which does not provide either for equal periodic benefits for members of each sex, or for equal contributions to the plan by such recipient for members of each sex; or (3) Administer, operate, offer, or participate in a pension or retirement plan which establishes different optional or compulsory retirement ages based on sex or which otherwise discriminates in benefits on the basis of sex.

34 CFR 106.57 – **Marital or parental status** - (a) *General.* A recipient shall not apply any policy or take any employment action: (1) Concerning the potential marital, parental, or family status of an employee or applicant for employment which treats persons differently on the basis of sex; or (2) Which is based upon whether an employee or applicant for employment is the head of household or principal wage earner in such employee's or applicant's family unit. (b) *Pregnancy.* A recipient shall not discriminate against or exclude from employment any employee or applicant for employment on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom. (c) *Pregnancy as a temporary disability.* A recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and

recovery therefrom and any temporary disability resulting therefrom as any other temporary disability for all job related purposes, including commencement, duration and extensions of leave, payment of disability income, accrual of seniority and any other benefit or service, and reinstatement, and under any fringe benefit offered to employees by virtue of employment. (d) Pregnancy leave. In the case of a recipient which does not maintain a leave policy for its employees, or in the case of an employee with insufficient leave or accrued employment time to qualify for leave under such a policy, a recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom as a justification for a leave of absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status which she held when the leave began or to a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

34 CFR 106.58 - Effect of State or local law or other requirements - (a) Prohibitory requirements. The obligation to comply with this subpart is not obviated or alleviated by the existence of any State or local law or other requirement which imposes prohibitions or limits upon employment of members of one sex which are not imposed upon members of the other sex. (b) Benefits. A recipient which provides any compensation, service, or benefit to members of one sex pursuant to a State or local law or other requirement shall provide the same compensation, service, or benefit to members of the other sex.

34 CFR 106.59 - Advertising. - A recipient shall not in any advertising related to employment indicate preference, limitation, specification, or discrimination based on sex unless sex is a bona-fide occupational qualification for the particular job in question.

34 CFR 106.60 — Pre-employment inquiries - (a) Marital status. A recipient shall not make pre-employment inquiry as to the marital status of an applicant for employment, including whether such applicant is “Miss or Mrs.” (b) Sex. A recipient may make pre-employment inquiry as to the sex of an applicant for employment, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part.

34 CFR 106.61 —Sex as a bona-fide occupational qualification. - A recipient may take action otherwise prohibited by this subpart provided it is shown that sex is a bona-fide occupational qualification for that action, such that consideration of sex with regard to such action is essential to successful operation of the employment function concerned. A recipient shall not take action pursuant to this section which is based upon alleged comparative employment characteristics or stereotyped characterizations of one or the other sex, or upon preference based on sex of the recipient, employees, students, or other persons, but nothing contained in this section shall prevent a recipient from considering an employee's sex in relation to employment in a locker room or toilet facility used only by members of one sex.

34 CFR 100 Appendix B (Guidelines VIII-(A)-(F) — A. EMPLOYMENT GENERALLY - Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or handicap.

Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion or other discrimination against students. B. RECRUITMENT Recipients may not limit their recruitment for employees to schools, communities, or companies disproportionately composed of persons of a particular race, color, national origin, sex, or handicap except for the purpose of overcoming the effects of past discrimination. Every source of faculty must be notified that the recipient does not discriminate in employment on the basis of race, color, national origin, sex, or handicap. C. PATTERNS OF DISCRIMINATION Whenever the Office for Civil Rights finds that in light of the representation of protected groups in the relevant labor market there is a significant underrepresentation or overrepresentation of protected group persons on the staff of a vocational education school or program, it will presume that the disproportion results from unlawful discrimination. This presumption can be overcome by proof that qualified persons of the particular race, color, national origin, or sex, or that qualified handicapped persons are not in fact available in the relevant labor market. D. SALARY POLICIES Recipients must establish and maintain faculty salary scales and policy based upon the conditions and responsibilities of employment, without regard to race, color, national origin, sex or handicap. E. EMPLOYMENT OPPORTUNITIES FOR HANDICAPPED APPLICANTS Recipients must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question. Recipients must make reasonable accommodation for the physical or mental limitations of handicapped applicants who are otherwise qualified unless recipients can demonstrate that the accommodation would impose an undue hardship. F. THE EFFECTS OF PAST DISCRIMINATION Recipients must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, or sex, or who are handicapped.

Required Action:

The college should consider establishing a more formal process for the screening, selection, and management of student employment and/or take measures to ensure those involved in the process are properly trained. Recommended steps should include training supervisors of students on prohibited practices, use of standardized applications and interview questions, etc. In addition, the college should monitor student hires by division or supervisor to ensure there are no patterns that could indicate possible discrimination or bias.

M.ii Employment Recruitment Notification

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

A review of the college's employment website and a sample of job openings found that all contained required non-discrimination statements.

M.iii Salary Scales & Assignments

The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review found no indication of bias or discrimination in employment practices relating to salary and assignments.

M.iv Equal Opportunity & Reasonable Accommodations

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship and unreasonable.

Non-Compliance

In interviews and communications with college staff, four employees noted that receiving reasonable accommodations for their disability had been a difficult and time consuming task. The employees were from two different departments and had all requested accommodations directly from their supervisor who worked with HR on providing the needed items. One employee stated the delay had been due to a disagreement on which department (the employee's division or HR) should bear the cost of the needed equipment. Other interviewees were unsure of what the delay was caused by. All four employees stated that receiving the accommodations had required persistent reminders and one individual stated they had only received a response after they had threatened to file a complaint.

34 CFR §100.3(c) – Where a primary objective of the Federal financial assistance to a program to which this regulation applies is to provide employment, a recipient may not (directly or through contractual or other arrangements) subject an individual to discrimination on the ground of race, color, or national origin in its employment practices under such program (including recruitment or recruitment advertising, employment, layoff or termination, upgrading, demotion, or transfer, rates of pay or other forms of compensation, and use of facilities), including programs where a primary objective of the Federal financial assistance is (i) to reduce the employment of such individuals or to help them through employment to meet subsistence needs, (ii) to assist such individuals through employment to meet expenses incident to the commencement or continuation of their education or training, (iii) to provide work experience which contributes to the education or training of such individuals, or (iv) to provide remunerative activity to such individuals who because of handicaps cannot be readily absorbed in the competitive labor market.

34 CFR §104.11 - Discrimination prohibited. - (a) General. (1) No qualified handicapped person shall, on the basis of handicap, be subjected to discrimination in employment under any program or activity to which this part applies. (2) A

recipient that receives assistance under the Education of the Handicapped Act shall take positive steps to employ and advance in employment qualified handicapped persons in programs or activities assisted under that Act. (3) A recipient shall make all decisions concerning employment under any program or activity to which this part applies in a manner which ensures that discrimination on the basis of handicap does not occur and may not limit, segregate, or classify applicants or employees in any way that adversely affects their opportunities or status because of handicap. (4) A recipient may not participate in a contractual or other relationship that has the effect of subjecting qualified handicapped applicants or employees to discrimination prohibited by this subpart. The relationships referred to in this paragraph include relationships with employment and referral agencies, with labor unions, with organizations providing or administering fringe benefits to employees of the recipient, and with organizations providing training and apprenticeships. (b) Specific activities. The provisions of this subpart apply to: (1) Recruitment, advertising, and the processing of applications for employment; (2) Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff and rehiring; (3) Rates of pay or any other form of compensation and changes in compensation; (4) Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists; (5) Leaves of absence, sick leave, or any other leave; (6) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (7) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, and selection for leaves of absence to pursue training; (8) Employer sponsored activities, including those that are social or recreational; and (9) Any other term, condition, or privilege of employment. (c) A recipient's obligation to comply with this subpart is not affected by any inconsistent term of any collective bargaining agreement to which it is a party.

34 CFR §104.12 - Reasonable accommodation. (a) A recipient shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified handicapped applicant or employee unless the recipient can demonstrate that the accommodation would impose an undue hardship on the operation of its program or activity. (b) Reasonable accommodation may include: (1) Making facilities used by employees readily accessible to and usable by handicapped persons, and (2) Job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, the provision of readers or interpreters, and other similar actions. (c) In determining pursuant to paragraph (a) of this section whether an accommodation would impose an undue hardship on the operation of a recipient's program or activity, factors to be considered include: (1) The overall size of the recipient's program or activity with respect to number of employees, number and type of facilities, and size of budget; (2) The type of the recipient's operation, including the composition and structure of the recipient's workforce; and (3) The nature and cost of the accommodation needed. (d) A recipient may not deny any employment opportunity to a qualified handicapped employee or applicant if the basis for the denial is the need to make reasonable accommodation to the physical or mental limitations of the employee or applicant.

34 CFR §104.13 - Employment criteria. - (a) A recipient may not make use of any employment test or other selection criterion that screens out or tends to screen out

handicapped persons or any class of handicapped persons unless: (1) The test score or other selection criterion, as used by the recipient, is shown to be job-related for the position in question, and (2) Alternative job-related tests or criteria that do not screen out or tend to screen out as many handicapped persons are not shown by the Director to be available. (b) A recipient shall select and administer tests concerning employment so as best to ensure that, when administered to an applicant or employee who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's or employee's job skills, aptitude, or whatever other factor the test purports to measure, rather than reflecting the applicant's or employee's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure).

34 CFR §104.14 – Preemployment inquiries. (a) Except as provided in paragraphs (b) and (c) of this section, a recipient may not conduct a preemployment medical examination or may not make preemployment inquiry of an applicant as to whether the applicant is a handicapped person or as to the nature or severity of a handicap. A recipient may, however, make preemployment inquiry into an applicant's ability to perform job-related functions. (b) When a recipient is taking remedial action to correct the effects of past discrimination pursuant to 104.6 (a), when a recipient is taking voluntary action to overcome the effects of conditions that resulted in limited participation in its federally assisted program or activity pursuant to 104.6(b), or when a recipient is taking affirmative action pursuant to section 503 of the Act, the recipient may invite applicants for employment to indicate whether and to what extent they are handicapped, Provided, That: (1) The recipient states clearly on any written questionnaire used for this purpose or makes clear orally if no written questionnaire is used that the information requested is intended for use solely in connection with its remedial action obligations or its voluntary or affirmative action efforts; and (2) The recipient states clearly that the information is being requested on a voluntary basis, that it will be kept confidential as provided in paragraph (d) of this section, that refusal to provide it will not subject the applicant or employee to any adverse treatment, and that it will be used only in accordance with this part. (c) Nothing in this section shall prohibit a recipient from conditioning an offer of employment on the results of a medical examination conducted prior to the employee's entrance on duty, Provided, That: (1) All entering employees are subjected to such an examination regardless of handicap, and (2) The results of such an examination are used only in accordance with the requirements of this part. (d) Information obtained in accordance with this section as to the medical condition or history of the applicant shall be collected and maintained on separate forms that shall be accorded confidentiality as medical records, except that: (1) Supervisors and managers may be informed regarding restrictions on the work or duties of handicapped persons and regarding necessary accommodations; (2) First aid and safety personnel may be informed, where appropriate, if the condition might require emergency treatment; and (3) Government officials investigating compliance with the Act shall be provided relevant information upon request.

34 CFR §106.51 – (a) General. (1) No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in employment, or recruitment, consideration, or selection therefor, whether full-time or part-time, under any education program or activity operated by a recipient which

receives Federal financial assistance. (2) A recipient shall make all employment decisions in any education program or activity operated by such recipient in a nondiscriminatory manner and shall not limit, segregate, or classify applicants or employees in any way which could adversely affect any applicant's or employee's employment opportunities or status because of sex. (3) A recipient shall not enter into any contractual or other relationship which directly or indirectly has the effect of subjecting employees or students to discrimination prohibited by this subpart, including relationships with employment and referral agencies, with labor unions, and with organizations providing or administering fringe benefits to employees of the recipient. (4) A recipient shall not grant preferences to applicants for employment on the basis of attendance at any educational institution or entity which admits as students only or predominantly members of one sex, if the giving of such preferences has the effect of discriminating on the basis of sex in violation of this part. (b) Application. The provisions of this subpart apply to: (1) Recruitment, advertising, and the process of application for employment; (2) Hiring, upgrading, promotion, consideration for and award of tenure, demotion, transfer, layoff, termination, application of nepotism policies, right of return from layoff, and rehiring; (3) Rates of pay or any other form of compensation, and changes in compensation; (4) Job assignments, classifications and structure, including position descriptions, lines of progression, and seniority lists; (5) The terms of any collective bargaining agreement; (6) Granting and return from leaves of absence, leave for pregnancy, childbirth, false pregnancy, termination of pregnancy, leave for persons of either sex to care for children or dependents, or any other leave; (7) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (8) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, selection for tuition assistance, selection for sabbaticals and leaves of absence to pursue training; (9) Employer-sponsored activities, including those that are social or recreational; and (10) Any other term, condition, or privilege of employment.

34 CFR §106.52 - Employment criteria. - A recipient shall not administer or operate any test or other criterion for any employment opportunity which has a disproportionately adverse effect on persons on the basis of sex unless: (a) Use of such test or other criterion is shown to predict validly successful performance in the position in question; and (b) Alternative tests or criteria for such purpose, which do not have such disproportionately adverse effect, are shown to be unavailable.

34 CFR §106.53 - Recruitment - (a) Nondiscriminatory recruitment and hiring. A recipient shall not discriminate on the basis of sex in the recruitment and hiring of employees. Where a recipient has been found to be presently discriminating on the basis of sex in the recruitment or hiring of employees, or has been found to have in the past so discriminated, the recipient shall recruit members of the sex so discriminated against so as to overcome the effects of such past or present discrimination. (b) Recruitment patterns. A recipient shall not recruit primarily or exclusively at entities which furnish as applicants only or predominantly members of one sex if such actions have the effect of discriminating on the basis of sex in violation of this subpart.

34 CFR §106.54 – Compensation - A recipient shall not make or enforce any policy or practice which, on the basis of sex: (a) Makes distinctions in rates of pay or other compensation; (b) Results in the payment of wages to employees of one sex at a rate less than that paid to employees of the opposite sex for equal work on jobs the performance of which requires equal skill, effort, and responsibility, and which are performed under similar working conditions.

34 CFR §106.55 - Job classification and structure - A recipient shall not: (a) Classify a job as being for males or for females; (b) Maintain or establish separate lines of progression, seniority lists, career ladders, or tenure systems based on sex; or (c) Maintain or establish separate lines of progression, seniority systems, career ladders, or tenure systems for similar jobs, position descriptions, or job requirements which classify persons on the basis of sex, unless sex is a bona-fide occupational qualification for the positions in question as set forth in §106.61.

34 CFR §106.56 - Fringe benefits - (a) Fringe benefits defined. For purposes of this part, fringe benefits means: Any medical, hospital, accident, life insurance or retirement benefit, service, policy or plan, any profit-sharing or bonus plan, leave, and any other benefit or service of employment not subject to the provision of §106.54. (b) Prohibitions. A recipient shall not: (1) Discriminate on the basis of sex with regard to making fringe benefits available to employees or make fringe benefits available to spouses, families, or dependents of employees differently upon the basis of the employee's sex; (2) Administer, operate, offer, or participate in a fringe benefit plan which does not provide either for equal periodic benefits for members of each sex, or for equal contributions to the plan by such recipient for members of each sex; or (3) Administer, operate, offer, or participate in a pension or retirement plan which establishes different optional or compulsory retirement ages based on sex or which otherwise discriminates in benefits on the basis of sex.

34 CFR 106.57 – **Marital or parental status** - (a) General. A recipient shall not apply any policy or take any employment action: (1) Concerning the potential marital, parental, or family status of an employee or applicant for employment which treats persons differently on the basis of sex; or (2) Which is based upon whether an employee or applicant for employment is the head of household or principal wage earner in such employee's or applicant's family unit. (b) Pregnancy. A recipient shall not discriminate against or exclude from employment any employee or applicant for employment on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom. (c) Pregnancy as a temporary disability. A recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom and any temporary disability resulting therefrom as any other temporary disability for all job related purposes, including commencement, duration and extensions of leave, payment of disability income, accrual of seniority and any other benefit or service, and reinstatement, and under any fringe benefit offered to employees by virtue of employment. (d) Pregnancy leave. In the case of a recipient which does not maintain a leave policy for its employees, or in the case of an employee with insufficient leave or accrued employment time to qualify for leave under such a policy, a recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom as a justification for a leave of

absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status which she held when the leave began or to a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

34 CFR 106.58 - *Effect of State or local law or other requirements - (a) Prohibitory requirements. The obligation to comply with this subpart is not obviated or alleviated by the existence of any State or local law or other requirement which imposes prohibitions or limits upon employment of members of one sex which are not imposed upon members of the other sex. (b) Benefits. A recipient which provides any compensation, service, or benefit to members of one sex pursuant to a State or local law or other requirement shall provide the same compensation, service, or benefit to members of the other sex.*

34 CFR 106.59 - *Advertising. - A recipient shall not in any advertising related to employment indicate preference, limitation, specification, or discrimination based on sex unless sex is a bona-fide occupational qualification for the particular job in question.*

34 CFR 106.60 – *Pre-employment inquiries - (a) Marital status. A recipient shall not make pre-employment inquiry as to the marital status of an applicant for employment, including whether such applicant is “Miss or Mrs.” (b) Sex. A recipient may make pre-employment inquiry as to the sex of an applicant for employment, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part.*

34 CFR 106.61 – *Sex as a bona-fide occupational qualification. - A recipient may take action otherwise prohibited by this subpart provided it is shown that sex is a bona-fide occupational qualification for that action, such that consideration of sex with regard to such action is essential to successful operation of the employment function concerned. A recipient shall not take action pursuant to this section which is based upon alleged comparative employment characteristics or stereotyped characterizations of one or the other sex, or upon preference based on sex of the recipient, employees, students, or other persons, but nothing contained in this section shall prevent a recipient from considering an employee's sex in relation to employment in a locker room or toilet facility used only by members of one sex.*

34 CFR 100 Appendix B (Guidelines VIII-(A)-(F) – **A. EMPLOYMENT GENERALLY** - *Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or handicap. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion or other discrimination against students.* **B. RECRUITMENT** *Recipients may not limit their recruitment for employees to schools, communities, or companies disproportionately composed of persons of a particular race, color, national origin, sex, or handicap except for the purpose of overcoming the effects of past discrimination. Every source of faculty must be notified that the recipient does not discriminate in employment on the basis of race, color, national origin, sex, or handicap.* **C. PATTERNS OF DISCRIMINATION** *Whenever the Office for Civil Rights*

finds that in light of the representation of protected groups in the relevant labor market there is a significant underrepresentation or overrepresentation of protected group persons on the staff of a vocational education school or program, it will presume that the disproportion results from unlawful discrimination. This presumption can be overcome by proof that qualified persons of the particular race, color, national origin, or sex, or that qualified handicapped persons are not in fact available in the relevant labor market. D. SALARY POLICIES Recipients must establish and maintain faculty salary scales and policy based upon the conditions and responsibilities of employment, without regard to race, color, national origin, sex or handicap. E. EMPLOYMENT OPPORTUNITIES FOR HANDICAPPED APPLICANTS Recipients must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question. Recipients must make reasonable accommodation for the physical or mental limitations of handicapped applicants who are otherwise qualified unless recipients can demonstrate that the accommodation would impose an undue hardship. F. THE EFFECTS OF PAST DISCRIMINATION Recipients must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, or sex, or who are handicapped.

Required Action:

The college has a reasonable accommodation policy, however the policy does not establish responsibility for ensuring the accommodation has been provided or provide time frames for providing accommodations. In addition, the policy does not determine who should bear the cost of accommodations. It is recommended the college establish processes designed to ensure employees requesting assistance are aware of the status of their request regularly and to set time frames for the process. It is also recommended the college clarify who has the responsibility for paying needed accommodations and take measures to ensure all requests are managed centrally by an individual/division with the necessary training and authority to provide accommodations and not by individual supervisors and departments.

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|------------------------------|
| Other Recommendations |
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- A review of demographics for students and employees on campus found that the enrollment and employment of Hispanic/Latino individuals is significantly below the area population. According to the latest US Census information the average Hispanic population in the area is 37.75%. The percent of Hispanic students enrolled in all programs at the college in 2018 was only 21.66% and 22.75% in CTE programs. The percentage of Hispanic employees at the college was only 14.05% for 2018.

Demographic information on the student population also shows a substantial variance between the population in the surrounding community that speak a language other than English and students enrolled at the college. US Census data shows an average of 33% of the population in the area speak a language other than English, but only 2% of the college's student population report speaking a language other than English.

- We recommend the college review its recruitment, marketing, counseling and acceptance processes and information provided to prospective students to ensure these variances aren't due to any practice or actions by the college. We further recommend the college look into ways to attract and increase the numbers of these special population to better reflect the college's service area and community.
- Interviewees also expressed their opinion that the college should re-evaluate the tools and methods used to reach students and how it engages them. Staff and students stated that they felt that current methods of working with the student population were no longer successful in engaging the campus and leadership should think outside the box to successfully market and advertise, and to make students feel included and engaged. These efforts would also be useful in promoting the various services available to students. Some interviewees suggested using surveys and focus groups to find these new tools.
- BBCC requires Title IX training during on-boarding for all regular employees and certain students, but not for part-time employees and adjunct faculty. This presents a risk to the college, especially for individuals with direct access to students. It is recommended the college require Title IX training for part-time staff and adjunct faculty.
- The college has been experiencing significant morale issues in the last several years. Many of these changes appear to be the result of growth and changes in the higher education industry which has resulted in the college losing its small community characteristics and dealing with new budgetary and compliance challenges. To address these new challenges, the college's Executive management have been making efforts to address concerns of the campus community in various ways. Unfortunately many interviewees did not feel these efforts were genuine and did not feel the challenges were being addressed. Interviewees were asked what steps could be taken to improve this situation. A few consistent themes that emerged during these discussions were as follows:
 - Many of the college's employees reported that they were paid significantly less than their counterparts in other colleges and that their workload had significantly increased without a change in job classification or pay. It is recommended the college consider performing a campus-wide study of positions and perform benchmarking of all campus staff, and make attempts to align on-campus jobs with the industry.
 - Another consistent theme emerging from interviews is the perception that both students and staff do not have a voice and do not feel safe in expressing their opinions, grievances, and thoughts. Interviewees stated that many campus employees do not trust members of Executive Management and are not comfortable voicing concerns, despite recent efforts to improve the

campus environment. The majority of interviewees stated they would welcome an outside impartial, independent, and non-judgmental liaison for both staff and students to express themselves. In addition, more open communication and dialog would also be useful to promote transparency and to create cross divisional trust. Several interviewees stated they believed taking these steps would restore some trust on campus.

- One of the steps taken by Executive Management to combat morale issues on campus was the formation of a Committee on Equity, Inclusion and Diversity (CEID). The work and existence of this committee appears to be a positive step on campus, however interviewees stated the committee did not have the leadership and authority to make changes. As such recommendations and conclusions by the group had not been acted upon or implemented. It is recommended the college appoint someone in leadership and with the necessary authority to take ownership of the committee and implement committee recommendations.
- As previously noted, the college appears to be experiencing many changes. One of these changes has been the entry of many new non-traditional students and minorities in the community and the college. Several interviewees stated that the college community was not trained on how to assimilate certain groups, especially those from the LGBTQ community. Both students and staff stated training in diversity issues, bias, and inclusion was a need on campus and stressed that training in dealing with LGBTQ community members was crucial.
- The college serves a large Spanish speaking community ranging from 30% to 40% of the area's general population. Despite this large population, there are no signs in Spanish on campus. This was also mentioned by several interviewees, who suggested placing some basic signs on campus to assist those not fluent in English to navigate the campus and to identify basic and important locations such as Student Services and Basic Adult Education.
- The college has identified that it serves a large Spanish speaking community. A review of current demographics and interviews with the campus community noted that there are new groups settling in the area that speak Russian/Ukrainian and Japanese, however currently they don't meet the definition of a "community". To ensure continued compliance with civil rights requirements, it is recommended the college adopt a consistent way to determine if it serves a community speaking a language other than English, and periodically evaluate the need to take steps to market, recruit and communicate to these communities.
- Students and staff interviewed complained about lack of available places on campus to do group work. The interviewees pointed out that group studies promoted inclusiveness with the campus community and was helpful in academics. The

students stated that some spaces previously available for this purpose had been taken away, along with some study aides such as white boards, and this had created hardships for some programs such as Nursing. They mentioned that the library was mostly designed for individual work and due to the noise involved in group activity, spaces for group work were badly needed.

Attachment A

Applicable Requirements

Guidelines Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

General compliance

This review was conducted pursuant to OCR's authority under Section 504 and its implementing regulations at 34 C.F.R. Part 104 and Title II of the ADA and its implementing regulations at 28 C.F.R. Part 35. These laws prohibit discrimination on the basis of disability by institutions receiving federal financial assistance from the U.S. Department of Education and by public entities. As a public college that is also a recipient of financial assistance from the Department, the college is subject to the provisions of Section 504 and Title II.

For existing facilities, Section 504 and Title II require that an institution operate its program so that, when viewed in its entirety, it is readily accessible to persons with disabilities (program accessibility standard). Under this standard, an institution is not required to make all existing facilities or every part of its facilities accessible, as long as the program or activity provided at each facility is readily accessible to persons with disabilities. See 34 C.F.R. 104.22 and 28 C.F.R. 35.150. An institution can provide program accessibility for existing facilities through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, or any other methods that result in making its programs or activities accessible to persons with disabilities.

The accessibility standard used for each asset depends on the date construction commenced. Construction commenced after June 3, 1977, through January 26, 1992, must comply with the American National Standards Institute standards (ANSI). For construction projects starting January 26, 1992 through March 12, 2012, the 1991 ADA standards must be met. The colleges chose to follow the 1991 ADA standards rather than the UFAS standards where the option existed during this period. Any construction starting after March 12, 2012 must comply with the 2010 ADA standards identified in the International Building Code. New alterations to a facility or part of a facility are analyzed similarly to new construction.

The available facility construction and alteration dates for all Washington State buildings do not typically include accurate month and day information. The available data includes the year of construction and/or major renovation substantial completion. A major renovation is recorded when a construction renovation project includes at least one major building component and the cost is more than 60% of the building component value. Typically, major renovations address

most building components and require compliance with current building code. Since the building construction or renovation date reflects the end of construction, the start of construction or renovation was calculated based on a typical two-year construction period. The accessibility standard identified in the building list below reflects the beginning of construction dates. If no construction date data was available, the current standard was applied.

Parking Lots

Accessible parking spaces within student parking lots are the start of the accessible route to an accessible student program or activity. Therefore, all parking lots that are designated as student parking must be configured to eliminate all barriers along the accessible route to student programs and activities.

College parking lots are typically designated and reviewed individually (per Advisory section 208.2 in the 2010 ADA Standards) rather than as a whole campus. A college typically has dozens of parking lots that are loosely connected and hard to delineate. Typically lot boundaries are defined by physical barriers that restrict access between lots (lack an accessible route between lots or separated by significant distance). However, ADA parking spaces may be clustered in one or more lots if equivalent or greater accessibility is provided in terms of distance from the accessible entrance, parking fees and convenience. These requirements apply to free parking or any type of paid parking. If only paid parking is provided and the College also provides free visitor spaces, then the visitor spaces should be considered a separate lot and will require accessible parking.

Since parking lot resurfacing or restriping efforts are not recorded in a database, the age of the lots are not known. Parking lots are typically maintained, where resurfacing occurs roughly every twenty years. Therefore, all parking lots were reviewed with the assumption that they were no more than 20 years old. Nearly all college campuses are more than 20 years old. In cases where the parking lot appeared to have been recently striped (within 5 years) or was part of a new campus construction project, the current accessibility standard was applied.

Accessible Routes

An accessible route must be a continuous, unobstructed path connecting all accessible elements and spaces within and between buildings or facility elements where student programs or activities are provided by the college. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts. While not every route is required to be accessible, an accessible route must exist between all student programs or activities provided by the college. Alternate routes are allowable when the route does not require students with disabilities to traverse greater distances or in unfavorable

conditions. All non-accessible parking areas and pedestrian routes should be marked as such with directional signage to the nearest accessible area or route.

Summary of Findings and Analysis

The following chart indicates the start of construction / alteration dates for the college facilities as well as the applicable accessibility standards.

| Building | Start of Construction, Major Renovation or acquisition (Most Recent Date) | Applicable Accessibility Standard |
|------------------------|---|--|
| Aircraft Hanger | 1954 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Airframe & Powerplant | 1954 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Allied Health | 1950 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Amp Engine Run Station | 2002 | 1991 Standard |
| Auto Mechanics | 1954 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Aviation | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Childcare Facility | 2002 | 1991 Standard |
| Fine Arts | 2006 | 1991 Standard |
| Grounds Building | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |

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|----------------------------|------|---|
| Liberal Arts & Business | 1983 | ANSI Standard |
| Library/Atec | 2002 | 1991 Standard |
| Maintenance | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Pe/Comm.Activity Center | 1979 | ANSI Standard |
| Philips Hall | 1961 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Shop | 1970 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Storage-Behind Bldg 3300 | 1974 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Student Center/Admin. | 2014 | 2010 Standard |
| Van Garage | 2004 | 1991 Standard |
| Viking Hall | 1961 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Wallenstien Perform. Arts | 1957 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Welding Lab | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Maintenance Mechanics Tech | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Science, Engineering, Math | 1959 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |

| | | |
|-----------------------------|---------|---|
| Childcare Co-Op | 1957 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Paint/Carpentry Maintenance | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Auto Classrooms | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Comp Science | 1950 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Industrial Elec Tech | 1953 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Testing Ctr/Trio Upward Bnd | 1957 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Baseball Announcers Booth | 1984 | ANSI Standard |
| Softball Announcers Booth | 2013 | 2010 Standard |
| Opportunity Building | Unknown | 2010 Standard |

Site Accessibility Compliance

S-1 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Auto Classrooms building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0495 in appendix.

Additional Field Notes: One sign missing. One sign at 36".

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required

accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-2 **Non-Compliance:** The accessible parking spaces do not comply with the width and access aisle accessibility requirements near the Comp Science building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0496 in appendix.

Additional Field Notes: Striping is missing and bottom of signs must be at 60" above grade.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking spaces that comply with the width and access aisle requirements.

Current ADA Standard: 502.2 Vehicle Spaces. Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3.EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.

- S-3 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Comp Science building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0497 in appendix.

Additional Field Notes: The ramp at the front entrance must not have transitions greater than 1/2" if there is a beveled edge. Also, the initial 8" of the curb is too steep (11 degree slope). The curb cut must be 1\12 slope max.

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform

lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-4 **Non-Compliance:** The sidewalk slope is too steep near the Philips Hall building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0503 in appendix.

Additional Field Notes: The damaged asphalt must be repaired along the accessible route. Some slopes as much as 10 degrees.

Applicable Standard (1991 ADA Standards):4.3.7 Slope. An accessible route with a running slope greater than 1:20 is a ramp and shall comply with 4.8. Nowhere shall the cross slope of an accessible route exceed 1:50.

Required Action to correct non-compliant component: An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided.

Current ADA Standard: 403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.

- S-5 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Philips Hall building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0504 in appendix.

Additional Field Notes: Signs must be mounted at 60" above grade to be visible above vehicles. Signs at 48".

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-6 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Liberal Arts & Business building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0505 in appendix.

Additional Field Notes: Transition on curb cut greater than 1/2".

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-7 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Student Center/Admin. building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0513 in appendix.

Additional Field Notes: The signs need to be raised to 60" above grade. One sign needs to also indicate that the stall is van accessible. One sign is missing.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall

include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-8 **Non-Compliance:** The access ramp is too steep near the Testing Ctr/Trio Upward Bnd building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0516 in appendix.

Additional Field Notes: Slope is 7 degrees.

Applicable Standard (1991 ADA Standards):4.8.2* Slope and Rise. The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be :12. The maximum rise for any run shall be 30 in (760 mm) (see Fig. 16). Curb ramps and ramps to be constructed on existing sites or in existing buildings or facilities may have slopes and rises as allowed in 4.1.6(3)(a) if space limitations prohibit the use of a 1:12 slope or less.

Required Action to correct non-compliant component: The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches.

Current ADA Standard: 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. Exception: In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

- S-9 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Testing Ctr/Trio Upward Bnd building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0517 in appendix.

Additional Field Notes: Move sign up above 60" and add van sign.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs

shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-10 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Wallenstien Perform. Arts building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0518 in appendix.

Additional Field Notes: One must also include van sign.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-11 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Wallenstien Perform. Arts building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0519 in appendix.

Additional Field Notes: Signs must be moved up to 60" above grade. One must also include van sign.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs

shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-12 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Wallenstein Perform. Arts building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0520 in appendix.

Additional Field Notes: Transition at access isle is 3/4"

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-13 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Science, Engineering, Math building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0524 in appendix.

Additional Field Notes: Two signs must be raised to 60". Both signs must include van signs. Five other stalls must have signs installed.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs

shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-14 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Science, Engineering, Math building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0525 in appendix.

Additional Field Notes: 3/4" transition.

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-15 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Childcare Co-Op building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0529 in appendix.

Additional Field Notes: Top of ramp has 3/4" transition.

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level

between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

- S-16 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Pe/Comm.Activity Center building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0530 in appendix.

Additional Field Notes: Two signs must be raised to 60". Four stalls must have signs installed.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-17 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Pe/Comm.Activity Center building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0531 in appendix.

Additional Field Notes: There are several transitions and cracks along the accessible route from the parking area to the gym that are greater than 1/2".

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level

between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

Building Accessibility Compliance

- B-1 **Non-Compliance:** There is not enough knee clearance under the table near room 3003 of the Aviation building. See photo exhibit ADA0490 in appendix.

Field Notes: provide at least one accessible table

Applicable Standard: The most recent construction or major renovation efforts began in 1953 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) wide minimum. 306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (430 mm) minimum under the element.

- B-2 **Non-Compliance:** The door does not have a big enough clear floor area in front of the door near room 3024 of the Aviation building. See photo exhibit ADA0491 in appendix.

Field Notes: Men's door does not have room to meet standard. College can install powered opener to comply.

Applicable Standard: The most recent construction or major renovation efforts began in 1953 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide a clear floor area in front a door approach that extends at least twelve (12) inches beyond the latch side door jamb and has a length of at least forty eight (48) inches in front of the door. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.2

B-3 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 3024 of the Aviation building. See photo exhibit ADA0492 in appendix.

Field Notes: Something must be installed for cane detection.

Applicable Standard: The most recent construction or major renovation efforts began in 1953 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

B-4 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 3024 of the Aviation building. See photo exhibit ADA0493 in appendix.

Field Notes: Move display down.

Applicable Standard: The most recent construction or major renovation efforts began in 1953 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-5 Non-Compliance: The sink drain pipe and hot water lines are not insulated or protected in room 41wr of the Auto Classrooms building. See photo exhibit ADA0494 in appendix.

Field Notes: Also men's bathroom.

Applicable Standard: The most recent construction or major renovation efforts began in 1953 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured

to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

- B-6 Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 1501 of the Comp Science building. See photo exhibit ADA0498 in appendix.

Field Notes: The display items are at 54" above floor level. Move display down.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-7 Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected near room 1500 of the Comp Science building. See photo exhibit ADA0499 in appendix.

Field Notes: Both bathrooms.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-8 **Non-Compliance:** The coat hooks are not located in a reachable range near room 1500 of the Comp Science building. See photo exhibit ADA0500 in appendix.

Field Notes: Both bathrooms..

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-9 **Non-Compliance:** The coat hooks are not located in a reachable range near room 1500 of the Comp Science building. See photo exhibit ADA0501 in appendix.

Field Notes: Both bathrooms..

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-10 **Non-Compliance:** The urinal basin rim is located too high near room 1500 of the Comp Science building. See photo exhibit ADA0502 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate the urinal basin rim at seventeen (17) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 213.3.3 Urinals. Where more than one urinal is provided, at least one shall comply with 605.2 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

- B-11 **Non-Compliance:** The sink rim height is too high in room 1731 of the Allied Health building. See photo exhibit ADA0506 in appendix.

Field Notes: One sink must comply. A self-contained portable sink would be

acceptable.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate the sink rim at thirty four (34) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.3 Height. Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground. EXCEPTIONS: 1. A lavatory in a toilet or bathing facility for a single occupant accessed only through a private office and not for common use or public use shall not be required to comply with 606.3.2. In residential dwelling unit kitchens, sinks that are adjustable to variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted where rough-in plumbing permits connections of supply and drain pipes for sinks mounted at the height of 29 inches (735 mm).

B-12 Non-Compliance: The opening force is too great in room 1731 of the Allied Health building. See photo exhibit ADA0507 in appendix.

Field Notes: Opening force is 12 pounds.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Adjust door opening force so that it is less than five pounds for interior and fifteen (15) pounds for exterior doors. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.9 Door and Gate Opening Force. Fire doors shall have a minimum opening force allowable by the appropriate administrative authority. The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds (22.2 N) maximum. 2. Sliding or folding doors: 5 pounds (22.2 N) maximum. These forces do not apply to the force required to retract latch bolts or disengage other devices that

hold the door or gate in a closed position. 2009 IBC 1008.1.3 Door opening force. The force for pushing or pulling open interior swinging egress doors, other than fire doors, shall not exceed 5 pounds (22 N). For other swinging doors, as well as sliding and folding doors, the door latch shall release when subjected to a 15-pound (67 N) force. The door shall be set in motion when subjected to a 30-pound (133 N) force. The door shall swing to a full-open position when subjected to a 15-pound (67 N) force.

- B-13 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 1720 of the Allied Health building. See photo exhibit ADA0508 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-14 **Non-Compliance:** The urinal basin rim is located too high near room 1706 of the Allied Health building. See photo exhibit ADA0509 in appendix.

Field Notes: One urinal must comply or college must install signs directing students to a nearby accessible bathroom.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate the urinal basin rim at seventeen (17) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 213.3.3 Urinals. Where more than one urinal is provided, at least one shall comply with 605.2 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

B-15 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected near room 1706 of the Allied Health building. See photo exhibit ADA0510 in appendix.

Field Notes: Both bathrooms

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured

to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

- B-16 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 1706 of the Allied Health building. See photo exhibit ADA0511 in appendix.

Field Notes: College can install potted plant or other physical object to comply. An alternative is to swap out the fountain for a water bottle filling station with shallow profile.

Applicable Standard: The most recent construction or major renovation efforts began in 1950 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-17 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 1846A of the Library/Atec building. See photo exhibit ADA0512 in appendix.

Field Notes: Top of display at 56".

Applicable Standard: The most recent construction or major renovation efforts began in 2002 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-18 Non-Compliance: The materials or other components provided for students are not located within the accessible reach range in room 1426 of the Student Center/Admin. building. See photo exhibit ADA0514 in appendix.

Field Notes: Top of display at 70".

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the

finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-19 Non-Compliance: A building element protrudes into the circulation path more than 4" near room 14MR of the Student Center/Admin. building. See photo exhibit ADA0515 in appendix.

Field Notes: College could place object adjacent to fountain for cane detection.

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation

path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-20 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected in the Wallenstien Perform. Arts building. See photo exhibit ADA0521 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1957 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

- B-21 **Non-Compliance:** There are not enough accessible seats in room 1103 of the Wallenstien Perform. Arts building. See photo exhibit ADA0522 in appendix.

Field Notes: 1350 seats if back two rows were removed. 15 accesible seats required with accompany seats.

Applicable Standard: The most recent construction or major renovation efforts began in 1957 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Based on room capacity,

provide at least six accessible seats plus one additional seat for each additional 150 seats. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 221.2.1 Number and Location. Wheelchair spaces shall be provided complying with 221.2.1.221.2.1.1 General Seating. Wheelchair spaces complying with 802.1 shall be provided in accordance with Table 221.2.1.1.

- B-22 **Non-Compliance:** The ramp slope is too steep or the access route has a transition that is not accessible in room 1104 of the Wallenstien Perform. Arts building. See photo exhibit ADA0523 in appendix.

Field Notes: Slope is 13 degrees

Applicable Standard: The most recent construction or major renovation efforts began in 1957 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide a ramp that does not exceed a 1:12 slope. Some exceptions are allowed if there are space limitations. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. Exception: In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

- B-23 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 1229 of the Science, Enigneering, Math building. See photo exhibit ADA0526 in appendix.

Field Notes: College can place detectable object adjacent to drinking fountain.

Applicable Standard: The most recent construction or major renovation efforts began in 1959 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide cane-detectable

elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

B-24 Non-Compliance: The materials or other components provided for students are not located within the accessible reach range in room 1211 of the Science, Engineering, Math building. See photo exhibit ADA0527 in appendix.

Field Notes: The pull handle is at 56" above the floor.

Applicable Standard: The most recent construction or major renovation efforts began in 1959 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-25 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 1916 of the Fine Arts building. See photo exhibit ADA0528 in appendix.

Field Notes: The college can place cane detection objects adjacent to the drinking fountain.

Applicable Standard: The most recent construction or major renovation efforts began in 2006 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section A4.4.1 General. Service animals are trained to recognize and avoid hazards. However, most people with severe impairments of vision use the long cane as an aid to mobility. The two principal cane techniques are the touch technique, where the cane arcs from side to side and touches points outside both shoulders; and the diagonal technique, where the cane is held in a stationary position diagonally across the body with the cane tip touching or just above the ground at a point outside one shoulder and the handle or grip extending to a point outside the other shoulder. The touch technique is used primarily in uncontrolled areas, while the diagonal technique is used primarily in certain limited, controlled, and familiar environments. Cane users are often trained to use both techniques. Potential hazardous objects are noticed only if they fall within the detection range of canes (see Fig. A4). Visually impaired people walking toward an object can detect an overhang if its lowest surface is not higher than 27 in (685 mm). When walking alongside protruding objects, they cannot detect overhangs. Since proper cane and service animal techniques keep people away from the edge of a path or from walls, a slight overhang of no more than 4 in (100 mm) is not hazardous.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

2017-2018 Civil Rights Review Voluntary Compliance Plan (VCP) Big Bend Community College

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|-----------------------------------|--|
| College Contact/Liaison: | Kim Garza, Vice-President of Human Resources |
| Last Day of Site Visit: | April 19, 2019 |
| Letter of Finding Date: | September 3, 2019 |
| VCP Date: | October 29, 2019 |
| Final Completion Date: | |
| Completion Date: | |
| Final VCP Acceptance Date: | |

A ADMINISTRATIVE

Recipients need to have a certain basic requirements in place to comply with OCR Guidelines. Title IX, Section 504, and Title II. These basic procedures include an annual public notice, continuous notifications, designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II and a grievance procedure that will allow students an avenue for dealing with alleged discrimination.

(v) Continuous Notification:

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Results of Compliance Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|--|---|--------------------|-------------------------|--|
| A.i.1 | Non-Compliance - The college's website contains a complete and accurate non-discrimination statement, but an accurate and | On 4/22/19, BBCC received approval from M. Jacobs on a complete non-discrimination | Kim Garza VP of HR kimg@bigbend.edu | 1/20 | 6/19/2020 | Received the following documents with a non- |

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| | <p>complete non-discrimination statement is not included on all required publications and materials reviewed. A review of 35 printed brochures, forms, marketing pamphlets, and other documents found that none of the publications had the complete and accurate non-discrimination statement. Issues noted included no non-discrimination statement on the form, coordinator information not being listed, use of a shorten form without a link to the actual statement and various other issues. The college's 2018-19 Course Catalog has the non-discrimination statement included under "Discrimination" on page 15, but sex is not included as a protected category and information on the coordinators is not included.</p> | <p>statement to be included on all required publications and materials. New brochures and pamphlets include the approved statement. The college is currently reprinting existing marketing materials with the approved statements. A copy of the approved statement is attached.</p> <p>The college's 2018-19 Course Catalog has been updated to include "sex" as a protected category. Information on coordinators is also included.</p> <p>The college's 2019-20 catalog also includes the required information.</p> <p>Both documents are available using the link below.</p> <p>https://www.bigbend.edu/academics/course-catalog/</p> | 509.793.2010 | 10/19 | | <p>discrimination notice: Application, Poster for Mental Health Fair, Poster for student event (Dodgeball), Financial Aid information, Aviation program rack card, Automotive program rack card, Early Childhood Education Rack Card, Industrial System rack card, Nursing Rack card, Business Info mgt rack card, medical assistant rack card</p> |
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Required Action:

In accordance with the Title IX and Section 504 regulations, 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, community members, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name or title, address, and telephone number.

(vi) Title IX, Section 504, and Title II Coordinators:

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use the coordinator’s name for the contact information for printed materials, but it is not necessary. Identification of the coordinator’s title is sufficient for printed materials. For the college’s website, the name of the coordinator(s) must be included.

Results of Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|---|---|--------------------|-------------------------|--|
| A.ii | Non-Compliance: The college has designated coordinators for Title IX and disability services as required, but the complete required information on these coordinators is not included on the majority of the non-discrimination notices reviewed. In addition, in many promotional and marketing | On 4/22/19, BBCC received approval from M. Jacobs on a complete non-discrimination statement to be included on all required publications and materials. New | Kim Garza VP of HR king@bigben.d.edu 509.793.2010 | 1/20 | 6/19/2020 | Received the following documents with a non-discrimination notice: Application, Poster for |

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| | <p>materials, the contact provided for disability matters is not the designated coordinator and the reader is referred to various staff across campus for inquiries.</p> | <p>brochures and pamphlets include the approved statement. The college is currently reprinting existing marketing materials with the approved statements.</p> <p>The approved statement includes Disability Services Coordinator, Lora Allen, as the contact for disability matters and questions.</p> <p>The college's Title IX and EO Coordinator, Kim Garza is also listed as a resource for questions and concerns.</p> <p>All new materials contain the approved statement. Existing materials are being reprinted to include the approved statement. See attachment referenced in A.i.l.</p> | | | | <p>Mental Health Fair, Poster for student event (Dodgeball), Financial Aid information, Aviation program rack card, Automotive program rack card, Early Childhood Education Rack Card, Industrial System rack card, Nursing Rack card, Business Info mgt rack card, medical assistant rack card</p> |
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Required Action:

In accordance with the Title IX and Section 504 regulations, 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, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

If the college requires or prefers someone to initially intake and screen calls and then refer them to coordinators, it is recommended that this role be limited to individuals with the required civil rights training to ensure inquiries are correctly processed and managed.

(vii) Annual Public Notification:

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and disabled individuals. A brief summary of program offerings and admission criteria should be included in the annual announcement, as well as the name, address and telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|---|---|--------------------|-------------------------|---|
| A.iii | Non-Compliance: Big Bend Community College has its annual non-discrimination statement published on its website under “non-discrimination policy”. The published statement includes all required elements, but is not available in Spanish for the college’s Spanish | The college is in the process of selecting a vendor to provide written translation services. Sample documents have been translated by 6 vendors. A committee will review the translations and | Kim Garza VP of HR kimg@bigbend.edu 509.793.2010 | 1/20 | Mar 2020 | Annual statement is posted on the college’s public website continuously starting in March 2020. The |

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| | community members with limited English proficiency. | make a decision regarding vendor selection by November 11, 2019. The selected vendor will translate the non-discrimination statement. | | | | statement meets all requirements. |
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Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term, which includes all required components noted above. The notification should include a brief summary of the college’s program offerings, admission criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that will reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area.

In addition, since the college has acknowledged that its service area includes one or more “communities of national origin minority persons with limited English language skills”, it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them.

(viii) Grievance Procedures:

Federal law requires colleges to adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

| Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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A.iv The investigation did not reveal any evidence of a violation.

B SITE LOCATION AND STUDENT ELIGIBILITY CRITERIA

Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability. Issues that could result in discrimination or segregation include the selection of certain sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, national origin, sex, or disability.

(iv) Student Eligibility:

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminates on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocation education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| B.i | The investigation did not reveal any evidence of a violation. | | | | | |

(v) Site Selection and Modifications:

Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| B.ii | The investigation did not reveal any evidence of a violation. | | | | | |

(vi) Residency:

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| B.iii | The investigation did not reveal any evidence of a violation. | | | | | |

C RECRUITMENT

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should include individuals from different races, national origins, sex, and disabilities.

(vii) Recruitment Activities:

Recipients must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| C.i | The investigation did not reveal any evidence of a violation. | | | | | |

(viii) Recruitment Materials:

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|---|----------------------|------------------------|-------------|------------------|-------------------|
| C.ii | The investigation did not reveal any evidence of a violation. | | | | | |

(ix) Recruitment Teams:

To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------|---|----------------------|------------------------|-------------|------------------|-------------------|
| C.iii | The investigation did not reveal any evidence of a violation. | | | | | |

(x) Counseling LEP/Sensory Impairments:

Recipients must ensure that counselors can effectively communicate with individuals with limited English proficiency and sensory impairments.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|---|---|---|-------------|------------------|--|
| C.iv | Non-Compliance: The college's counseling and advising staff include individuals fluent in Spanish who are able to serve the Spanish speaking communities in the area. However interviews with staff indicated that the college has seen a large increase in students with hearing impairments. | BBCC provides the following resources for communicating with individuals with sensory impairments (specifically hearing impairments): <ul style="list-style-type: none"> • BBCC has an Accessaphone, which | Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010 | 1/20 | 6/19/2020 | Received copy of email sent to student services staff on 1/23/20 with a list of resources to |

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| | <p>Currently the college does not have a process or plan to ensure counselors and other student services staff can effectively communicate with individuals from this population.</p> | <p>is a software application installed on a PC and is designed for individuals who are deaf or hard of hearing and/or who wish to communicate with those who use TTY/TDD machines. It is located in the Counseling/Advising/DSS office area in the 1400 building.</p> <ul style="list-style-type: none">• DSS has an Amplified Listener and a Hearing Helper Personal FM System that students can check out. These devices amplify the volume of lectures or conversations.• BBCC currently has contracts with two sign language interpreters to provide live interpreting services for deaf and hearing-impaired individuals that use American Sign | | | | <p>assist in providing services to students with hearing disabilities</p> |
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| | | <p>Language. Potential and current students and guests can request an interpreter as an accommodation through the DSS office for BBCC events and any other college business. All event flyers have contact information for those wanting to request accommodations.</p> <ul style="list-style-type: none">• BBCC currently has a contract with CCGroup for video remote interpreting when a live interpreter is not available for deaf and hearing-impaired individuals. They can often interpret on-demand when requested. They can also provide real-time captioning when needed.• Videos on the BBCC website and videos for course content are captioned. Video | | | | |
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| | | <p>transcripts can also be made available when requested.</p> <ul style="list-style-type: none"> • Other methods of communicating with students that are hearing-impaired include typing back and forth on a computer, texting and email communication. <p>The college will provide written notice to Counselors, Advisors, Outreach/Recruitment Coordinator, Dual Enrollment Coordinator, and other Student Services staff on the availability of these resources by December 31,2019.</p> | | | | |
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Required Action:

The college should take steps to ensure individuals involved in recruitment, counseling, and student services have the necessary tools and resources to communicate effectively with individuals with various disabilities to include hearing impairments.

(xi) **Promotional Effects:**

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|--|---|--------------------|-------------------------|---|
| C.v | <p><u>Non-Compliance:</u> A review of pictures on promotional materials found several that could have the effect of perpetuating stereotypes. The pictures on the Automotive Technology, Aviation Maintenance Technology, Industrial system Technology, and Simulation Technology programs all only included males, with two of the brochures showing only Caucasian males. The pictures on the rack cards for Business Information Management, Early Childhood Education, Medical Assistant, and the Nursing programs depicted only females. Some of the videos on-line for various programs could also be perceived as perpetuating stereotypes. The video for the CDL program only shows males. In addition, none of the material reviewed contained a depiction of an individual that appeared to be</p> | <p>Promotional materials have been redesigned to remove pictures that could have the effect of perpetuating stereotypes.</p> <p>New pictures portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities.</p> <p>The college is in the process of reprinting these promotional materials with an expected completion date of December 2019.</p> | <p>Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010</p> | <p>12/19</p> | <p>6/19/20</p> | <p>Received new handouts: Aviation (female student), Automotive (Hispanic student), Early Childhood (Hispanic female), Nursing (male and individual of color), Simulation technology (student of color), Medical assistant (student of color)</p> |

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| | Asian/Pacific Islander and very few images contained African-Americans or individuals with disabilities. | | | | | |
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Required Action:

The college should review pictures and illustrations contained in promotional and advertising material and ensure they portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities. The college should take measures to ensure material being used do not contain pictures that perpetuate stereotypes.

(xii) Promotional Effects:

If a recipient's service area contains a community with person of limited English proficiency, information must be available to that community in its language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|---|-------------|------------------|--|
| C.vi | Non-Compliance: Although the college serves a large Spanish speaking population, none of the advertising and promotional materials reviewed were available in Spanish. | The college is in the process of selecting a vendor to provide written translation services. Sample documents have been translated by 6 vendors. A committee will review the translations and make a decision regarding vendor selection by November 11, 2019. Once selected, materials will be translated to | Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010 | 9/20 | Nov 2020 | Send sample brochures and pamphlets in Spanish. Per BBCC: The promotional materials are available in Admissions/Registration/Financial Aid, Workforce Education Services, Career Services, |

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| | | <p>Spanish and made available in our community.</p> <p>The department of Institutional Research & Planning will annually review the demographic make-up of our service district to determine if materials should be offered in any other languages.</p> | | | | <p>the Bonaudi Library, Counseling Center, Outreach & Recruitment, as well as a number of buildings on campus. These are also used at outreach events in schools and other locations.</p> |
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Required Action:

The college should begin the process of translating materials to Spanish for community members that are not native English speakers. In addition, the college should periodically assess the community it serves to determine if materials should be offered in any other languages.

D ADMISSIONS

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex, or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

(vii) Discriminatory Criteria:

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.i | The investigation did not reveal any evidence of a violation. | | | | | |

(viii) Preadmission Inquiries:

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|---|--------------------|-------------------------|---|
| D.ii | Non-Compliance: The college's Application for Admission requires perspective students to state if they are a "single parent". Federal law prohibits questions pertaining to an individual's familial status and disabilities on admission forms. | The Admissions & Registration Department is in the process of updating the paper admissions application to remove the "single parent" question along with other student status questions. The form will also be updated to include the approved non-discrimination statement. The revised application will be uploaded to the | Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010 | 1/20 | 6/19/20 | Application form submitted. Question removed. |

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| | | college website by December 31, 2019. | | | | |
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Required Action:

The college should remove any questions relating to a student's marital, parental and/or disability status from admission forms and applications.

(ix) Disabled & Employment Limitation:

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|----------------------|------------------------|-------------|------------------|-------------------|
| D.iii | The investigation did not reveal any evidence of a violation. | | | | | |

(x) LEP & Benefit Limitation:

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|----------------------|------------------------|-------------|------------------|-------------------|
| D.iv | The investigation did not reveal any evidence of a violation. | | | | | |

(xi) Preadmission Tests:

Postsecondary admission's tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.v | The investigation did not reveal any evidence of a violation. | | | | | |

(xii) Disability Inquiries:

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.vi | The investigation did not reveal any evidence of a violation. | | | | | |

E STUDENT FINANCIAL ASSISTANCE

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination to access to total scholarships on the basis of sex, race, national origin, or disability.

(v) Financial Assistance Availability:

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.i | The investigation did not reveal any evidence of a violation. | | | | | |

(vi) Sex Restricted Awards:

Sex restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.ii | The investigation did not reveal any evidence of a violation. | | | | | |

(vii) Equitable Financial Aid Information:

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|--|---|--------------------|-------------------------|--|
| E.iii | Non-Compliance: The review of financial aid information and materials distributed by the college and on the college's website appeared to be equitably written without any indication of bias. However review of these | The approved non-discrimination statement has been included on the following BBCC financial aid forms: 2019-20 VI-Standard Verification, | Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010 | 2/20 | Dec 2020 | Forms on line and sent were reviewed and found to have the required non- |

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| | documents found none included a non-discrimination notice. | <p>2019-20 V4-Custom Verification, and the 2019-20 V5-Aggregate Verification. A link to the revised forms is included below.</p> <p>https://www.bigbend.edu/admissions/financial-aid/forms/</p> <p>The college is in the process of updating the Satisfactory Academic Progress Appeal from and the Maximum Timeframe Appeal form with the approved non-discrimination statement. These new forms will be uploaded to the BBCC website by January 31, 2020.</p> | | | | discrimination statement |
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Required Action:

In accordance with the Title IX and Section 504 regulations, 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. In addition, recipients should post a non-discrimination statement on the college’s main webpage in an easily accessible location.

To meet these requirements, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts.

(viii) LEP Financial Aid Information:

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|--|---|--------------------|-------------------------|--|
| E.iv | <p>Non-Compliance: The college has a significant population of community member who are native Spanish speakers. The review found the college does not have any financial aid forms and information available in Spanish for this population.</p> | <p>The college is in the process of selecting a vendor to provide written translation services. Sample documents have been translated by 6 vendors. A committee will review the translations and make a decision regarding vendor selection by November 11, 2019.</p> <p>Once selected, financial aid forms will be translated to Spanish and made available in our community.</p> | <p>Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010</p> | 9/20 | 6/19/20 | <p>Provided form in Spanish with information on applying for financial aid and FERPA information</p> |

Required Action:

The college should take steps to translate financial aid forms and information to Spanish, starting with the most basic and commonly used forms. In addition, the college must take steps to ensure financial aid information is available to all community members who are not native English speakers.

F COUNSELING AND PREVOCATIONAL PROGRAMS

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

(v) Counseling Materials & Activities:

Recipients must ensure that counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.i | The investigation did not reveal any evidence of a violation. | | | | | |

(vi) Directing or Profiling:

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular field or program or measure or predict a student’s prospects for success in any career or program, based upon the student’s race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.ii | The investigation did not reveal any evidence of a violation. | | | | | |

(vii) Directing Toward Restrictive Career:

Recipients may not counsel disabled students toward more restrictive career objectives than non-disabled student with similar abilities and interests.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.iii | The investigation did not reveal any evidence of a violation. | | | | | |

(viii) Disproportionate Enrollment:

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|---|--------------------|-------------------------|---|
| F.iv | Non-Compliance: The college has been unable to meet Perkins performance indicators for Non-Traditional Enrollments and Non-traditional Performance for the last three academic years. In addition, a review of demographics for CTE programs found a very low percent of non-traditional and minority students in some programs. | When BBCC provided data to the Auditor, the Race Code (data warehouse field) was used for the data collection. While correct, it does not provide a complete picture of students who identify as Hispanic, Mexican or other Spanish or Latino. The Race/Ethnicity Code (data warehouse field) does that. The first two | Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010 | 12/20 | Dec 2020 | BBCC performed a review of its counseling and recruitment efforts to ensure the practices do not result in disproportionate enrollment. |

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| | | <p>green tabs in the attached Excel spreadsheet reflect the updated Race/Ethnicity by program.</p> <p>The difference between the Race Code and Race/Ethnicity code for BBCC students is that 16% of BBCC's Hispanic students do not show up in with a Race Code of Hispanic if they also marked a secondary race as other or it is unknown. In the Race/Ethnicity Code they are shown as Hispanic.</p> <p>We believe the attached data provides a more comprehensive view of enrollment in professional/technical programs.</p> <p>BBCC will perform an evaluation of its counseling and recruitment efforts to ensure practices do not result in</p> | | | | <p>The college conducted two surveys that asked how the college could improve Perkins non-traditional enrollments and completions. One survey went out to students and the other survey went to instructors and staff. Staff indicated that the best way to get students into the programs would be through the focused recruiting efforts presenting opportunities specifically to the</p> |
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| | | <p>disproportionate enrollment. This review will include documentation of outreach and recruitment activities to special populations. The college will also review data regarding the reasons students leave BBCC.</p> | | | | <p>underrepresented groups, explaining careers available, and having role models of the underrepresented gender actively engaging recruits and students once they enroll. Student responses indicate the biggest issue with completion was finances and students placed a higher value on FAA certification than did degrees.</p> |
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Required Action:

The college should perform an evaluation of its counseling, and recruitment efforts to ensure none of its practices are resulting in disproportionate enrollment.

G SERVICES FOR STUDENTS WITH DISABILITIES

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

(x) SWD Access to Programs:

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.i | The investigation did not reveal any evidence of a violation. | | | | | |

(xi) Equipment Barriers:

Disabled students must not be excluded from vocational career or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.ii | The investigation did not reveal any evidence of a violation. | | | | | |

(xii) Postsecondary 504 Services:

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete the degree program and/or licensure requirements.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.iii | The investigation did not reveal any evidence of a violation. | | | | | |

(xiii) Services for Students with Disabilities:

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.iv | The investigation did not reveal any evidence of a violation. | | | | | |

(xiv) Evaluation Accommodations & Modifications:

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students aptitude or achievement levels or other relevant factors are measured and not the disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.v | The investigation did not reveal any evidence of a violation. | | | | | |

(xv) Equitable Housing Opportunities:

Students receive equitable opportunities from housing programs regardless of sex, national origin, color, race, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.vi | The investigation did not reveal any evidence of a violation. | | | | | |

(xvi) Comparable & Accessible Housing:

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.vii | The investigation did not reveal any evidence of a violation. | | | | | |

(xvii) Off-Campus Housing:

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their race, sex, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|---------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.viii | Not Applicable – The college does not provide off-campus housing | | | | | |

(xviii) Landlords:

The institution does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.ix | Not Applicable – The college does not cooperate or work with any landlords | | | | | |

H ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities are inaccessible to or unusable by persons with disabilities. Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) — must ensure each program is fully accessible.
- Between 6/4/1977 — 1/17/1991 -- New construction - must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: New construction — must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: New construction and alterations — must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).
- Between 9/15/2010 and 3/15/2012 — may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: New construction — must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

See Attachment A for results of investigation.

J COMPARABLE FACILITIES

Separate changing rooms, showers, and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male and female students should be located in similar proximity to the associated classroom, shops, or laboratories.

See Attachment A for results of investigation.

K WORK STUDY, COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICE TRAINING

An educational institution not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of a student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. The institution should periodically review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(iii) Work Study & Job Placement:

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

| Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
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|-------------------|---|---|---|-------------|----------------|---|
| <p>K.i</p> | <p>Non-Compliance: Currently the college does not offer direct job placement or apprenticeship, but does have work study, externships, and intern opportunities. The college's work study and student employment is managed by the college's financial aid department. The college's financial aid department mostly manages all administrative aspects of hiring, and each individual department screens, selects, and supervises its student employees individually, without input or oversight by the college's HR division. This practice, as well as the rate of turn-over across campus, puts the college and student employees at risk since all employees may not be familiar with recommended and required employment and personnel laws. In addition, without centralized oversight, the college does not have any process to monitor student hiring and placement in these opportunities to ensure no pattern of discrimination is present.</p> | <p>On November 7 and 8, 2019, BBCC will conduct training for supervisors in the selection and screening of student employees and interns. The training will be recorded so that it can be accessed and viewed by those unable to attend or newly hired supervisors.</p> <p>The college will conduct a mandatory training session in January 2020 regarding employment law and human resources policies for supervisors.</p> <p>The hiring process for student employees will be well-documented with access to both students and supervisors. All supervisors making hiring decisions will be required to complete training.</p> <p>All student jobs are posted using the</p> | <p>Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010</p> | <p>9/20</p> | <p>6/19/20</p> | <p>Copy of training that will be provided to those on screening committees and supervising students</p> |
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| | | <p>college's NEOGOV system.</p> <p>Applicant flow data by Ethnicity and Gender will be shared with the Student Employment Office for review and determination if a pattern of discrimination is present. In addition, on an annual basis, the HR Office and the Student Employment Office will meet to review hiring practices for student employees to ensure that no individual practices can be construed as discriminatory.</p> | | | | |
|--|--|---|--|--|--|--|

Required Action:

The college should take steps to ensure all individuals involved in selection, screening and supervision of student employees and interns are aware of applicable employment requirements and human resource laws to ensure opportunities are available to all qualified candidates. In addition, the college should take steps to monitor hiring practices and selections of student employees ensure no patterns of discrimination exist or that any individual practices can be construed as discriminatory.

(iv) Employer Agreements:

A recipient that assists employers or prospective employers in making employment opportunities available to students must ensure the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, and/or pay.

| Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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K.ii The investigation did not reveal any evidence of a violation.

L APPRENTICESHIP TRAINING PROGRAMS

In the same way that an employer may not discriminate and the educational agency may not work with any that discriminate, the educational agency also has the responsibility to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of a student. Written agreements are recommended wherein the apprenticeship program indicates it will not discriminate on these bases. The agency should review apprenticeship assurance forms, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(ii) Apprenticeship Agreements:

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. A written agreement between the institution and the labor union or other sponsor should include an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

| Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|----------------------------|----------------------|------------------------|-------------|------------------|-------------------|
|----------------------------|----------------------|------------------------|-------------|------------------|-------------------|

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| L.i | Not Applicable-The college does not offer any apprenticeship opportunities. | | | | |
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M EMPLOYMENT

Recipients are prohibited from engaging in any employment practices that discriminate against employees or applicants for employment on the basis of sex, disability, race, color, or national origin. These specific prohibitions include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

(v) **Employment Practices:**

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|---|---|--------------------|-------------------------|---|
| M.i | <p>Non-Compliance: The review found no evidence of non-compliance in the general employment practices of the college for faculty and staff. The college has strong policies and procedures designed to ensure that there is no discrimination or appearance of discrimination in general employment. However, the college does not follow these guidelines and practices for students. Student Employment at the college is managed by individual departments without any oversight or guidance from HR. Those supervising student and working with student employees do not receive any training or information on best practices, supervision, and/or civil rights laws. The screening process, questions asked of applicants, and the materials used during the process of selecting student employees are created and used by each individual supervisor and are not reviewed or screened by the college's human resource department, which put both the college and student employees at risk of possible actual or perceived discrimination.</p> | <p>On November 7 and 8, 2019, BBCC will conduct training for supervisors in the selection and screening of student employees and interns. The training will be recorded so that it can be accessed and viewed by those unable to attend or newly hired supervisors.</p> <p>The college will conduct a mandatory training session in January 2020 regarding employment law and human resources policies for supervisors.</p> <p>The hiring process for student employees will be well-documented with access to both students and supervisors. All supervisors making hiring</p> | <p>Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010</p> | <p>9/20</p> | <p>6/19/20</p> | <p>Copy of training that will be provided to those on screening committees and supervising students</p> |

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| | | <p>decisions will be required to complete training.</p> <p>All student jobs are posted using the college's NEOGOV system.</p> <p>Applicant flow data by Ethnicity and Gender will be shared with the Student Employment Office for review and determination if a pattern of discrimination is present within divisions, departments, and/or by supervisor. In addition, on an annual basis, the HR Office and the Student Employment Office will meet to review hiring practices for student employees to ensure that no individual practices can be construed as discriminatory.</p> | | | | |
|--|--|---|--|--|--|--|

Required Action:

The college should consider establishing a more formal process for the screening, selection, and management of student employment and/or take measures to ensure those involved in the process are properly trained. Recommended steps should include training

supervisors of students on prohibited practices, use of standardized applications and interview questions, etc. In addition, the college should monitor student hires by division or supervisor to ensure there are no patterns that could indicate possible discrimination or bias.

(vi) Employment Recruitment Notification:

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| M.ii | The investigation did not reveal any evidence of a violation. | | | | | |

(vii) Salary Scales & Assignments:

An organization should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| M.iii | The investigation did not reveal any evidence of a violation. | | | | | |

(viii) Equal Opportunities & Reasonable Accommodations:

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship and unreasonable.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| <p>M.iv</p> | <p>Non-Compliance: In interviews and communications with college staff, four employees noted that receiving reasonable accommodations for their disability had been a difficult and time consuming task. The employees were from two different departments and had all requested accommodations directly from their supervisor who worked with HR on providing the needed items. One employee stated the delay had been due to a disagreement on which department (the employee's division or HR) should bear the cost of the needed equipment. Other interviewees were unsure of what the delay was caused by. All four employees stated that receiving the accommodations had required persistent reminders and one individual stated they had only received a response after they had threatened to file a complaint.</p> | <p>BBCC will revise the existing reasonable accommodation policy/procedure to include time frames for providing accommodations and notification of the status of the request. Decisions regarding reasonable accommodation will be made by the VP of Human Resources & Labor. Costs for approved accommodations will be borne by the Human Resources Department.</p> | <p>Kim Garza VP of HR kimg@bigben.d.edu 509.793.2010</p> | <p>9/20</p> | | |
|--------------------|---|--|---|-------------|--|--|

Required Action:

The college has a reasonable accommodation policy, however the policy does not establish responsibility for ensuring the accommodation has been provided or provide time frames for providing accommodations. In addition, the policy does not determine who should bear the cost of accommodations. It is recommended the college establish processes designed to ensure employees requesting assistance are aware of the status of their request regularly and to set time frames for the process. It is also recommended the college clarify who has the responsibility for paying needed accommodations and take measures to ensure all requests are managed centrally by an

individual/division with the necessary training and authority to provide accommodations and not by individual supervisors and departments.

| ATTACHMENT A | | | | |
|--------------|----------------------------|------------|-----------------------|-------------|
| 08 | Accessibility | | | |
| | Compliance during visit? | No | | |
| ID | Evidence of Non-Compliance | Resolution | Person(s) Responsible | Target Date |

| | | | | | |
|-------|------------------------------------|---|---|----------------------------|----------|
| S-1 | Tracking Number | ADA0495 | WO #19200560 Adding ADA sign with Van accessible and moving the other sign to correct heights 12 signs have already been adjusted to the correct height around campus | Mike Cooley | 11.1.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Auto Classrooms 4100 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| Notes | One sign missing. One sign at 36". | | | | |
| S-2 | Tracking Number | ADA0496 | WO #19200561 Restripe parking lot to include 2 Handicap and van accessible spots. Adjust heights of signs. | Mike Cooley Tony Bergen | 11.15.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Stall | | | |
| | Parameter | Car and van Widths | | | |
| | Near Building | Comp Science 1500 | | | |

| | | | | | |
|-------|--|---|---|--|---|
| | Non-Compliance | The accessible parking spaces do not comply with the width and access aisle accessibility requirements. | | | |
| | Required Action | Provide accessible parking spaces that comply with the width and access aisle requirements. | | | |
| | Notes | Striping is missing and bottom of signs must be at 60" above grade. | | | |
| S-3 | Tracking Number | ADA0497 | Going out to bid on concrete work to modify the path so that the change in level meets the accessibility requirements. RFP – includes site visit and bids are due 11.1.19 (also see ADA 0505, 0516, 0517, 0522, 0525, and 0529). | Charlene Rios Joe Auvil Outside Contractor | Depends on weather – Dec 1,2019 (if weather holds) if not after the thaw – Feb – March 2020 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Site Access route | | | |
| | Component | Walks / paths | | | |
| | Parameter | Change in level | | | |
| | Near Building | Comp Science 1500 | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | |
| Notes | The ramp at the front entrance must not have transitions greater than 1/2" if there is a beveled edge. Also, the initial 8" of the curb is too steep (11 degree slope). The curb cut must be 1\12 slope max. | | | | |
| S-4 | Tracking Number | ADA0503 | Asphalt work. Will be doing a RFP to overhaul entire parking area. | Charlene Rios Joe Auvil | Will do when less students are |
| | Campus | Main Campus | | | |

| | | | | | |
|-----|--------------------------|--|--|--|---|
| | Location | Site - Main Campus (180A) | RFP – includes site visit and bids are due 11.1.19 | Outside Contractor | being housed – so spring break – March 21-29, 2020 |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Site Access route | | | |
| | Component | Walks / paths | | | |
| | Parameter | Slope | | | |
| | Near Building | Philips Hall 5000-6000 | | | |
| | Non-Compliance | The sidewalk slope is too steep. | | | |
| | Required Action | An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided. | | | |
| | Notes | The damaged asphalt must be repaired along the accessible route. Some slopes as much as 10 degrees. | | | |
| S-5 | Tracking Number | ADA0504 | Asphalt work. Will be doing a RFP to overhaul entire parking area. RFP – includes site visit and bids are due 11.1.19 | Charlene Rios Joe Auvil Outside Contractor | Will do when less students are being housed – so spring break – March 21-29, 2020 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Philips Hall 5000-6000 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| | Notes | Signs must be mounted at 60" above grade to be | | | |

| | | | | | |
|-----------------|---|---|--|--|---|
| | | visible above vehicles. Signs at 48". | | | |
| S-6 | Tracking Number | ADA0505 | Going out to bid on concrete work to modify the path so that the change in level meets the accessibility requirements. RFP – includes site visit and bids are due 11.1.19 (Also see ADA 0497, 0516, 0517, 0522, 0525, and 0529). | Charlene Rios Joe Auvil Outside Contractor | Depends on weather – Dec 1,2019 (if weather holds) if not after the thaw – Feb – March 2020 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Site Access route | | | |
| | Component | Walks / paths | | | |
| | Parameter | Change in level | | | |
| | Near Building | Liberal Arts & Business 1600 | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | |
| Notes | Transition on curb cut greater than 1/2". | | | | |
| S-7 | Tracking Number | ADA0513 | WO #19200367 Restriped the ADA parking spots and moved signs to appropriate height. Also added the signs that were missing. | Mike Cooley Tony Bergen | 9.1.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Student Center/Admin. 1400 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | |

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|-------|--------------------------|--|--|---|--|
| | Notes | The signs need to be raised to 60" above grade. One sign needs to also indicate that the stall is van accessible. One sign is missing. | | | |
| S-8 | Tracking Number | ADA0516 | Going out to bid on concrete work to modify the path so that the change in level meets the accessibility requirements. RFP – includes site visit and bids are due 11.1.19 (Also see ADA 0497, 0505, 0517, 0522, 0525, and 0529). | Charlene Rios Joe Auvil Outside Contractor | Depends on weather – Dec 1, 2019 (if weather holds) if not after the thaw – Feb – March 2020 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Site Access route | | | |
| | Component | Ramps | | | |
| | Parameter | Slope | | | |
| | Near Building | Testing Ctr/Trio Upward Bnd - 1000 | | | |
| | Non-Compliance | The access ramp is too steep. | | | |
| | Required Action | The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches. | | | |
| Notes | Slope is 7 degrees. | | | | |
| S-9 | Tracking Number | ADA0517 | Before adjusting the height of the signs and a van accessible striping – need to complete the concrete RFP to see if the ramp changes the location of the ADA spots. (Also see ADA 0497, 0505, 0516, 0522, 0525, and 0529). | Charlene Rios Tony Bergen Mike Cooley | Depends on weather – Dec 1, 2019 (if weather holds) if not after the thaw – Feb – March 2020 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Testing Ctr/Trio Upward Bnd - 1000 | | | |

| | | | | | |
|-------|---------------------------------|---|---|--------------------------------|----------|
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| | Notes | Move sign up above 60" and add van sign. | | | |
| S-10 | Tracking Number | ADA0518 | WO #19200563 – new signs at the correct height will be adjusted and restriped | Mike Cooley Tony Bergen | 11.15.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Wallenstien Perform. Arts 1100 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| Notes | One must also include van sign. | | | | |
| S-11 | Tracking Number | ADA0519 | WO #19200563 – new signs at the correct height will be adjusted and restriped | Mike Cooley Tony Bergen | 11.15.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Wallenstien Perform. Arts | | | |

| | | | | | |
|------|--------------------------|---|--|--|----------|
| | | 1100 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| | Notes | Signs must be moved up to 60" above grade. One must also include van sign. | | | |
| S-12 | Tracking Number | ADA0520 | Will hit with grinding contractor next round in July 2020. | Charlene Rios Joe Auvil Outside Contractor | 7.15.20 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Site Access route | | | |
| | Component | Walks / paths | | | |
| | Parameter | Change in level | | | |
| | Near Building | Wallenstien Perform. Arts 1100 | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | |
| | Notes | Transition at access isle is 3/4" | | | |
| S-13 | Tracking Number | ADA0524 | WO #19200568 – providing the required accessible parking signs at each accessible parking space. Adjust two signs to appropriate height and include van accessible signs along with the other stalls need signs as well. | Mike Cooley | 11.15.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |

| | | | | | |
|-------|--------------------------|--|--|--|---|
| | Parameter | ADA restricted | | | |
| | Near Building | Science, Engineering, Math - 1200 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| | Notes | Two signs must be raised to 60". Both signs must include van signs. Five other stalls must have signs installed. | | | |
| S-14 | Tracking Number | ADA0525 | Going out to bid on concrete work to modify the path so that the change in level meets the accessibility requirements. RFP – includes site visit and bids are due 11.1.19 (Also see ADA 0497, 0505, 0516, 0517, 0522, and 0529). | Charlene Rios Joe Auvil Outside Contractor | Depends on weather – Dec 1,2019 (if weather holds) if not after the thaw – Feb – March 2020 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Site Access route | | | |
| | Component | Walks / paths | | | |
| | Parameter | Change in level | | | |
| | Near Building | Science, Engineering, Math - 1200 | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | |
| Notes | 3/4" transition. | | | | |
| S-15 | Tracking Number | ADA0529 | Going out to bid on concrete work to modify the path so that the change in level meets the accessibility requirements. RFP – includes site visit and bids are due 11.1.19 | Charlene Rios Joe Auvil Outside Contractor | Depends on weather – Dec 1,2019 (if weather holds) if not after the thaw – Feb |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |

| | | | | | |
|-------|---|---|--|---------------|--------------|
| | Space | Site Access route | (Also see ADA 0497, 0505, 0516, 0517, 0522, and 0525). | | – March 2020 |
| | Component | Walks / paths | | | |
| | Parameter | Change in level | | | |
| | Near Building | Childcare CO-OP I 300A | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | |
| | Notes | Top of ramp has 3/4" transition. | | | |
| S-16 | Tracking Number | ADA0530 | 2018-2019 Minor works project. Resurfaced entire parking lot for building 2000. Slope was corrected and new signs that follow ADA requirements were part of the project. | Charlene Rios | 6.30.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | |
| | Space | Parking | | | |
| | Component | Signs | | | |
| | Parameter | ADA restricted | | | |
| | Near Building | Pe/Comm.Activity Center 2000 | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | |
| Notes | Two signs must be raised to 60". Four stalls must have signs installed. | | | | |
| S-17 | Tracking Number | ADA0531 | 2018-2019 Minor works project. Resurfaced entire parking lot for building 2000. Slope was corrected and new signs | Charlene Rios | 6.30.19 |
| | Campus | Main Campus | | | |
| | Location | Site - Main Campus (180A) | | | |

| | | | | |
|--------------------------------|---|--|--|--|
| Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | that follow ADA requirements were part of the project. | | |
| Space | Site Access route | | | |
| Component | Walks / paths | | | |
| Parameter | Change in level | | | |
| Near Building | Pe/Comm.Activity Center | | | |
| Non- Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | |
| Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | |
| Notes | There are several transitions and cracks along the accessible route from the parking area to the gym that are greater than 1/2". | | | |

ATTACHMENT C
SPOKANE FALLS COMMUNITY
COLLEGE

State Board for Community and Technical Colleges
Civil Rights Compliance Review
Letter of Findings



Spokane Falls Community College
January 30, 2020

FOREWORD

The Methods of Administration (MOA) Coordinator for the State Board for Community and Technical Colleges (SBCTC) performed an on-site review at Spokane Falls Community College (the “college” or SFCC) during the weeks of October April 14 to 18 and November 18 to 22 of 2019. As a recipient of federal financial assistance, Spokane Falls Community College is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) requires each state agency responsible for administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs that receive federal assistance from the U.S. Department of Education. The purpose of the on-site review is to determine the college’s compliance with the guidelines and the following federal laws and regulations:

- Title VI of the *Civil Rights Act of 1964* (Title VI) and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 (Title IX) and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the *Rehabilitation Act of 1973* (Section 504) and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the *Americans with Disabilities Act of 1990* (Title II) and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

While it was not the purpose of this review to assess the college’s compliance with Washington State civil rights laws and regulations, the college should also be aware of these requirements, which are contained in Chapter 49.60 RCW and Title 162 WAC.

Please note that although the resolutions to the items noted in the Letter of Findings (LOF) will complete the college’s obligations in regards to this review, compliance with civil rights requirements is an ongoing obligation requiring continued internal monitoring and effort. Furthermore, the ability of individuals to oppose discriminatory practices and to participate in OCR investigations and other proceedings is critical to ensuring equal educational opportunity in accordance with Federal civil rights laws. For this reason, recipients of Federal funds are prohibited from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Federal civil rights law. Once a student, parent, teacher, coach, or other individual complains formally or informally to a school about a potential civil rights violation or participates in an OCR investigation or proceeding, the recipient is prohibited from retaliating (including intimidating, threatening, coercing, or in any way discriminating against the individual) because of the individual’s complaint or participation.

Spokane Falls Community College was selected for review based on the State of Washington’s 2020-21’s Targeting Plan, which requires review of subrecipients with the highest disparities between their total enrollment and their Career Technical Education (CTE)

enrollment on the basis of race, sex, and disability. The targeting plan also uses other optional rating criteria for selection of colleges to be reviewed. These additional criteria include the length of time since a college was last reviewed, and disparities between total completion rates and CTE completion rates on the basis of race, sex, and disabilities.

This LOF summarizes SBCTC's findings in the following twelve major areas of review:

- Y. Administrative Requirements
- Z. Site Location and Student Eligibility Criteria
- AA. Student Recruitment
- BB. Admissions
- CC. Student Financial Assistance
- DD. Counseling and Prevocational Programs
- EE. Services for Students with Disabilities
- FF. Accessibility
- GG. Comparable Facilities
- HH. Work Study, Cooperative Education, and Job Placement
- II. Apprenticeship Training Programs
- JJ. Employment

This LOF describes any finding of non-compliance for which corrective action is required. *The "Non-Compliance" sections of this letter require a response.* "Recommendations" do not require responses, but are intended to advise the college of ways the educational experience might be made more accessible to students in protected groups.

Please use the Voluntary Compliance Plan (VCP) template attached to provide the college's responses to findings of non-compliance. At a minimum, the VCP should address the following:

- How the college will remedy each item of non-compliance (*Resolution/Work Done* column);
- The identity and contact information for the individual responsible for completing the corrective action plan (*Person Responsible* column); and
- A target completion date (month and year) (*Target Date* Column).

Please note the other two columns are for use by SBCTC's MOA Coordinator when confirming the completion of the required corrective action. Finally, the completed VCP should be signed at the bottom by an individual at the college with sufficient authority to ensure all corrective actions noted are performed as described and by the target dates.

The completed VCP must be returned to SBCTC by March 19, 2020. If the college is unable to meet this deadline, please contact Maryam Jacobs, SBCTC's MOA Coordinator at (360) 704-4389 or [mjacob@sbctc.edu](mailto:mjacobs@sbctc.edu) as soon as possible to discuss an alternate completion date. Once the college's response has been submitted, SBCTC will review the VCP, and

either approve it as is, or will work with the college to ensure that the appropriate corrective action is taken to bring the college into compliance.

In each subsection below, the “Non-compliance” section is followed by the federal regulation citations. In the case of facilities, the regulations in effect at the time of building construction or alteration are cited.

Commendations

- ✓ Spokane Falls Community College is participating in a program called American Dream Academy at Arizona State University. The program is designed to help families gain the tools and resources needed to make sure their students have a successful academic career. Interviewees mentioned that the program has been a great success and has had positive results, especially for first-generation students and those from protected populations.
- ✓ The college is working to encourage diversity and equity in several unique ways. The first is by creation of an Equity Council, composed of staff and faculty which looks at best practices at other institutions and sponsors various events to promote and increase diversity. Another practice adopted by the college is requiring an equity advocate on each interview panel. The advocates are trained employees who are tasked with ensuring the process of selecting candidates for openings is equitable and promotes diversity.
- ✓ The college is one of the few colleges that has been able to successfully manage and monitor its web presence. At many colleges, various departments and offices maintain separate web pages and due to the decentralized nature of higher education, this often leads to conflicting information, omissions, and errors. SFCC has implemented a process requiring all items placed on the website to be approved and reviewed centrally. This step has reduced/eliminated misinformation and poorly designed webpages. In addition, this centralized control also provides assurance that items on-line are ADA accessible.
- ✓ Several of the students interviewed praised the college’s Mosaic Center and stated the Center’s staff are a great resource and support system. Students interviewed mentioned how the Center personnel were always available to assist students and how the department has been a safe place on campus allowing students to voice problems and issues freely and without fear of consequences.
- ✓ Many college employees and students interviewed expressed their appreciation to the college’s Disability Support Services (DSS) staff and the Interim Vice President of Student Affairs. Interviewees stated that these individuals often went above and beyond expectations in providing assistance to other community members and were always supportive, encouraging, and positive. Several employees interviewed commented on how the Interim VP had made follow-up calls in certain circumstances to ensure individuals had received assistance they had asked for, which had made them feel valued and supported. All students interviewed who used the services of DSS expressed their appreciation for how responsive the department personnel were and for the support and service they had received.

Section A-Administrative

Recipients must have certain basic requirements in place to comply with Department of Education's Office of Civil Rights (OCR) Guidelines, Title VI, Title IX, Section 504 and Title II. These basic procedures include the following: an annual public notice; continuous non-discrimination notification; designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II; and a grievance procedure that will allow students an avenue for dealing with alleged discrimination. To verify these, we reviewed numerous documents and electronic material, and conducted interviews with administrators, Title IX and Section 504 coordinators, students, staff and faculty.

A.i - Continuous Notification

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the college that the college does not discriminate on the basis of race, color, national origin, sex, disability or age.

Non-Compliance:

The college's website contains a link at the bottom of the main page called "Equal Opportunity Employer". The link leads the reader to an Equal Opportunity Statement listed under "Public Disclosures." The statement published at this location includes all required information however, the information regarding the coordinators is incorrect. The notice directs readers to a prior coordinator. In addition, on the bottom of this section, a link is available for "Notice of Nondiscrimination in Vocational Education Program". This link also leads the reader to a complete and accurate statement with outdated coordinator information.

A review of 52 printed items and publications found that in most cases, the college is using a complete non-discrimination statement with the correct language and coordinator information. However, the non-discrimination statement is not included or is incomplete in several key documents, to include the paper application for the college, the catalog, the student newspaper, the student handbook and student job applications. In addition, in 13 items reviewed, the college used a condensed or shortened version of the statement that does not include a link to the complete non-discrimination statement.

Criteria:

28 CFR § 35.106 – A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

34 CFR §100.6(d)- Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons

such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §104.8(a) – A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a)... “Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications.”

34 CFR §104.8 (b) – If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

34 CFR §106.9 – (a) Notification of policy. (1) Each recipient shall implement specific and continuing steps to notify applicants for admission and employment, students and parents of elementary and secondary school students, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient, that it does not discriminate on the basis of sex in the educational program or activity which it operates, and that it is required by title IX and this part not to discriminate in such a manner. Such notification shall contain such information, and be made in such manner, as the Assistant Secretary finds necessary to apprise such persons of the protections against discrimination assured them by title IX and this part, but shall state at least that the requirement not to discriminate in the education program or activity extends to employment therein, and to admission thereto unless Subpart C does not apply to the recipient, and that inquiries concerning the application of title IX and this part to such recipient may be referred to the employee designated pursuant to §106.8, or to the Assistant Secretary. (2) Each recipient shall make the initial notification required by paragraph (a)(1) of this section within 90 days of the effective date of this part or of the date this part first applies to such recipient, whichever comes later, which notification shall include publication in: (i) Local newspapers; (ii) Newspapers and magazines operated by such recipient or by student, alumnae, or alumni groups for or in connection with such recipient; and (iii) Memoranda or other written communications distributed to every student and employee of such recipient. (b) Publications. (1) Each recipient shall prominently include a statement of the policy described in paragraph (a) of this section in each announcement, bulletin, catalog, or application form which it makes available to

any person of a type, described in paragraph (a) of this section, or which is otherwise used in connection with the recruitment of students or employees. (2) A recipient shall not use or distribute a publication of the type described in this paragraph which suggests, by text or illustration, that such recipient treats applicants, students, or employees differently on the basis of sex except as such treatment is permitted by this part. (c) Distribution. Each recipient shall distribute without discrimination on the basis of sex each publication described in paragraph (b) of this section, and shall apprise each of its admission and employment recruitment representatives of the policy of nondiscrimination described in paragraph (a) of this section, and require such representatives to adhere to such policy.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscrimination on their main website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, or employees.

The college should rename the notice on its main webpage to “non-discrimination notice”, “equal opportunity institution”, or use other language that indicates the college follows non-discrimination laws in *all* its activities rather than only as an employer, as the current title suggests. In addition, the college should update all the statements on its webpage with information on current coordinators.

In addition, the college should ensure the statement is included in all key documents such as catalogs, handbooks, job applications, and the school newspaper.

Finally, for printed materials, in which the shortened and/or condensed version of the non-discrimination statement is used, a link to the full non-discrimination statement should be included.

A.ii Title IX/Section 504/Title II Coordinators

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use the coordinator’s name for the contact information for printed materials, but it is not necessary. Identification of the coordinator’s title is sufficient for printed materials. For the college’s website, the name of the coordinator(s) must be included.

Non-Compliance:

The college has designated coordinators for Title IX and disability services as required, but has not updated its website to include updated information on these appointed coordinators.

Criteria:

28 CFR §107(a) – Designation of responsible employee.- A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to

comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph.

34 CFR §104.7(a) – Designation of responsible employee. A recipient that employs fifteen or more persons shall designate at least one person to coordinate its efforts to comply with this part.

34 CFR §106.8(a) – Designation of responsible employee. Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions which would be prohibited by this part. The recipient shall notify all its students and employees of the name, office address and telephone number of the employee or employees appointed pursuant to this paragraph.

34 CFR §100 Appendix B IV.O (Guidelines)— Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy on its website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. Inclusion of an email address is encouraged, but not required at this time.

Recommendation:

A member of the college's executive leadership was subject to a Title IX investigation in the last several years, which resulted in major changes in staffing across campus. One of the lasting effects of these incidents is low morale and a lack of trust in leadership and the Human Resource office, which was a regular theme in interviews with college employees. Many interviewees felt the investigation was poorly handled and believed they had been

subjected to retaliation and harassment by Human Resource staff for providing witness testimony in the investigation. It is recommended the college notify all parties involved in these investigations that retaliation against individuals for taking part in “protected activity” is prohibited by federal law and could lead to sanctions and other consequences. In addition, following the investigation, the college hired a private consultant who recommended the college remove the Title IX function from the Human Resources division. The college has followed this recommendation, which has been a positive step to prevent similar incidents in the future, however it is recommended the college consider conflict of interest, and appearance thereof, in all future investigations, and to the extent possible, ensure all matters are investigated by parties that are independent both in actuality and appearance. Furthermore, if Title IX investigation of executive leadership members is performed, it is recommended the college enlist the assistance of an investigator independent of the college and district.

A.iii Annual Public Notification

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members, and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and disabled individuals. A brief summary of the program offerings and admission criteria should be included in the annual announcement, as well as the name, address and telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to ensure that lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Non-Compliance:

Based on information provided and documents reviewed, Spokane Falls did not publish an annual non-discrimination notice at the beginning of the fall term as required.

Criteria:

34 CFR §100.6(d) – Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §100 Appendix B IV.O (Guidelines) – Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national

origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term. This notice must include all required components noted above. The notification should include a brief summary of the college's program offerings, admission criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that will reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. Distribution of the notice on the college's main website is acceptable.

In addition, since the college has acknowledged that its service area includes one or more "communities of national origin minority persons with limited English language skills", it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them.

A.iv Grievance Procedure

A recipient shall adopt and publish grievance procedures to provide for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

The investigation did not reveal any evidence of a violation.

The review found the college has an adopted and published grievance procedure as required.

Section B - Site Location and Student Eligibility Criteria

Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability.

Issues that could result in discrimination or segregation include the selection of certain sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, color, national origin, sex, or disability.

B.i Student Eligibility

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminates on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocation education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

The investigation did not reveal any evidence of a violation.

Per Washington State law, the college has an open enrollment policy and is open to all qualifying individuals, no restrictions to admissions are in place.

B.ii Site Selection and Modifications

Recipients may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin, sex, or disability. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

The investigation did not reveal any evidence of a violation.

The review did not find any evidence that a facility or site could have the effect of excluding, segregating, or otherwise discriminating on the basis of an individual's membership in a protected group.

B.iii Residency

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The college does not have attendance zones and does not exclude students based on geographic boundaries.

Section C - Recruitment

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should include individuals from different races, colors, national origins, sexes, and disabilities.

C.i Recruitment Activities

Recipients must conduct their recruitment activities so as to not exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

The review found no indication of bias or evidence that opportunities were being limited to individuals from any group. However, the college is not conducting any recruitment activities designed to attract students from communities of color, those with limited English proficiency, or special populations.

Criteria:

*34 CFR §100, Appendix B V.C. (Guidelines) – STUDENT RECRUITMENT ACTIVITIES
Recipients must conduct their student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap.
Where recruitment activities involve the presentation or portrayal of vocational and career opportunities, the curricula and programs described should cover a broad range of occupational opportunities and not be limited on the basis of the race, color, national origin, sex, or handicap of the students or potential students to whom the presentation is made. Also, to the extent possible, recruiting teams should include persons of different races, national origins, sexes, and handicaps.*

34 CFR §100, Appendix B IV.O. (Guidelines) – If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

The college should incorporate marketing and recruitment efforts that target communities of color, those communities that are not proficient in English, and other underserved/special populations.

C.ii Recruitment Materials

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disabilities.

The investigation did not reveal any evidence of a violation.

Our review found no evidence that any recruitment material's descriptions of opportunities had the purpose or effect of excluding a protected group.

C.iii Recruitment Teams

To the extent possible, recruiting teams should represent persons of different races, colors, national origins, sexes, and disabilities.

The investigation did not reveal any evidence of a violation.

Although the college's recruitment team is composed of only two white females, the college uses student ambassadors, staff and faculty of various backgrounds and groups to ensure various demographics and those in protected populations are represented.

C.iv Counseling Limited English Proficiency (LEP)/Sensory Impairments

Recipients must ensure that counselors can effectively communicate with individuals with limited English proficiency and sensory impairments.

Non-Compliance:

The college's Student Services staff have access to staff members who are fluent in Spanish, and able to assist students that are native Spanish speakers however, the college has not determined all the languages spoken by the communities in the area and could not demonstrate that its employees can effectively communicate with all communities in the area in their native language. In addition, staff members working in student service areas were not aware of any guidelines on how to effectively communicating with community members that were not proficient in English, when they could not find an informal translator such as a student or a co-worker.

Criteria:

34 CFR §100.3 – (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii)

Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B IV.L (Guidelines) – Recipients may not restrict an applicant’s admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction. Acceptable methods of identification include: (1) Identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary. Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.

34 CFR §100 Appendix B IV.O (Guidelines) – Recipients must insure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

Required Action:

The college should determine the languages spoken in the communities in its service area and take steps to ensure individuals involved in recruitment, counseling, and student services have the necessary tools and resources to communicate effectively with these community members. Finally, the college should establish and distribute guidelines on how employees should communicate with individuals who are not proficient in English. The guidelines should include directions notifying employees when an informal interpreter is not appropriate, and how to access translation and interpretation services.

C.v Promotional Efforts

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration.

The investigation did not reveal any evidence of a violation.

A review of the college's promotional material and recruiting activities did not find any evidence or indication that stereotypes are being perpetuated or that opportunities are being limited based on an individual's membership in a protected group.

C.vi Service Area LEP

If a recipient's service area contains a community with persons of limited English proficiency, information must be available to that community in its native language.

Non-Compliance:

The college acknowledges that it serves various communities that speak languages other than English, but has not determined all languages spoken by these communities and therefore could not demonstrate that these communities were being served. Interviewees all acknowledged that Spanish was a language spoken by a significant number of area residents, however the college does not offer recruitment materials in Spanish.

In addition, interviewees working in the student service area stated that when they worked with students and community members who were not proficient in English, they found a co-worker or student for interpretation, but did not know what to do if an informal interpreter could not be located.

Criteria:

34 CFR §100.3 – (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an

individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B-V.E (Guidelines) -- Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents' night, shop demonstrations, visitation by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups traditionally have not been represented. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

34 CFR §100 Appendix B IV.L (Guidelines) -Recipients may not restrict an applicant's admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction. Acceptable methods of identification include: (1) Identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary. Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.

Required Action:

The college should evaluate what communities of limited English proficiency it currently serves and begin the process of translating recruitment and promotional materials to those languages. In addition, the college should perform periodic assessments of the community it serves to determine if new groups and communities have moved to the area and to determine if materials should be offered in any other languages. Finally, the college should establish and distribute guidelines on how employees should communicate with individuals who are not native English speakers, and instructions to determine when an informal translator is not appropriate, and how to access translation and interpretation services.

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admission criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex, or disability, the criteria should be validated as being essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

D.i Discriminatory Criteria

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as being essential to participation.

Non-Compliance:

Campus community members interviewed stated the college's administration sends out a clear message notifying all community members that discriminatory behavior, to include bullying, inappropriate behavior, and engaging in any activity viewed as discriminatory, will not be tolerated. As proof of this, they mentioned a letter sent by the Chancellor to all students, staff and faculty at the beginning of the term communicating these expectations and the numerous signs and notices on campus.

Despite these efforts, in interviews with employees and students, interviewees stated that they had heard and knew of inappropriate and derogatory racial comments made by staff and faculty. Those interviewed acknowledged that the recent dismissal of a staff member that had made such inappropriate comments indicates that college administration deals with these types of incidents quickly and decisively, but those being interviewed indicated the behavior is still prevalent on campus.

Criteria:

34 CFR §100.3 Discrimination prohibited. – (a) *General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies.* (b) *Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission,*

enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B (Guidelines II-A) – RESPONSIBILITIES OF ALL STATE AGENCY RECIPIENTS -State agency recipients, in addition to complying with all other provisions of the Guidelines relevant to them, may not require, approve of, or engage in any discrimination or denial of services on the basis of race, color, national origin, sex, or handicap in performing any of the following activities: (4) Conducting its own programs. (For example, in employing its staff it may not discriminate on the basis of sex or handicap.)

Required Action:

The college should provide training in diversity to employee, as well as training on how to better communicate and work with individuals from protected and non-traditional populations. Specifically, interviewees recommended training in Multidimensional Diversity, Stage Model, Primary and secondary dimensions of diversity, and the theories of diversity. In addition, interviewees also suggested training on equity in teaching for faculty, who, unknowingly might engage in discriminatory behavior in classrooms. Those interviewed also emphasized the need for executive management and college leadership to participate in this training in order to set the tone on campus and to signify administration's commitment to these principles. In addition, the college should continue practices designed to notify the campus community that inappropriate behavior will not be tolerated.

Recommendation:

- Staff members interviewed also reported inappropriate behavior and comments among staff and faculty targeting employees from minority and protected groups.
- Student interviewees stated some inappropriate comments and behavior came from other students. The interviewees acknowledged the college has made their lack of tolerance for such behavior clear, but stated some students still engaged in inappropriate behavior due to their limited exposure to certain populations. As an example, one student reported being subjected to inappropriate behavior due to her gender identity and another mentioned inappropriate jokes he had heard due to his ethnicity. It is recommended the college also consider diversity training for students.
- In addition to diversity training, some interviewees also recommended the college provide employees with customer service and sensitivity training to better serve the student population.

D.ii Preadmission Inquiries

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

The investigation did not reveal any evidence of a violation.

The review found no indication the college makes preadmission inquiries of a candidate's marital, parental or disability status. In addition, a review of admission policies for various programs, both technical and academic, and interviews with admission staff did not find any indication the college has discriminatory admission criteria.

D.iii Disabled & Employment Limitations

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

The investigation did not reveal any evidence of a violation.

A review of materials and interviews with staff and students found no indication the college denies or limits students with disabilities from participating in any programs or courses.

D.iv LEP & Benefit Limitation

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

The investigation did not reveal any evidence of a violation.

Our review of demographics, interviews with staff, faculty, and students, and review of program descriptions found no indication admission to any vocational program is restricted due to limited English language skills.

D.v Preadmission Tests

Postsecondary admission's tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

The investigation did not reveal any evidence of a violation.

A review of applicable materials and documents, interviews with campus community members, and review of the college's website found all preadmission tests were standard industry tests used for placement. The review found no evidence tests are selected or administered in a way that could be discriminatory.

Recommendation:

A review of admission criteria for several selective entry programs found no violations of civil rights requirements, but did find several admission criteria used for selection of candidates that were not well defined and could cause otherwise eligible candidates to believe they would not qualify for the programs. Examples included criteria for “written communication”, “interpersonal skills”, and questions pertaining to a student’s career goals after graduation. The first two may lead students with certain disabilities such as autism, or individuals who are not native English speakers to believe they may not qualify for the program and the third requirement may lead some students to believe they could not participate in the programs due to limitations in employment opportunities.

It is recommended the college review these requirements to ensure they are essential to the education component for these programs and, when possible, to provide more concrete measures of the skills needed.

D.vi Disability Inquiries

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

The investigation did not reveal any evidence of a violation.

Review of admission forms, interviews with staff, students, and faculty, as well as the college’s Director of Access Services, found no evidence the college is making preadmission inquiries regarding disabilities.

Section E - Student Financial Assistance

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College’s nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequest, or similar legal instrument or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, national origin, or disability.

E.i Financial Assistance Availability

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

The investigation did not reveal any evidence of a violation.

Interviews with staff and students, and review of documentation and demographic information found no indication financial assistance isn't distributed equitably to all students.

Recommendation:

- In a significant number of interviews with students and staff, interviewees stated that due to staff shortages, getting financial aid assistance was difficult and time consuming. One student stated that on one occasion they had waited three hours for an appointment with a staff member and others mentioned having difficulties getting an appointment with someone from financial aid. Financial Aid staff interviewed confirmed the department is extremely short staffed and stated the office has been forced to decrease its office hours to provide staff time to process and complete paperwork. Since lack of support services, including financial aid counseling, effects special populations, minority groups, and non-traditional students disproportionately, it is recommended the college consider exploring avenues to ensure students receive the services they require in a more timely manner.
- Students interviewed stated that getting information on scholarships available was difficult and lacked transparency.

To better serve students interested in applying for scholarships, the college maintains a database of all awards and scholarships available. Interested students provide staff with certain information about themselves and the system matches students with eligible scholarships. Due to this system, the college does not provide information on Individual scholarships and does not advertise for specific awards. It is recommended the college consider providing more information on how to apply for scholarships to students through orientation and other tools, and to consider sharing some information on the types of scholarships available.

E.ii Sex-Restricted Awards

Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument.

The investigation did not reveal any evidence of a violation.

The review found that the college, with assistance from its foundation, currently offers 133 scholarships of which only 5 are restricted by sex to females. We requested support records for a sample of three of the sex restricted scholarships and found the awards to have been per request and will of third-party donors.

A review of scholarships available to the college's students found three in which preference is given to females, however all these awards are administered by the College's foundation and not the college and do not appear to have the effect of overall discrimination on the basis of sex.

E.iii Equitable Financial Aid Information

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

Non-Compliance:

The review of financial aid information and materials distributed by the college and on the college's website appear to be equitably written without any indication of bias however, the review found the majority of the material and forms providing information and used by the department did not include a non-discrimination notice.

Criteria:

34 CFR §100.3(a-b) – (a) *General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited: (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.*

34 CFR §100 Appendix B (Guidelines VI-B) – *Student Financial Assistance- Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains*

a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

34 CFR §104(a) and (b) – (a) *General. No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service.*

34 CFR §104.46 – (a) *Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.*

34 CFR §106.37 – (a) *General. Except as provided in paragraphs (b) and (c) of this section, in providing financial assistance to any of its students, a recipient shall not: (1) On the basis of sex, provide different amount or types of such assistance, limit eligibility for such assistance which is of any particular type or source, apply different criteria, or otherwise discriminate; (2) Through solicitation, listing, approval, provision of facilities or other services, assist any foundation, trust, agency, organization, or person which provides assistance to any of such recipient's students in a manner which discriminates on the basis of sex; or (3) Apply any rule or assist in application of any rule concerning eligibility for such assistance which treats persons of one sex differently from persons of the other sex with regard to marital or parental status.* (b) *Financial aid established by certain legal instruments. (1) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign wills, trusts, bequests, or similar legal instruments or by acts of a foreign government which requires that awards be made to members of a particular sex specified therein; Provided, That the overall effect of the award of such sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex. (2) To ensure nondiscriminatory awards of assistance as required in paragraph (b)(1) of this section, recipients shall develop and use procedures under which: (i) Students are selected for award of financial assistance on the basis of nondiscriminatory criteria and not on the basis of availability of funds restricted to members of a particular sex; (ii) An appropriate sex-restricted scholarship, fellowship, or other form of financial assistance is allocated to each student selected under paragraph (b)(2)(i) of this section; and (iii) No student is denied the award for which he or she was selected under paragraph (b)(2)(i) of this section because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex.* (c) *Athletic scholarships. (1) To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics. (2) Separate athletic scholarships or grants-in-aid for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with this paragraph and §106.41.*

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials, to include all financial aid forms and informational pamphlets made available to participants, students, applicants, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at:

<http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. This statement

should be included on all financial aid materials distributed to students and community members.

E.iv LEP Financial Aid Information

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

Non-Compliance

The college has acknowledged it serves communities of with limited English language skills however, none of the financial aid forms or informational brochures are available in these languages. In addition, department staff members did not have set procedures to serve students who were not proficient in English if they were unable to find a co-worker or student for interpretation.

Criteria:

34 CFR 100.3(a-b) – (a) **General.** No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) **Specific discriminatory actions prohibited:** (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §104(a-b) – (a) **General.** No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) **Discriminatory actions prohibited.** (1) A

recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service.

34 CFR 100 Appendix B (Guidelines VI-B) -- Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

34 CFR §104.46 – (a) Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such

employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.

34 CFR §106.37 – (a) General. Except as provided in paragraphs (b) and (c) of this section, in providing financial assistance to any of its students, a recipient shall not: (1) On the basis of sex, provide different amount or types of such assistance, limit eligibility for such assistance which is of any particular type or source, apply different criteria, or otherwise discriminate; (2) Through solicitation, listing, approval, provision of facilities or other services, assist any foundation, trust, agency, organization, or person which provides assistance to any of such recipient's students in a manner which discriminates on the basis of sex; or (3) Apply any rule or assist in application of any rule concerning eligibility for such assistance which treats persons of one sex differently from persons of the other sex with regard to marital or parental status. (b) Financial aid established by certain legal instruments. (1) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign wills, trusts, bequests, or similar legal instruments or by acts of a foreign government which requires that awards be made to members of a particular sex specified therein; Provided, That the overall effect of the award of such sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex. (2) To ensure nondiscriminatory awards of assistance as required in paragraph (b)(1) of this section, recipients shall develop and use procedures under which: (i) Students are selected for award of financial assistance on the basis of nondiscriminatory criteria and not on the basis of availability of funds restricted to members of a particular sex; (ii) An appropriate sex-restricted scholarship, fellowship, or other form of financial assistance is allocated to each student selected under paragraph (b)(2)(i) of this section; and (iii) No student is denied the award for which he or she was selected under paragraph (b)(2)(i) of this section because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex. (c) Athletic scholarships. (1) To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics. (2) Separate athletic scholarships or grants-in-aid for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with this paragraph and §106.41.

Required Action:

The college should adopt a method to determine what communities of individuals with limited English language skills it serves and make financial aid information and forms available in those languages. In addition, the college should periodically reassess its community to determine if there are changes in the demographics to ensure financial aid information is available to all community members who are not native English speakers. Finally, the college should establish and distribute guidelines on how staff should communicate with individuals with limited English proficiency, to include instructions on

when an official versus an informal interpreter is appropriate, and how to access translation and interpretation services when required.

Section F – Counseling and Pre-Vocational Programs

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

F.i Counseling Materials & Activities

Recipients must ensure their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

A review of the college’s promotional and recruiting materials, and a review of policies and procedures, found no indication of discrimination in counseling materials however, interviews with students, staff and faculty found that the college has a severe shortage of qualified counselors which disproportionately effects students from protected groups, non-traditional students, and individuals from minority populations.

The shortage and need for additional counseling services was mentioned as an issue by almost every individual interviewed and was especially concerning for the counseling staff who did not have the time or capacity to provide the quality and amount of services they believed were necessary to help students succeed. The counselors stated the limitations in their ability to serve students was disproportionately affecting non-traditional and first-generation students, as well as those from various protected groups. Interviews with students, found the shortage has resulted in students taking unneeded classes, taking repeated placement tests, and other issues. Student interviewees complained about the long waiting periods and receiving incorrect and conflicting information from untrained staff providing informal counseling services. Since the college requires new students to receive academic counseling, this shortage has also created a bottle neck at certain times and has been a source of frustration for both students and staff.

Due to this shortage, some of the college’s faculty have taken on counseling, but due to their lack of training in many areas, this has increased frustration for some students. Several students interviewed stated they had received incorrect information from their first faculty advisor, but once they found a faculty member in their specific program, they had received more timely and correct information.

Criteria:

28 CFR 35.130 - General prohibitions against discrimination – (a) No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity. (b)(1) A public entity, in providing any aid, benefit,

or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of disability— (i) Deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified individual with a disability an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified individual with a disability with an aid, benefit, or service that is not as effective in affording equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as that provided to others; (iv) Provide different or separate aids, benefits, or services to individuals with disabilities or to any class of individuals with disabilities than is provided to others unless such action is necessary to provide qualified individuals with disabilities with aids, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified individual with a disability by providing significant assistance to an agency, organization, or person that discriminates on the basis of disability in providing any aid, benefit, or service to beneficiaries of the public entity's program;

(vii) Otherwise limit a qualified individual with a disability in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving the aid, benefit, or service. (2) A public entity may not deny a qualified individual with a disability the opportunity to participate in services, programs, or activities that are not separate or different, despite the existence of permissibly separate or different programs or activities. (3) A public entity may not, directly or through contractual or other arrangements, utilize criteria or methods of administration: (i) That have the effect of subjecting qualified individuals with disabilities to discrimination on the basis of disability; (ii) That have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the public entity's program with respect to individuals with disabilities; or (iii) That perpetuate the discrimination of another public entity if both public entities are subject to common administrative control or are agencies of the same State.

34 CFR 106.36 Counseling and use of appraisal and counseling materials – (a) Counseling. A recipient shall not discriminate against any person on the basis of sex in the counseling or guidance of students or applicants for admission.

34 CFR 104.4 Discrimination prohibited. – (b) Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (2) For purposes of this part, aids, benefits, and services, to be equally effective, are not required to produce the identical result or level of achievement for handicapped and nonhandicapped persons, but must afford handicapped persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs. (4) A recipient may not, directly or through contractual or other arrangements, utilize criteria or methods of administration (i) that have the effect of subjecting qualified handicapped persons to discrimination on the basis of handicap, (ii) that have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the recipient's program or activity with respect to handicapped persons, or (iii) that perpetuate the discrimination of another recipient if both recipients are subject to common administrative control or are agencies of the same State.

34 CFR 100 Appendix B (Guidelines V-A) -- Counseling and Prevocational Programs -
A. RECIPIENT RESPONSIBILITIES- Recipients must insure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or handicap. **B. COUNSELING AND PROSPECTS FOR SUCCESS -** Recipients that operate vocational education programs must insure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program based upon the student's race, color, national origin, sex, or handicap. Recipients may not counsel handicapped students toward more restrictive career objectives than nonhandicapped students with similar abilities and interests. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or handicapped students, recipients must take steps to ensure that the disproportion does not result from unlawful discrimination in counseling activities.

Required Action:

The college should take measures to increase counseling services on campus and to ensure all those providing services are properly trained.

Recommendation:

Students and employees interviewed suggested the college consider making orientation and academic counseling mandatory for all students. They pointed out that individuals returning to school after an extended period of time and transfer students from other institutions often needed the information provided at these sessions. In addition, interviewees stated knowing the campus and having basic information was helpful in making students feel more included and confident.

F.ii Directing or Profiling

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

A review of program requirements for various programs, statistical information, and interviews with staff and students, found no indication students were being profiled or directed/steered to certain courses or programs.

F.iii Directing Toward Restrictive Career

Recipients may not counsel disabled students toward more restrictive career objectives than nondisabled students with similar abilities and interests.

The investigation did not reveal any evidence of a violation.

A review of various program requirements, interviews with staff and students, and review of enrollment statistics found no indication disabled students were being directed towards more restrictive careers.

F.iv Disproportionate Enrollment

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

Non-Compliance:

The review found the college’s population of Hispanic/Latino, Asian, and Native American/Pacific Islander students, as well as individuals with a disability, was significantly below average when compared to demographics of the surrounding population. The comparison of college and area demographics are as follows:

| | Total Students (All) | | Total Students (CTE) | | Spokane (City) ¹ | Spokane County ² | Washington State ³ | Minimum Acceptable Range: | SFCC Total | SFCC CTE |
|---|----------------------|----------|----------------------|----------|-----------------------------|-----------------------------|-------------------------------|---------------------------|------------|----------|
| | Total AY1819 | % of Cat | Total AY1819 | % of Cat | | | | | | |
| Students | | | | | | | | | | |
| All | 22,901 | | 3,214 | | 219,190 | 514,631 | 7,535,591 | | | |
| Men | 7,904 | 34.5% | 1,016 | 31.6% | 48.7% | 49.6% | 50.0% | | | |
| Women | 12,627 | 55.1% | 1,842 | 57.3% | 51.3% | 50.4% | 50.0% | 50.0% | 55.14% | 57.3% |
| Asian | 820 | 3.6% | 63 | 2.0% | 2.8% | 2.4% | 9.3% | 2.4% | 3.58% | 2.0% |
| Hispanic/Latino | 905 | 4.0% | 118 | 3.7% | 6.2% | 5.9% | 12.9% | 5.9% | 3.95% | 3.7% |
| African American | 664 | 2.9% | 86 | 2.7% | 2.3% | 2.0% | 4.3% | 2.0% | 2.90% | 2.7% |
| Native American and Pacific Islander | 112 | 0.5% | 15 | 0.5% | 2.6% | 2.4% | 2.7% | 2.4% | 0.49% | 0.5% |

| | | | | | | | | | | |
|-------------------|-------|------|-----|-------|-------|-------|------|------|-------|-------|
| Two or More | 2,068 | 9.0% | 327 | 10.2% | 5.8% | 4.1% | 4.8% | 4.1% | 9.03% | 10.2% |
| Disabled Under 65 | 1,616 | 7.1% | 308 | 9.6% | 12.4% | 10.9% | 9.0% | 9.0% | 7.1% | 9.6% |

Criteria:

34 CFR §100 Appendix B IV.K (Guidelines) - K. ELIGIBILITY BASED ON EVALUATION OF EACH APPLICANT UNDER ADMISSIONS CRITERIA – Recipients may not judge candidates for admission to vocational education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or handicap. However, if a recipient can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory.

34 CFR §100 Appendix B V.B (Guidelines) – B. COUNSELING AND PROSPECTS FOR SUCCESS –Recipients that operate vocational education programs must insure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student’s prospects for success in any career or program based upon the student’s race, color, national origin, sex, or handicap. Recipients may not counsel handicapped students toward more restrictive career objectives than nonhandicapped students with similar abilities and interests. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or handicapped students, recipients must take steps to insure that the disproportion does not result from unlawful discrimination in counseling activities.

Required Action:

It is recommended the college examine its recruitment, enrollment, and marketing practices, as well as its student service and academic programs, to ensure they are not causing or contributing to this disproportionality.

Section G - Services for Students with Disabilities (SWD)

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

G.i SWD Access to Programs

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

The investigation did not reveal any evidence of a violation.

Interviews with the campus community, including the college's Accessibility Coordinator and students, found no indication any qualified person has been denied access or subjected to discrimination.

G.ii Equipment Barriers

Disabled students must not be excluded from vocational, career, or academic programs, courses, services or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

The investigation did not reveal any evidence of a violation.

A review of equipment, tools and resources found the college maintains a large supply of resources and tools to assist students with disabilities. Interviews with staff and students and review of various materials found no indication that disabled students were excluded or discouraged from participation in activities or services due to equipment barriers or lack of services.

G.iii Postsecondary 504 Services

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete the degree program and/or licensure requirements.

The investigation did not reveal any evidence of a violation.

The review found no indication of discrimination in academic programs. Interviews and review of documents found the college is taking appropriate measures to ensure participants have required modifications and adjustments to complete programs.

G.iv Academic Adjustment

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

The investigation did not reveal any evidence of a violation.

The review found the college is making necessary adjustments to meet the needs of students with disabilities.

G.v Evaluation Accommodations & Modifications

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes, achievement levels, or other relevant factors are measured, not the disability.

The investigation did not reveal any evidence of a violation.

A review of academic programs and requirements, as well as interviews with staff and students, found no indication course examinations or evaluations are administered in a manner designed to or with the effect of discriminating against those with disabilities.

G.vi Equitable Housing Opportunities

Students receive equitable opportunities to benefit from housing programs regardless of their sex, national origin, color, race, or disability.

Not Applicable

The college does not have dormitories and does not provide housing.

G.vii Comparable & Accessible Housing

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

Not Applicable

The college does not have dormitories and does not provide housing.

G.viii Off-Campus Housing

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their sex, race, color, national origin or disability.

Not Applicable

The College does not provide off-campus housing services to students.

G.ix Landlords

The college does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

Not Applicable

The college does not work with or refer students to any landlords.

Section H – Accessibility

Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) – must ensure each program is fully accessible.
- Between 6/4/1977 and 1/17/1991 – New construction - must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: New construction – must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: New construction and alterations – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).
- Between 9/15/2010 and 3/15/2012 – may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: New construction – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

Section H is provided at the end of this document in Attachment A

Section J – Comparable Facilities

Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male and female students should be located in similar proximity to the associated classrooms, shops or laboratories.

Section J is provided at the end of this document in Attachment A

Section K – Work Study Cooperative Education, Job Placement, and Apprenticeship Training

An educational institution not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of a student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. The institution should periodically review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

K.i Work Study & Job Placement

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review did not find any indication of bias or discrimination in the work study, cooperative education, and job placement programs.

Recommendation:

- In interviews with both students and employees, the process for hiring students for work-study was a common source of frustration. Several employees expressed frustration that although they needed student workers, they were unable to hire them, and students stated they wanted to work and needed the money, but couldn't be hired.

Our interview with personnel overseeing the program revealed the college had not yet received funding required for the program. It is recommended the college consider finding a way to communicate these circumstances to the campus community and provide updates to reduce the frustration of employees and students.

- Another issue raised by student interviewees was the rules relating to the Work Study program applicable to student employees. The student interviewees reported the program has very stringent rules concerning student timesheets and a student was dismissed after three errors on pay records, regardless of circumstances. Interviews with staff members in charge of the Work Study program revealed the rules relating to these administrative functions was due to both stringent federal requirements pertaining to pay documents, and the number of students working under the award. These students requested the college reconsider these rules and consider allowing students the opportunity to appeal dismissals under certain circumstances.

K.ii Employer Agreements

A recipient that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, or pay.

The investigation did not reveal any evidence of a violation.

A review of a template for sample agreements used by the college and outside employers providing students with opportunities found the agreement contains the required language ensuring non-discrimination by the employer.

Section L - Apprentice Training Program

Colleges have the responsibility to take steps to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. Although not required, the college should consider having a written agreement whereby the apprenticeship program indicates it will not discriminate on these bases. The college should periodically review apprenticeship assurance forms or agreements, and the assignment of students presently in such programs to see whether any such patterns exist.

L.i Apprenticeship Agreements

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. A written agreement between the institution and the labor union or other sponsor should include an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

Not Applicable

The college does not offer any apprenticeship opportunities.

Section M - Employment

Colleges are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and candidate selection matters, salary establishment reasonable accommodation, and practices designed to overcome the effects of past discrimination.

M.i Employment Practices

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

The review found no evidence of non-compliance in the general employment practices of the college for faculty and staff. The college has policies and procedures in place to ensure that there is no discrimination or appearance of discrimination in general employment. However, the college does not follow these guidelines and practices for students. Student employment at the college is managed by individual departments without any oversight or guidance from HR. Those supervising student employees and working with students do not receive any training or information on best practices, supervision, and/or civil rights laws. The screening process, questions asked of applicants, and the materials used during the process of selecting student candidates is created by individual supervisors and is not reviewed or screened by the college's human resource department, which put both the college and student employees at risk of possible actual or perceived discrimination.

Criteria:

34 CFR §100.3(c) – Where a primary objective of the Federal financial assistance to a program to which this regulation applies is to provide employment, a recipient may not (directly or through contractual or other arrangements) subject an individual to discrimination on the ground of race, color, or national origin in its employment practices under such program (including recruitment or recruitment advertising, employment, layoff or termination, upgrading, demotion, or transfer, rates of pay or other forms of compensation, and use of facilities), including programs where a primary objective of the Federal financial assistance is (i) to reduce the employment of such individuals or to help them through employment to meet subsistence needs, (ii) to assist such individuals through employment to meet expenses incident to the commencement or continuation of their education or training, (iii) to provide work experience which contributes to the education or training of such individuals, or (iv) to provide remunerative activity to such individuals who because of handicaps cannot be readily absorbed in the competitive labor market.

34 CFR §104.11 – Discrimination prohibited. - (a) General. (1) No qualified handicapped person shall, on the basis of handicap, be subjected to discrimination in employment under any program or activity to which this part applies. (2) A recipient that receives assistance under the Education of the Handicapped Act shall take positive steps to employ and advance in employment qualified handicapped persons in programs or activities assisted under that Act. (3) A recipient shall make all decisions concerning employment under any program or activity to which this part applies in a manner which ensures that discrimination on the basis of handicap does not occur and may not limit, segregate, or classify applicants or employees in any way that adversely affects their opportunities or status because of handicap. (4) A recipient may not participate in a contractual or other relationship that has the effect of subjecting qualified handicapped applicants or employees to discrimination prohibited by this subpart. The relationships referred to in this paragraph include

relationships with employment and referral agencies, with labor unions, with organizations providing or administering fringe benefits to employees of the recipient, and with organizations providing training and apprenticeships. (b) Specific activities. The provisions of this subpart apply to: (1) Recruitment, advertising, and the processing of applications for employment; (2) Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff and rehiring; (3) Rates of pay or any other form of compensation and changes in compensation; (4) Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists; (5) Leaves of absence, sick leave, or any other leave; (6) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (7) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, and selection for leaves of absence to pursue training; (8) Employer sponsored activities, including those that are social or recreational; and (9) Any other term, condition, or privilege of employment. (c) A recipient's obligation to comply with this subpart is not affected by any inconsistent term of any collective bargaining agreement to which it is a party.

34 CFR §104.13 – Employment criteria. - (a) A recipient may not make use of any employment test or other selection criterion that screens out or tends to screen out handicapped persons or any class of handicapped persons unless: (1) The test score or other selection criterion, as used by the recipient, is shown to be job-related for the position in question, and (2) Alternative job-related tests or criteria that do not screen out or tend to screen out as many handicapped persons are not shown by the Director to be available. (b) A recipient shall select and administer tests concerning employment so as best to ensure that, when administered to an applicant or employee who has a handicap that impairs sensory, manual, or speaking skills, the test results accurately reflect the applicant's or employee's job skills, aptitude, or whatever other factor the test purports to measure, rather than reflecting the applicant's or employee's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure).

34 CFR §104.14 – Preemployment inquiries. (a) Except as provided in paragraphs (b) and (c) of this section, a recipient may not conduct a preemployment medical examination or may not make preemployment inquiry of an applicant as to whether the applicant is a handicapped person or as to the nature or severity of a handicap. A recipient may, however, make preemployment inquiry into an applicant's ability to perform job-related functions. (b) When a recipient is taking remedial action to correct the effects of past discrimination pursuant to 104.6 (a), when a recipient is taking voluntary action to overcome the effects of conditions that resulted in limited participation in its federally assisted program or activity pursuant to 104.6(b), or when a recipient is taking affirmative action pursuant to section 503 of the Act, the recipient may invite applicants for employment to indicate whether and to what extent they are handicapped, Provided, That: (1) The recipient states clearly on any written questionnaire used for this purpose or makes clear orally if no written questionnaire is used that the information requested is intended for use solely in connection with its remedial action obligations or its voluntary or affirmative action efforts; and (2) The recipient states clearly that the information is being requested on a voluntary basis, that it will be kept confidential as provided in paragraph (d) of this

section, that refusal to provide it will not subject the applicant or employee to any adverse treatment, and that it will be used only in accordance with this part. (c) Nothing in this section shall prohibit a recipient from conditioning an offer of employment on the results of a medical examination conducted prior to the employee's entrance on duty, Provided, That: (1) All entering employees are subjected to such an examination regardless of handicap, and (2) The results of such an examination are used only in accordance with the requirements of this part. (d) Information obtained in accordance with this section as to the medical condition or history of the applicant shall be collected and maintained on separate forms that shall be accorded confidentiality as medical records, except that: (1) Supervisors and managers may be informed regarding restrictions on the work or duties of handicapped persons and regarding necessary accommodations; (2) First aid and safety personnel may be informed, where appropriate, if the condition might require emergency treatment; and (3) Government officials investigating compliance with the Act shall be provided relevant information upon request.

34 CFR §106.51 – (a) General. (1) No person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in employment, or recruitment, consideration, or selection therefor, whether full-time or part-time, under any education program or activity operated by a recipient which receives Federal financial assistance. (2) A recipient shall make all employment decisions in any education program or activity operated by such recipient in a nondiscriminatory manner and shall not limit, segregate, or classify applicants or employees in any way which could adversely affect any applicant's or employee's employment opportunities or status because of sex. (3) A recipient shall not enter into any contractual or other relationship which directly or indirectly has the effect of subjecting employees or students to discrimination prohibited by this subpart, including relationships with employment and referral agencies, with labor unions, and with organizations providing or administering fringe benefits to employees of the recipient. (4) A recipient shall not grant preferences to applicants for employment on the basis of attendance at any educational institution or entity which admits as students only or predominantly members of one sex, if the giving of such preferences has the effect of discriminating on the basis of sex in violation of this part. (b) Application. The provisions of this subpart apply to: (1) Recruitment, advertising, and the process of application for employment; (2) Hiring, upgrading, promotion, consideration for and award of tenure, demotion, transfer, layoff, termination, application of nepotism policies, right of return from layoff, and rehiring; (3) Rates of pay or any other form of compensation, and changes in compensation; (4) Job assignments, classifications and structure, including position descriptions, lines of progression, and seniority lists; (5) The terms of any collective bargaining agreement; (6) Granting and return from leaves of absence, leave for pregnancy, childbirth, false pregnancy, termination of pregnancy, leave for persons of either sex to care for children or dependents, or any other leave; (7) Fringe benefits available by virtue of employment, whether or not administered by the recipient; (8) Selection and financial support for training, including apprenticeship, professional meetings, conferences, and other related activities, selection for tuition assistance, selection for sabbaticals and leaves of absence to pursue training; (9) Employer-sponsored activities, including those that are social or recreational; and (10) Any other term, condition, or privilege of employment.

34 CFR §106.52 - *Employment criteria* – A recipient shall not administer or operate any test or other criterion for any employment opportunity which has a disproportionately adverse effect on persons on the basis of sex unless: (a) Use of such test or other criterion is shown to predict validly successful performance in the position in question; and (b) Alternative tests or criteria for such purpose, which do not have such disproportionately adverse effect, are shown to be unavailable.

34 CFR §106.53 – *Recruitment* – (a) *Nondiscriminatory recruitment and hiring*. A recipient shall not discriminate on the basis of sex in the recruitment and hiring of employees. Where a recipient has been found to be presently discriminating on the basis of sex in the recruitment or hiring of employees, or has been found to have in the past so discriminated, the recipient shall recruit members of the sex so discriminated against so as to overcome the effects of such past or present discrimination. (b) *Recruitment patterns*. A recipient shall not recruit primarily or exclusively at entities which furnish as applicants only or predominantly members of one sex if such actions have the effect of discriminating on the basis of sex in violation of this subpart.

34 CFR 106.57 – **Marital or parental status** – (a) *General*. A recipient shall not apply any policy or take any employment action: (1) Concerning the potential marital, parental, or family status of an employee or applicant for employment which treats persons differently on the basis of sex; or (2) Which is based upon whether an employee or applicant for employment is the head of household or principal wage earner in such employee's or applicant's family unit. (b) *Pregnancy*. A recipient shall not discriminate against or exclude from employment any employee or applicant for employment on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom. (c) *Pregnancy as a temporary disability*. A recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom and any temporary disability resulting therefrom as any other temporary disability for all job related purposes, including commencement, duration and extensions of leave, payment of disability income, accrual of seniority and any other benefit or service, and reinstatement, and under any fringe benefit offered to employees by virtue of employment. (d) *Pregnancy leave*. In the case of a recipient which does not maintain a leave policy for its employees, or in the case of an employee with insufficient leave or accrued employment time to qualify for leave under such a policy, a recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom as a justification for a leave of absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status which she held when the leave began or to a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

34 CFR 106.58 - *Effect of State or local law or other requirements* – (a) *Prohibitory requirements*. The obligation to comply with this subpart is not obviated or alleviated by the existence of any State or local law or other requirement which imposes prohibitions or limits upon employment of members of one sex which are not imposed upon members of the other sex. (b) *Benefits*. A recipient which provides any compensation, service, or benefit to members of one sex pursuant to a State or local

law or other requirement shall provide the same compensation, service, or benefit to members of the other sex.

34 CFR 106.60 — Pre-employment inquiries - (a) Marital status. A recipient shall not make pre-employment inquiry as to the marital status of an applicant for employment, including whether such applicant is “Miss or Mrs.” (b) Sex. A recipient may make pre-employment inquiry as to the sex of an applicant for employment, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part.

34 CFR 106.61 — Sex as a bona-fide occupational qualification. – A recipient may take action otherwise prohibited by this subpart provided it is shown that sex is a bona-fide occupational qualification for that action, such that consideration of sex with regard to such action is essential to successful operation of the employment function concerned. A recipient shall not take action pursuant to this section which is based upon alleged comparative employment characteristics or stereotyped characterizations of one or the other sex, or upon preference based on sex of the recipient, employees, students, or other persons, but nothing contained in this section shall prevent a recipient from considering an employee's sex in relation to employment in a locker room or toilet facility used only by members of one sex.

34 CFR 100 Appendix B (Guidelines VIII-(A)-(F) — A. EMPLOYMENT GENERALLY – Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or handicap. Recipients may not engage in any employment practice that discriminates on the basis of race, color, or national origin if such discrimination tends to result in segregation, exclusion or other discrimination against students. B. RECRUITMENT Recipients may not limit their recruitment for employees to schools, communities, or companies disproportionately composed of persons of a particular race, color, national origin, sex, or handicap except for the purpose of overcoming the effects of past discrimination. Every source of faculty must be notified that the recipient does not discriminate in employment on the basis of race, color, national origin, sex, or handicap. C. PATTERNS OF DISCRIMINATION Whenever the Office for Civil Rights finds that in light of the representation of protected groups in the relevant labor market there is a significant underrepresentation or overrepresentation of protected group persons on the staff of a vocational education school or program, it will presume that the disproportion results from unlawful discrimination. This presumption can be overcome by proof that qualified persons of the particular race, color, national origin, or sex, or that qualified handicapped persons are not in fact available in the relevant labor market. D. SALARY POLICIES Recipients must establish and maintain faculty salary scales and policy based upon the conditions and responsibilities of employment, without regard to race, color, national origin, sex or handicap. E. EMPLOYMENT OPPORTUNITIES FOR HANDICAPPED APPLICANTS Recipients must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question. Recipients must make reasonable accommodation for the physical or mental limitations of handicapped applicants who are otherwise qualified unless recipients can demonstrate that the accommodation would impose an undue hardship. F. THE EFFECTS OF PAST

DISCRIMINATION Recipients must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, or sex, or who are handicapped.

Required Action:

The college should consider establishing a more formal process for the screening, selection, and management of student employees and/or take measures to ensure those involved in the process of screening, selecting and supervising students are properly trained. Recommended steps should include training supervisors of students on prohibited practices, use of standardized applications and interview questions, etc. In addition, the college should consider monitoring student hires by division or supervisor to ensure there are no patterns that could indicate possible discrimination or bias.

Recommendation:

- Nearly every employee interviewed mentioned the low morale and high turn-over on campus and cited this condition as something effecting the quality of services provided to students. Interviewees stated that most of the current issues can be traced back to several title IX investigations and incidents from prior years and the District office's Human Resource division's management of these incidents. The situation was also mentioned by new employees as an issue due, to the high level of turn-over still present on campus. One individual stated that during her short time at the college of less than a year, she has worked with three supervisors, each of which has had different expectations. In addition, the low staffing in various student service departments has exasperated the situation. Interviewees acknowledge that the current administration have taken steps to improve the situation, but reported that these efforts have not always been successful. Interviewees offered the following suggestions to help increase overall morale on campus:
 - Currently the various divisions and departments on campus have very little interaction and the campus community is very siloed. As a result, employees had very little understanding of what others do and the services available on campus. The interviewees suggested more activities designed to allow the campus community to mingle.

M.ii Employment Recruitment Notification

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

A review of the college's employment website and a sample of job openings found all contained required non-discrimination statements.

M.iii Salary Scales & Assignments

The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review found no indication of bias or discrimination in employment practices relating to salary and assignments.

Recommendation:

Several interviewees stated pay discrepancies have also led to low morale on campus. Interviewees stated the general pay for SFCC staff is below industry average and as a result, to recruit for openings, administration has been forced to offer higher pay on position openings. This has created a situation where new employees are being paid more than long-term and experienced staff, which has contributed to low morale and the general impression that staff are not valued. Interviewees suggested the college consider performing a pay study for the campus and re-evaluate salary and pay scales.

M.iv Equal Opportunity & Reasonable Accommodations

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship.

The investigation did not reveal any evidence of a violation.

The review found no indication of bias or discrimination in employment practices relating to salary and assignments.

Recommendation:

- An interview with the college's coordinator for employee reasonable accommodation found the college's practices and procedures are designed to ensure employees receive necessary accommodations. The review process also included interviews with several staff members requiring reasonable accommodations, both of which stated they had received the assistance they required in a timely manner. The review procedures however, identified some practices relating to faculty members requiring reasonable accommodations has created the general impression of bias among college employees and has made other employees apprehensive about asking for assistance.

The college's interpretation program employs several deaf faculty members that teach sign language. These faculty members have been employed with the college for years during which they have received necessary accommodations. However, last Spring these employees were asked to provide medical documentation of their

disability. Due to the timing of the request, the faculty member(s) were not able to gather necessary documentation and did not receive an interpreter for the first week of classes as required. The department was forced to use students, other faculty members and other measures to fill this gap and created the impression that the administration was creating obstacles for those employees requiring reasonable accommodations. Senior staff members explained that originally the college's Accessibility office, which is the office that provides student accommodations, had been facilitating employee accommodations. Due to the increasing workload of the Accessibility office, management made the decision to transfer the responsibility for providing reasonable accommodations to the Human Resource office and these issues had occurred during the period of transition. Regardless of circumstances interviewees stated some employees are under the belief that they may suffer negative consequences for requesting reasonable accommodations. It is recommended the college establish policies and procedures creating a uniform process for providing employee accommodations and creating an established to appeal decisions. In addition, it is recommended leadership communicate their commitment to provide reasonable accommodations to employees as required by law.

- In interviews with HR staff and review of the college's CCS Administrative Procedures (2.10.04-A Personnel Selection), the college's method for recruiting, screening, and selection of candidates for employment was reviewed and it was verified that the policies and procedures are in place to ensure an equitable process and to provide candidates equal opportunities regardless of their membership in a protected group. However, in interviews with college employees, several individuals stated that these processes are not always followed and provided several examples of appointments to senior and administrative positions that had not been opened for competition and other candidates. These interviewees stated that these appointments had mostly included Caucasian individuals creating the impression on campus of bias and discrimination by executive leadership.
- Interviewees also shared a lack of equity in stipend practices between faculty and staff that allowed faculty to have a stipend ceiling of 11,000 to 12,000 and climbing per academic year and exempt staff to reach a max stipend of \$5,000 per academic year for non-state funded (i.e. grant) projects.

Other Recommendations

Academics:

- Both students and employees interviewed reported one or more faculty members regularly express their disapproval of students attending college under the Running Start program. These faculty members have voiced their opposition to the program telling students "they don't belong in college" and give these students lower grades. Although the scope of this review does not include discrimination based on age, these practices violate both federal and state law. RCW 49.60.010 prohibits discrimination based on age in Washington State and the federal 1975 Age Discrimination Act (42 U.S.C. Sections 6101-6107) prohibits discrimination based on age for any institution receiving federal financial assistance.

- Some interviewees suggested the college re-evaluate the necessity and appropriateness of current prerequisites and placement tests for some programs. They noted for some certification programs in particular, these requirements seemed excessive and only posed a barrier to individuals interested in gaining skills for better employment. In addition, interviewees noted that the long and excessive prerequisites for math and English posed a financial barrier for some students. Interviewees stated the current requirements for several math and English courses prior to acceptance in some classes created a burden for students, especially those interested in programs that did not require strong academic skills in these areas.
- Several students suggested the college provide better information on courses. These students noted due to limited counseling services available, students often needed to select their classes prior to meeting with an advisor and better information on these classes, along with information on what pre-requisites each course satisfies, would be very useful.
- Faculty members interviewed asked for training on identification and management of disabilities that cannot be recognized by visual observation, and mental health issues. These interviewees noted they found it difficult to identify the issues facing a student and how to manage their behavior in a classroom setting.
- Student interviewees suggested training for faculty on different teaching techniques and how to modify courses to better reach students with disabilities that cannot be recognized by visual observation, such as dyslexia and autism.

Diversity, Equity and Inclusion:

- Interviews with individuals coordinating and investigating civil rights, title IX, and disability issues found that individuals tasked with these duties have sufficient training in civil rights issues however, none were aware of Washington State's guidelines requiring that anyone performing an investigation at a State agency must complete the State Investigation Course. We recommend the college ensure all those performing investigations complete this requirement prior to conducting any investigation.
- Based on feedback, the college's Bias Incident Team appears to be a useful and well-supported group, however interviewees suggested administration work to formalize the group and to adopt a method for the team to report their findings and conclusions to the campus community to create transparency. In addition, it was suggested a student representative be appointed to the team to incorporate the voice of the student population.
- College staff also suggested college leadership consider incorporating an equity and diversity statement into the college's strategic mission as an actionable item. Interviewees noted that although many institutions had such statements in their mission statement, without actionable items tied to the statements, they became vague ideals. They noted creating actionable deliverables would make the college's commitment to these goals more transparent and achievable.
- Several individuals interviewed suggested the addition of an office of Equity and Inclusion on campus. They noted currently most efforts to increase

inclusion were performed in a de-centralized manner. As a result, disbursement of information was difficult and often resulted in contradictory and mixed messages. In addition, in many cases the individuals performing this work did not have the resources or authority to expand their efforts campus-wide or to require other departments and divisions to participate. Interviewees pointed out the addition of this office would signal the college's commitment to these values. Interviewees stated the addition of a well-qualified individual with an allocated budget would ensure that all areas of campus were involved in efforts to increase and support diversity.

- Another suggestion offered was for the college to create a system that would allow students to anonymously self-report incidents of hate and discrimination on campus. This information would be useful in the creation of a DEI strategic plan and would be a way to alleviate the impression that students faced with challenges or disciplinary actions on campus did not have a voice or the power to report concerns over faculty and staff conduct. In addition, such a system would provide students an avenue to challenge possible retaliatory actions.
- Interviewees suggested SBCTC provide non-discrimination statements in various other languages on its website to help institutions disseminate the information to its community members.
- One of the individuals interviewed suggested finding a way for colleges to share ideas, resources, and programs used to promote diversity and equity, and to increase retention. She noted that each institution has found unique and successful ways to increase awareness on campuses and to promote and support minority populations that could be successfully adopted at other institutions.
- International students and those not familiar with the area requested resources and information regarding the surrounding area amenities such as banks, transportation, restaurants, etc. One international student suggested a safety briefing and another requested information on employment opportunities available to international, and unregistered students.

General:

- Interviewees stated better advertising and information regarding various programs would be beneficial to the community. Two specific areas mentioned were as follows: First, more advertising of certification and training programs. Interviewees stated these courses would be beneficial to a larger audience that may not be interested in working toward long-term degrees, but needed to advance their careers. The second area mentioned was more information and advertising about high demand programs with selective entry criteria. They stated they felt these courses could attract more students, but giving those interested good information on the requirements to be selected for the program would provide more transparency. They also suggested expanding these programs so more qualified individuals could participate.
- In addition to improving general advertising and information access, interviewees suggested improvements to the college's website by making more forms, information, and tools available on-line.
- Several individuals interviewed recommended the college consider providing students with advocates or resources to find advocacy services. Staff and

students noted when a student is faced with disciplinary action or needs assistance in specialized areas, they often feel powerless and are not familiar with their rights. Interviewees recommended the college provide or assist students in finding independent parties and organizations to advocate and assist students in these situations.

- Interviewees recommended the college consider increasing the number and quality of signage on campus. Specific Suggestions were as follows:
 - Interviewees noted the campus was large and had many buildings that are hard for a new comer to navigate. In addition, during certain times of the year signage could be hidden by trees. The interviewees noted that trying to find key locations on campus could be difficult and frustrating to newcomers. In addition to more and better signs, interviewees suggest a cheat-sheet or guide for visitors letting the reader know where the main offices and services are located.
 - Students also mentioned frustration with some posters and material posted on campus that contain partial or outdated information. These individuals stated many of the postings do not include any contact information or have outdated information. They suggested staff and faculty posting these notices ensure the information is correct prior to posting notices and to remove outdated materials.
 - Students interviewed mentioned the college's Magnussen Building was very confusing and difficult to navigate. They suggested putting up more signs in the building and/or ensuring the reception area was manned with someone to assist visitors and students.
- The inconvenience of the college's gym was mentioned as a source of frustration for some students. Some students noted the gym was necessary for their program (physical therapy), but the hours of the gym were not convenient. They stated some programs require a full-day of classroom time which did not allow time during the day to utilize the gym facility. Other students who had other family or job commitments complained the gym's hours made it inaccessible to them. Interviewees suggest extending the gym hours.
- Several students and employees suggested the college consider installing more gender-inclusive restrooms on campus. The college currently has a few single use bathrooms that have been designated as gender inclusive. However interviewees pointed out the single use restrooms create a feeling of isolation for those with non-traditional gender identities and created a security risk. Interviewees pointed out that with the change in demographics the college would need more facilities for students with non-traditional gender identities and that the addition of the bathrooms would signal the college's commitment to creating an inviting environment for all students regardless of their gender identity.
- Staff working with community members and involved in recruitment and marketing suggested the addition of more visitor parking, and an increase in the amount of time a visitor could use the spot. They noted currently the visitor spots were only 30 minutes which did not allow enough time for visitors to received orientation or to get much information. In addition, interviewees stated better signage was needed to notify visitors that parking in a non-visitor spot could result in a ticket.

- One student interviewee recommended the college consider making the campus smoke free.

Student Services:

- One of the sources of frustration for staff and faculty is the requirement for students to declare a major or area of study when registering. Staff noted some students were unsure of what they wanted to pursue and were only taking general classes and this requirement often created questions and anxiety for newer students or those who were unsure of their interests. They mentioned students could not make an appointment with a counselor until they had declared a major, which created a catch-22 situation for individuals needing advice on the programs they were interested in. They also mentioned new students were required to visit advising, but often did not know what they wanted to pursue and were therefore unable to register. The staff acknowledged a declared major or program could easily be changed and did not obligate a student to take specific classes, but pointed out students completing a registration form often did not know this.
- Several students and staff members interviewed suggested more classes and workshops on options and resources to finance a college education. They noted paying for education is usually the most difficult part of college life and reducing the stress and anxiety relating to this obstacle would be helpful to students.
- Another suggestion offered by interviewees was establishment of a mentoring program. Students and staff mentioned that for some students (such as international, first-generation, and students not proficient in English) having someone who could show them around and be available to answer questions would be welcomed and would help students better adjust to college environment. In addition to a mentoring program, some staff members suggested a program pairing students at higher risk of dropping out or failing with specific staff members to ensure the student had a resource to ask for needed support and to ensure that if the student was having difficulties they could be contacted quickly and provided with support.
- Faculty, staff and employees interviewed suggested an increase in mental health counselors. Currently the college only has one trained mental health counselor and those interviewed stated there was a need for more.
- Other interviewees requested extension of the hours for some services and areas. They noted that with full day programs, their availability to use some services was limited. Interviewees specifically named the tutoring center, the college gym, and the cafeteria as three areas/services with hours that limited student participation.

ATTACHMENT A

Applicable Requirements

Guidelines Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

General compliance

This review was conducted pursuant to OCR's authority under Section 504 and its implementing regulations at 34 C.F.R. Part 104 and Title II of the ADA and its implementing regulations at 28 C.F.R. Part 35. These laws prohibit discrimination on the basis of disability by institutions receiving federal financial assistance from the U.S. Department of Education and by public entities. As a public college that is also a recipient of financial assistance from the Department, the college is subject to the provisions of Section 504 and Title II.

For existing facilities, Section 504 and Title II require that an institution operate its program so that, when viewed in its entirety, it is readily accessible to persons with disabilities (program accessibility standard). Under this standard, an institution is not required to make all existing facilities or every part of its facilities accessible, as long as the program or activity provided at each facility is readily accessible to persons with disabilities. See 34 C.F.R. 104.22 and 28 C.F.R. 35.150. An institution can provide program accessibility for existing facilities through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, or any other methods that result in making its programs or activities accessible to persons with disabilities.

The accessibility standard used for each asset depends on the date construction commenced. Construction commenced after June 3, 1977, through January 26, 1992, must comply with the American National Standards Institute standards (ANSI). For construction projects starting January 26, 1992 through March 12, 2012, the 1991 ADA standards must be met. The colleges chose to follow the 1991 ADA standards rather than the UFAS standards where the option existed during this period. Any construction starting after March 12, 2012 must comply with the 2010 ADA standards identified in the International Building Code. New alterations to a facility or part of a facility are analyzed similarly to new construction.

The available facility construction and alteration dates for all Washington State buildings do not typically include accurate month and day information. The available data includes the year of construction and/or major renovation substantial completion. A major renovation is recorded when a construction renovation project includes at least one major building component and the cost is more than 60% of the building component value. Typically, major renovations address most building components and require compliance with current building code. Since the building construction or renovation date reflects the end of construction, the start of construction

or renovation was calculated based on a typical two-year construction period. The accessibility standard identified in the building list below reflects the beginning of construction dates. If no construction date data was available, the current standard was applied.

Parking Lots

Accessible parking spaces within student parking lots are the start of the accessible route to an accessible student program or activity. Therefore, all parking lots that are designated as student parking must be configured to eliminate all barriers along the accessible route to student programs and activities.

College parking lots are typically designated and reviewed individually (per Advisory section 208.2 in the 2010 ADA Standards) rather than as a whole campus. A college typically has dozens of parking lots that are loosely connected and hard to delineate. Typically lot boundaries are defined by physical barriers that restrict access between lots (lack an accessible route between lots or separated by significant distance). However, ADA parking spaces may be clustered in one or more lots if equivalent or greater accessibility is provided in terms of distance from the accessible entrance, parking fees and convenience. These requirements apply to free parking or any type of paid parking. If only paid parking is provided and the College also provides free visitor spaces, then the visitor spaces should be considered a separate lot and will require accessible parking.

Since parking lot resurfacing or restriping efforts are not recorded in a database, the age of the lots are not known. Parking lots are typically maintained, where resurfacing occurs roughly every twenty years. Therefore, all parking lots were reviewed with the assumption that they were no more than 20 years old. Nearly all college campuses are more than 20 years old. In cases where the parking lot appeared to have been recently striped (within 5 years) or was part of a new campus construction project, the current accessibility standard was applied.

Accessible Routes

An accessible route must be a continuous, unobstructed path connecting all accessible elements and spaces within and between buildings or facility elements where student programs or activities are provided by the college. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts. While not every route is required to be accessible, an accessible route must exist between all student programs or activities provided by the college. Alternate routes are allowable when the route does not require students with disabilities to traverse greater distances or in unfavorable conditions. All non-accessible parking areas and pedestrian routes should be marked as such with directional signage to the nearest accessible area or route.

Summary of Findings and Analysis

The following chart indicates the start of construction / alteration dates for the college facilities as well as the applicable accessibility standards.

| Building | Start of Construction, Major Renovation or acquisition (Most Recent Date) | Applicable Accessibility Standard |
|----------------------------------|---|---|
| Baseball Building | 1999 | 1991 Standard |
| Drama Storage Building | 2003 | 1991 Standard |
| Early Learning Center | 2011 | 1991 Standard |
| Falls Gateway | 2011 | 1991 Standard |
| Fine Arts | 1963 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Gymnasium | 2016 | 2010 Standard |
| Human Services | 2014 | 2010 Standard |
| Humanities | 1963 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Library | 2001 | 1991 Standard |
| Lodge | 2003 | 1991 Standard |
| Maintenance | 2007 | 1991 Standard |
| Music | 2008 | 1991 Standard |
| P.E. Annex | 2011 | 1991 Standard |
| Pesticide Storage Shed | 1998 | 1991 Standard |
| Science | 2009 | 1991 Standard |
| Sn-W'Ey'-Mn | 2005 | 1991 Standard |
| Softball Dugout - First Base | 2003 | 1991 Standard |
| Softball Dugout - Third Base | 2003 | 1991 Standard |
| Student Union Building | 2014 | 2010 Standard |
| Technical Arts | 1992 | 1991 Standard |
| Computing, Mathematics And Tech. | 2008 | 1991 Standard |
| Photography | 1985 | ANSI Standard |

| | | |
|--------------------------------|------|---|
| Science Greenhouse | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Early Learning Center, Storage | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Tennis Storage | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Baseball Dugout, First Base | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Baseball Dugout, Third Base | 1898 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |

Site Accessibility Compliance

S-1 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Humanities building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0536 in appendix.

Additional Field Notes: Exterior door to back stage area has a 3" transition.

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

S-2 **Non-Compliance:** The sidewalk slope is too steep near the P.E. Annex building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0542 in appendix.

Additional Field Notes: Route from accessible parking spot has six percent slope. Can move spot to flat portion of lot.

Applicable Standard (1991 ADA Standards):4.3.7 Slope. An accessible route with a running slope greater than 1:20 is a ramp and shall comply with 4.8. Nowhere shall the cross slope of an accessible route exceed 1:50.

Required Action to correct non-compliant component: An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided.

Current ADA Standard: 403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.

S-3 **Non-Compliance:** The access ramp is too steep near the Gymnasium building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0554 in appendix.

Additional Field Notes: Slope is 5.7 degrees at mid-pount of ramp.

Applicable Standard (1991 ADA Standards):4.8.2* Slope and Rise. The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be :12. The maximum rise for any run shall be 30 in (760 mm) (see Fig. 16). Curb ramps and ramps to be constructed on existing sites or in existing buildings or facilities may have slopes and rises as allowed in 4.1.6(3)(a) if space limitations prohibit the use of a 1:12 slope or less.

Required Action to correct non-compliant component: The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches.

Current ADA Standard: 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. Exception: In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

S-4 **Non-Compliance:** The path has a change in level that exceeds the allowable amount for an accessible route near the Technical Arts building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0561 in appendix.

Additional Field Notes: Transition at northwest building entrance 1".

Applicable Standard (1991 ADA Standards):4.3.8 Changes in Levels. Changes in levels

along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of “egress, means of” in 3.5.

Required Action to correct non-compliant component: Modify the path so that the change in level meets the accessibility requirements.

Current ADA Standard: 303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between 1/4 inch (6.4 mm) high minimum and 1/2 inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

S-5 **Non-Compliance:** The access ramp is too steep near the Library building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0568 in appendix.

Additional Field Notes: The upper portion of the ramp at the north entrance has a 7 percent slope. It may be possible to modify the staff entrance near the west building elevator to provide an accessible route to the Library for students. If this is possible, a directional sign must be installed at the non-compliant ramp directing students to the compliant ramp.

Applicable Standard (1991 ADA Standards):4.8.2* Slope and Rise. The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be :12. The maximum rise for any run shall be 30 in (760 mm) (see Fig. 16). Curb ramps and ramps to be constructed on existing sites or in existing buildings or facilities may have slopes and rises as allowed in 4.1.6(3)(a) if space limitations prohibit the use of a 1:12 slope or less.

Required Action to correct non-compliant component: The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches.

Current ADA Standard: 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. Exception: In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

Building Accessibility Compliance

B-1 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 120 of the Sn-W'Ey'-Mn building. See photo exhibit ADA0530 in appendix.

Field Notes: Display at 65"

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-2 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range in room 24-200G of the Sn-W'Ey'-Mn building. See photo exhibit ADA0531 in appendix.

Field Notes: Display at 69"

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in

(380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-3 **Non-Compliance:** The coat hooks are not located in a reachable range in room 15-121 of the Music building. See photo exhibit ADA0532 in appendix.

Field Notes: Hook at 55"

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-4 **Non-Compliance:** There are not enough accessible seats in room 15-110 of the Music building. See photo exhibit ADA0533 in appendix.

Field Notes: All areas provided are not on an accessible route (floor slope). Seven accessible seating locations required with adjacent accompanying seats.

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.1.3 Accessible Buildings: New Construction. Accessible buildings and facilities shall meet the following minimum requirements: (19)* Assembly areas: (a) In places of assembly with fixed seating accessible wheelchair locations shall comply with 4.33.2, 4.33.3, and 4.33.4 and shall be provided consistent with the following table: Capacity of Seating in Assembly Areas / Number of Required Wheelchair Locations: 4 to 25 / 1; 26 to 50 / 2; 51 to 300 / 4; 301 to 500 / 6; over 500 / 6, plus 1 additional space for each total seating capacity increase of 100. In addition, one percent, but not less than one, of all fixed seats shall be aisle seats with no armrests on the aisle side, or removable or folding armrests on the aisle side. Each such seat shall be identified by a sign or marker. Signage notifying patrons of the availability of such seats shall be posted at the ticket office. Aisle seats are not required to comply with 4.33.4.

Required Action to correct non-compliant component: Based on room capacity, provide at least six accessible seats plus one additional seat for each additional 150 seats. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 221.2.1 Number and Location. Wheelchair spaces shall be provided complying with 221.2.1.221.2.1.1 General Seating. Wheelchair spaces complying with 802.1 shall be provided in accordance with Table 221.2.1.1.

B-5 **Non-Compliance:** The coat hooks are not located in a reachable range in room 15-203 of the Music building. See photo exhibit ADA0534 in appendix.

Field Notes: Hook at 60"

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-6 **Non-Compliance:** The door is too narrow or does not have enough clear area in front of the door in room 5-109 of the Humanities building. See photo exhibit ADA0535 in appendix.

Field Notes: Both bathrooms are similar. A sign can be installed with directions to the closest accessible bathroom.

Applicable Standard: The most recent construction or major renovation efforts began in 1963 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide an opening that is at least thirty two (32) inches wide and a clear area of at least forty eight (48) inches in front of the opening. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1

B-7 **Non-Compliance:** 0 in room 5-129 of the Humanities building. See photo exhibit ADA0537 in appendix.

Field Notes: There is no accessible route to the stage or shop areas. A lift must be installed near the backstage entrance.

Applicable Standard: The most recent construction or major renovation efforts began in 1963 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: 0 Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 0

- B-8 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 5-129 of the Humanities building. See photo exhibit ADA0538 in appendix.

Field Notes: Display at 59". Chairs must be moved to allow access.

Applicable Standard: The most recent construction or major renovation efforts began in 1963 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-9 **Non-Compliance:** The shelf is not located within the required reachable range in room 28-125 of the Science building. See photo exhibit ADA0539 in appendix.

Field Notes: Shelf at 60". Coat hooks at "54". Coat hook need to be mounted at 48" max. Adjacent bathroom is similar.

Applicable Standard: The most recent construction or major renovation efforts began in 2009 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.25.3 Height. Accessible storage spaces shall be within at least one of the reach ranges specified in 4.2.5 and 4.2.6 (see Fig. 5 and Fig 6). Clothes rods or shelves shall be a maximum of 54 in (1370 mm) above the finish floor for a side approach. Where the distance from the wheelchair to the clothes rod or shelf exceeds 10 in (255 mm) (as in closets without accessible doors) the height and depth to the rod or shelf shall comply with Fig. 38(a) and Fig. 38(b).

Required Action to correct non-compliant component: Locate the shelf between forty (40) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-10 **Non-Compliance:** The back wall grab bar does not meet the requirements for transfers in room 13-102A of the P.E. Annex building. See photo exhibit ADA0540 in appendix.

Field Notes: Missing grab bars, paper towel dispenser mounted higher than 48", missing sink pipe insulation, mirror bottom above 40", coat hooks mounted above 48", shower not roll-in type with accessible controls. A sign can be installed stating that bathroom is not accessible with directions to nearby accessible locker room.

Applicable Standard: The most recent construction or major renovation efforts began in 2011 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section A4.16.4 Grab Bars. Fig. A6(a) and (b) show the diagonal and side approaches most commonly used to transfer from a wheelchair to a water closet. Some wheelchair users can transfer from the front of the toilet while others use a 90-degree approach. Most people who use the two additional approaches can also use either the diagonal approach or the side approach.

Required Action to correct non-compliant component: Provide a grab bar on the back wall that is at least thirty six (36) inches long or at least twenty four (24) inches long if it is obstructed and centered on the toilet. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 604.5 Grab Bars. Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall. 604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side. EXCEPTIONS: 1. The rear grab bar shall be permitted to be 24 inches (610 mm) long minimum, centered on the water closet, where wall space does not permit a length of 36 inches (915 mm) minimum due to the location of a recessed fixture adjacent to the water closet.

- B-11 **Non-Compliance:** The coat hooks are not located in a reachable range in room 13-107A of the P.E. Annex building. See photo exhibit ADA0541 in appendix.

Field Notes: Multiple standard violations - similar to other "Inclusive, gender neutral" bathroom. Can add a sign stating that this is not an accessible bathroom with directions to locker room.

Applicable Standard: The most recent construction or major renovation efforts began in 2011 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-12 **Non-Compliance:** The ramp slope is too steep or the access route has a transition that is not accessible in room 9-0001 of the Lodge building. See photo exhibit ADA0543 in appendix.

Field Notes: Ramp slope 8 degrees at bathroom entrance. Must provide a directional sign to accessible bathroom on first floor.

Applicable Standard: The most recent construction or major renovation efforts began in 2003 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.8.2* Slope and Rise. The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be 1:12. The maximum rise for any run shall be 30 in (760 mm) (see Fig. 16). Curb ramps and ramps to be constructed on existing sites or in existing buildings or facilities may have slopes and rises as allowed in 4.1.6(3)(a) if space limitations prohibit the use of a 1:12 slope or less.

Required Action to correct non-compliant component: Provide a ramp that does not exceed a 1:12 slope. Some exceptions are allowed if there are space limitations. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. Exception: In existing sites, buildings, and facilities, ramps

shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

- B-13 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 7-134 of the Gymnasium building. See photo exhibit ADA0555 in appendix.

Field Notes: Missing cane detection

Applicable Standard: The most recent construction or major renovation efforts began in 2016 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-14 **Non-Compliance:** A building element protrudes into the circulation path more than 4" near room 7-133 of the Gymnasium building. See photo exhibit ADA0556 in appendix.

Field Notes: Missing cane detection

Applicable Standard: The most recent construction or major renovation efforts began in 2016 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-15 **Non-Compliance:** The coat hooks are not located in a reachable range in room 7-133 of the Gymnasium building. See photo exhibit ADA0557 in appendix.

Field Notes: Hook at 66"

Applicable Standard: The most recent construction or major renovation efforts began in 2016 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-16 **Non-Compliance:** The urinal basin rim is located too high in room 16-130 of the Human Services building. See photo exhibit ADA0558 in appendix.

Field Notes: Urinal rims at 20". One must comply. College can alternatively provide sign to direct students to adjacent accessible bathroom.

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 213.3.3 Urinals. Where more than one urinal is provided, at least one shall comply with 605.2 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

Required Action to correct non-compliant component: Locate the urinal basin rim at seventeen (17) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 213.3.3 Urinals. Where more than one urinal is provided, at least one shall comply with 605.2 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

B-17 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 16-105 of the Human Services building. See photo exhibit ADA0559 in appendix.

Field Notes: Top shelf at 61"; bottom shelf below 15"

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth

of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-18 **Non-Compliance:** The sink rim height is too high in room 6-0110 of the Fine Arts building. See photo exhibit ADA0560 in appendix.

Field Notes: Sink rim at 36".

Applicable Standard: The most recent construction or major renovation efforts began in 1963 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. The term "readily accessible" is defined in the Code of Federal Requirements Title 34, Section 104.22 and Title 28, Section 35.150.

Required Action to correct non-compliant component: Locate the sink rim at thirty four (34) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.3 Height. Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground. EXCEPTIONS: 1. A lavatory in a toilet or bathing facility for a single occupant accessed only through a private office and not for common use or public use shall not be required to comply with 606.3.2. In residential dwelling unit kitchens, sinks that are adjustable to variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted where rough-in plumbing permits connections of supply and drain pipes for sinks mounted at the height of 29 inches (735 mm).

- B-19 **Non-Compliance:** There is not enough knee clearance under the table near room 19-104B of the Technical Arts building. See photo exhibit ADA0562 in appendix.

Field Notes: Knee clearance 22" wide in all workstations. One workstation must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 1992 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) wide minimum. 306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (430 mm) minimum under the element.

B-20 **Non-Compliance:** The sink rim height is too high near room 19-104B of the Technical Arts building. See photo exhibit ADA0563 in appendix.

Field Notes: Sink rim at 36"

Applicable Standard: The most recent construction or major renovation efforts began in 1992 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.24.2 Height. Sinks shall be mounted with the counter or rim no higher than 34 in (865 mm) above the finish floor.

Required Action to correct non-compliant component: Locate the sink rim at thirty four (34) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.3 Height. Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground. EXCEPTIONS: 1. A lavatory in a toilet or bathing facility for a single occupant accessed only through a private office and not for common use or public use shall not be required to comply with 606.3.2. In residential dwelling unit kitchens, sinks that are adjustable to variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted where rough-in plumbing permits connections of supply and drain pipes for sinks mounted at the height of 29 inches (735 mm).

B-21 **Non-Compliance:** The opening force is too great in room 19-104B of the Technical Arts building. See photo exhibit ADA0564 in appendix.

Field Notes: Opening pressure 10 pounds.

Applicable Standard: The most recent construction or major renovation efforts began in 1992 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.13.11* Door Opening Force. The maximum force for pushing or pulling open a door shall be as follows: (2) Other doors. (b) interior hinged doors: 5 lbf (22.2N)

Required Action to correct non-compliant component: Adjust door opening force so that it is less than five pounds for interior and fifteen (15) pounds for exterior doors. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.9 Door and Gate Opening Force. Fire doors

shall have a minimum opening force allowable by the appropriate administrative authority. The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds (22.2 N) maximum. 2. Sliding or folding doors: 5 pounds (22.2 N) maximum. These forces do not apply to the force required to retract latch bolts or disengage other devices that hold the door or gate in a closed position. 2009 IBC 1008.1.3 Door opening force. The force for pushing or pulling open interior swinging egress doors, other than fire doors, shall not exceed 5 pounds (22 N). For other swinging doors, as well as sliding and folding doors, the door latch shall release when subjected to a 15-pound (67 N) force. The door shall be set in motion when subjected to a 30-pound (133 N) force. The door shall swing to a full-open position when subjected to a 15-pound (67 N) force.

B-22 Non-Compliance: The sink drain pipe and hot water lines are not insulated or protected in room 19-104B of the Technical Arts building. See photo exhibit ADA0565 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 1992 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.24.6 Exposed Pipes and Surfaces. Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water lines. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-23 Non-Compliance: The materials or other components provided for students are not located within the accessible reach range near room 19-103 of the Technical Arts building. See photo exhibit ADA0566 in appendix.

Field Notes: Display top at 54"

Applicable Standard: The most recent construction or major renovation efforts began in 1992 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed

shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-24 **Non-Compliance:** The opening force is too great near room 19-110 of the Technical Arts building. See photo exhibit ADA0567 in appendix.

Field Notes: Multiple classroom doors along corridor have opening pressure of 7 to 10 pounds.

Applicable Standard: The most recent construction or major renovation efforts began in 1992 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.13.11* Door Opening Force. The maximum force for pushing or pulling open a door shall be as follows: (2) Other doors. (b) interior hinged doors: 5 lbf (22.2N)

Required Action to correct non-compliant component: Adjust door opening force so that it is less than five pounds for interior and fifteen (15) pounds for exterior doors. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.9 Door and Gate Opening Force. Fire doors shall have a minimum opening force allowable by the appropriate administrative authority. The force for pushing or pulling open a door or gate other than fire doors

shall be as follows:1. Interior hinged doors and gates: 5 pounds (22.2 N) maximum.2. Sliding or folding doors: 5 pounds (22.2 N) maximum. These forces do not apply to the force required to retract latch bolts or disengage other devices that hold the door or gate in a closed position. 2009 IBC 1008.1.3 Door opening force. The force for pushing or pulling open interior swinging egress doors, other than fire doors, shall not exceed 5 pounds (22 N). For other swinging doors, as well as sliding and folding doors, the door latch shall release when subjected to a 15-pound (67 N) force. The door shall be set in motion when subjected to a 30-pound (133 N) force. The door shall swing to a full-open position when subjected to a 15-pound (67 N) force.

B-25 **Non-Compliance:** There is not enough knee clearance under the table near room 2-107 of the Library building. See photo exhibit ADA0569 in appendix.

Field Notes: All open tables have 25" clearance.

Applicable Standard: The most recent construction or major renovation efforts began in 2001 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.32.3 Knee Clearances. If seating for people in wheelchairs is provided at tables or counters, knee spaces at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided (see Fig. 45).

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) wide minimum.

B-26 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 2-001 of the Library building. See photo exhibit ADA0570 in appendix.

Field Notes: Display top at 55"

Applicable Standard: The most recent construction or major renovation efforts began in 2001 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-27 **Non-Compliance:** The required number of accessible work stations or other surfaces are not provided in the Falls Gateway building. See photo exhibit ADA0571 in appendix.

Field Notes: Workstations outside of administration are not accessible. One workstation must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2011 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.1.3 Accessible Buildings: New Construction. (18) If fixed or built-in seating or tables (including, but not limited to, study carrels and student laboratory stations), are provided in accessible public or common use areas, at least five percent (5%), but not less than one, of the fixed or built-in seating areas or tables shall comply with 4.32. An accessible route shall lead to and through such fixed or built-in seating areas, or tables.

Required Action to correct non-compliant component: Provide accessible work stations or other work surfaces. At least five percent of the total stations provided must be accessible. A minimum of one is required. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 226.1 General. Where dining surfaces are provided for the consumption of food or drink, at least 5 percent of the seating spaces and

standing spaces at the dining surfaces shall comply with 902. In addition, where work surfaces are provided for use by other than employees, at least 5 percent shall comply with 902. 902.1 General. Dining surfaces and work surfaces shall comply with 902.2 and 902.3. EXCEPTION: Dining surfaces and work surfaces for children's use shall be permitted to comply with 902.4. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3.

B-28 **Non-Compliance:** The service counter is too high and/or too narrow in the Falls Gateway building. See photo exhibit ADA0572 in appendix.

Field Notes: Service counter at counseling center is 48".

Applicable Standard: The most recent construction or major renovation efforts began in 2011 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 7.2 Sales and Service Counters, Teller Windows, Information Counters. (1) In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type shall have a portion of the counter which is at least 36 in (915mm) in length with a maximum height of 36 in (915 mm) above the finish floor. It shall be on an accessible route complying with 4.3. The accessible counters must be dispersed throughout the building or facility. In alterations where it is technically infeasible to provide an accessible counter, an auxiliary counter meeting these requirements may be provided.

Required Action to correct non-compliant component: Provide a service counter that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or twenty four (24) inches long for a front approach. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to

have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

- B-29 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range in the Falls Gateway building. See photo exhibit ADA0573 in appendix.

Field Notes: Display top is 54" - near counseling center

Applicable Standard: The most recent construction or major renovation efforts began in 2011 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

- B-30 **Non-Compliance:** The urinal basin rim is located too high near room 18-113 of the Computing, Mathematics And Tech. building. See photo exhibit ADA0574 in appendix.

Field Notes: Urinals at 20". One must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.18.2 Height. Urinals shall be stall-type or wall-hung with an elongated rim at a maximum of 17 in (430 mm) above the finish floor.

Required Action to correct non-compliant component: Locate the urinal basin rim at seventeen (17) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 213.3.3 Urinals. Where more than one urinal is provided, at least one shall comply with 605.2 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

B-31 **Non-Compliance:** The urinal basin rim is located too high in room 18-205 of the Computing, Mathematics And Tech. building. See photo exhibit ADA0575 in appendix.

Field Notes: Urinals at 20"

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.18.2 Height. Urinals shall be stall-type or wall-hung with an elongated rim at a maximum of 17 in (430 mm) above the finish floor.

Required Action to correct non-compliant component: Locate the urinal basin rim at seventeen (17) inches maximum above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 213.3.3 Urinals. Where more than one urinal is provided, at least one shall comply with 605.2 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

B-32 **Non-Compliance:** A building element protrudes into the circulation path more than 4" in room 18-219 of the Computing, Mathematics And Tech. building. See photo exhibit ADA0576 in appendix.

Field Notes: Drinking fountain protrudes over 12". Cane detection required

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section A4.4.1 General. Service animals are trained to recognize and avoid hazards. However, most people with severe impairments of vision use the long cane as an aid to mobility. The two principal cane techniques are the touch technique, where the cane arcs from side to side and touches points outside both shoulders; and the diagonal technique, where the cane is held in a stationary position diagonally across the body with the cane tip touching or just above the ground at a point outside one shoulder and the handle or grip extending to a point outside the other shoulder. The touch technique is used primarily in uncontrolled areas, while the diagonal technique is used primarily in certain limited, controlled, and familiar environments. Cane users are often trained to use both techniques. Potential hazardous objects are noticed only if they fall within the detection range of canes (see Fig. A4). Visually impaired people walking toward an object can detect an overhang if its lowest surface is not higher than 27 in (685 mm). When walking alongside protruding objects, they cannot detect overhangs. Since proper cane and service animal techniques keep people away from the edge of a path or from walls, a slight overhang of no more than 4 in (100 mm) is not hazardous.

Required Action to correct non-compliant component: Provide cane-detectable elements on each side of the building component that protrudes into the circulation path. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

B-33 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 18-219 of the Computing, Mathematics And Tech. building. See photo exhibit ADA0577 in appendix.

Field Notes: Display to at 54". Also must remove desk in front of display.

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b). 4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig 6(c).

Required Action to correct non-compliant component: Provide all student

materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-34 **Non-Compliance:** The coat hooks are not located in a reachable range near room 17-126 of the Student Union building. See photo exhibit ADA0578 in appendix.

Field Notes: Hook at 54"

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Locate coat hooks between fifteen (15) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-35 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected in room 17-126 of the Student Union building. See photo exhibit ADA0579 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-36

Non-Compliance: The materials or other components provided for students are not located within the accessible reach range near room 17-117 of the Student Union building. See photo exhibit ADA0580 in appendix.

Field Notes: Display top at 60"

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student

materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed.

Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm)

minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction.

The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1

Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-37 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 17-118 of the Student Union building. See photo exhibit ADA0581 in appendix.

Field Notes: Display height at 72". Racks in front of display must be moved.

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40

inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-38 **Non-Compliance:** The service counter is too high and/or too narrow near room 17-143 of the Student Union building. See photo exhibit ADA0582 in appendix.

Field Notes: Service counter is 38".

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

Required Action to correct non-compliant component: Provide a service counter that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or twenty four (24) inches long for a front approach. Since accessibility barriers must be removed, the modifications must comply with current

accessibility standards.

Current ADA Standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top.

EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

- B-39 **Non-Compliance:** The materials or other components provided for students are not located within the accessible reach range near room 17-201 of the Student Union building. See photo exhibit ADA0583 in appendix.

Field Notes: Top of display at 70"

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Provide all student materials or other required components at a reachable height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a

high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

B-40 **Non-Compliance:** The service counter is too high and/or too narrow near room 17-201 of the Student Union building. See photo exhibit ADA0584 in appendix.

Field Notes: Service counters at 48".

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

Required Action to correct non-compliant component: Provide a service counter that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or twenty four (24) inches long for a front approach. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

B-41 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected near room 17-226 of the Student Union building. See photo exhibit ADA0585 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

Required Action to correct non-compliant component: Provide insulation or other protection over the sink drain pipe and hot water line. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

B-42 **Non-Compliance:** The shelf is not located within the required reachable range near room 17-226 of the Student Union building. See photo exhibit ADA0586 in appendix.

Field Notes: Shelf height is 51"

Applicable Standard: The most recent construction or major renovation efforts began in 2014 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Required Action to correct non-compliant component: Locate the shelf between forty (40) and forty eight (48) inches above the floor. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

2018-2019 Civil Rights Review
 Voluntary Compliance Plan (VCP)
 Spokane Falls Community College

| | |
|-----------------------------------|--|
| College Contact/Liaison: | Chrissy Davis Jones, Vice-President of Student Affairs |
| Last Day of Site Visit: | November 22, 2019 |
| Letter of Finding Date: | January 30, 2020 |
| VCP Date: | |
| Final Completion Date: | |
| Completion Date: | |
| Final VCP Acceptance Date: | |

A ADMINISTRATIVE

Recipients need to have a certain basic requirements in place to comply with OCR Guidelines. Title IX, Section 504, and Title II. These basic procedures include an annual public notice, continuous notifications, designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II and a grievance procedure that will allow students an avenue for dealing with alleged discrimination.

(ix) Continuous Notification:

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Results of Compliance Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|---|--|----------------------------------|-----------------------|-------------------------|--------------------------|
| A.i.I | Non-Compliance: The college's website contains a link at the bottom of the main page called "Equal | The college has changed the name of the link to "Equal Opportunity | Chief Public Information Officer | April 30, 2020 (prior | March 15, 2020 | |

| | | | | | | |
|---------------------|---|--|--|---------------------------------------|--|--|
| | <p>Opportunity Employer”. The link leads the reader to an Equal Opportunity Statement listed under “Public Disclosures.” The statement published at this location includes all required information however, the information regarding the coordinators is incorrect. The notice directs readers to a prior coordinator. In addition, on the bottom of this section, a link is available for “Notice of Nondiscrimination in Vocational Education Program”. This link also leads the reader to a complete and accurate statement with outdated coordinator information.</p> | <p>Institution” and the statements list the individuals responsible for addressing grievances https://sfcc.spokane.edu/About-Us/Public-Disclosures</p> | <p>(CPIO) and Chief Compliance Officer (CCO)</p> | <p>to spring term)</p> | | |
| <p>A.i.2</p> | <p>Non-Compliance: A review of 52 printed items and publications found that in most cases, the college is using a complete non-discrimination statement with the correct language and coordinator information. However, the non-discrimination statement is not included or is incomplete in several key documents, to include the <u>paper application for the college, the catalog, the student newspaper, the student handbook and student job applications</u>. In addition, in 13 items reviewed, the college used a condensed or shortened version of</p> | <p>The college has updated the language and current coordinator contact information on its website as well as its online catalog. https://sfcc.spokane.edu/About-Us/Public-Disclosures/Right-to-Know/Notice-of-Non-Discrimination-in-Vocational-Educati online catalog:</p> | <p>Vice President for Student Affairs (VPSA): paper application, student newspaper (in collaboration with Vice President of Learning (VPL)), student handbook, and student</p> | <p>September 30, 2020 (fall term)</p> | | |

| | | | | | | |
|--|---|---|---|--|--|--|
| | <p>the statement that does not include a link to the complete non-discrimination statement.</p> | <p>http://catalog.spokane.edu/RightsAndRules.aspx?Page=PV4</p> <p>The college has started the process of gathering and prioritizing all printed materials (admissions & registration forms, student handbook, student job applications, school newspaper) that require a link to the full non-discrimination statement and is working with the District Marketing and Public Information Office to ensure accuracy prior to printing.</p> | <p>job application.</p> <p>Provost: College catalog</p> | | | |
|--|---|---|---|--|--|--|

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscrimination on their main website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, or employees.

The college should rename the notice on its main webpage to “non-discrimination notice”, equal opportunity institution, or use other language that indicates the college follows non-discrimination laws in all its activities rather than only as an employer, as the current title suggests. In addition, the college should update all the statements on its webpage with information on current coordinators.

In addition, the college should ensure the statement is included in all key documents such as catalogs, handbooks, job applications, and the school newspaper.

Finally, for printed materials, in which the shortened and/or condensed version of the non-discrimination statement is used, a link to the full non-discrimination statement should be included

(x) Title IX, Section 504, and Title II Coordinators:

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use the coordinator’s name for the contact information for printed materials, but it is not necessary. Identification of the coordinator’s title is sufficient for printed materials. For the college’s website, the name of the coordinator(s) must be included.

Results of Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|---|--|--|--|------------------|-------------------|
| A.ii | Non-Compliance: The college has designated coordinators for Title IX and disability services as required but has not updated its website to include updated information on these appointed coordinators. | The college in partnership with the CPIO and CCO has updated its Title IX and ADA compliance points of contact. https://sfcc.spokane.edu/About-Us/Public-Disclosures https://sfcc.spokane.edu/For-Our-Students/Student-Resources/Disability-Support-Services https://sfcc.spokane.edu/For-Our- | Chief Public Information Officer, Chief Compliance Officer, and Vice President for Student Affairs | September 30, 2020 (fall term) for required printed materials. The college has already taken corrective action on its website. | | |

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| | | Students/Student-Resources/Disability-Support-Services/contact https://sfcc.spokane.edu/About-Us/Public-Disclosures/Right-to-Know/SexualAssault The college is gathering and prioritizing all printed materials to ensure the link to the full non-discrimination statement is included. | | | | |
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Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy on its website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. Inclusion of an email address is encouraged, but not required at this time.

(xi) Annual Public Notification:

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and disabled individuals. A brief summary of program offerings and admission criteria should be included in the annual announcement, as well as the name, address and telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language

skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------|---|---|------------------------|-------------------------------------|------------------|-------------------|
| A.iii | Non-Compliance: Based on information provided and documents reviewed, Spokane Falls did not publish an annual non-discrimination notice at the beginning of the fall term as required. | The VPSA worked with the Institutional Research Office (IRO) to identify the limited English language communities in SFCC's service area using U.S. Census data. The top four languages include Spanish (2.1%), Russian (1.5%), Chinese (.5%), and Vietnamese (.4%). The notice was published in <i>The Spokesman Review</i> on March 6, 2020 and the student newspaper <i>The Communicator</i> on March 20, 2020. The notice will be published and emailed to currently enrolled students by Student Affairs each September to ensure compliance. Moreover, SFCC/CCS will take steps to assure that the | CPIO, CCO, VPSA | August 1, 2020 (prior to fall term) | | |

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| | | <p>lack of English language skills will not be a barrier to admission and participation in career and technical education programs.</p> <p>Each fall, a notice is mailed to each employee's home address with the required information.</p> | | | | |
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Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term, which includes all required components noted above. The notification should include a brief summary of the college's program offerings, admission criteria, and the name or title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that will reach students, employees, applicants, and communities of national origin minority with limited English language skills in the area. Distribution of the notice on the college's main website is acceptable.

In addition, since the college has acknowledged that its service area includes one or more "communities of national origin minority persons with limited English language skills", it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them.

(xii) Grievance Procedures:

Federal law requires colleges to adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| A.iv | The review did not reveal any evidence of a violation. | Not applicable | | | | |
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| B SITE LOCATION AND STUDENT ELIGIBILITY CRITERIA |
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Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability. Issues that could result in discrimination or segregation include the selection of certain sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, national origin, sex, or disability.

(vii) Student Eligibility:

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminates on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocation education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| B.i | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(viii) Site Selection and Modifications:

Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| B.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(ix) Residency:

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| B.iii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

C RECRUITMENT

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should include individuals from different races, national origins, sex, and disabilities.

(xiii) Recruitment Activities:

Recipients must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| <p>C.i</p> | <p>Non-Compliance: The review found no indication of bias or evidence that opportunities were being limited to individuals from any group however, the college is not conducting any recruitment activities designed to attract students from communities of color, those with limited English proficiency, or special populations.</p> | <p>It is important to note that additional college personnel assist with recruitment activities in underserved/special populations communities. For example, the Dean of Student Support Services, Director of Financial Aid (and staff too), and even the VPSA are often invited and attends several community of color events such as Unity in the Community as a representative of the college. At these events, the aforementioned college representatives presents/speaks to the communities about educational opportunities including Concurrent Enrollment/Running Start as well as the many services available to students to support their academic pursuits.</p> <p>The college updated the position description for</p> | <p>VPSA in partnership with the District Marketing & Business/Purchasing Offices</p> | <p>February 2021 (Work is in progress and requires coordination between multiple offices and Spokane Community College.)</p> | | |
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| | | <p>the Manager of Outreach and Recruitment to include bi/multilingual as a preferred qualification due to the upcoming (June 2020) retirement in the Outreach and Recruitment Office.</p> <p>Since recruitment materials are utilized districtwide, the VPSA met with the VPSS at Spokane Community College and District Marketing to identify marketing and recruitment materials for limited English language communities.</p> <p>To ensure access to the underrepresented communities served by the colleges, the group identified—the mini viewbook, “How to pay for college” brochure, and concurrent/dual enrollment materials as those most often used for outreach and recruitment efforts.</p> <p>These materials will be</p> | | | | |
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| | | translated in the top four languages spoken in the college's service areas. | | | | |
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Required Action:

The college should incorporate marketing and recruitment efforts that target communities of color, those communities that are not proficient in English, and other underserved/special populations.

(xiv) Recruitment Materials:

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| C.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xv) Recruitment Teams:

To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| C.iii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xvi) Counseling LEP/Sensory Impairments:

Recipients must ensure that counselors can effectively communicate with individuals with limited English proficiency and sensory impairments.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|--|---|---|--|------------------|-------------------|
| C.iv | <p>Non-Compliance: The college's Student Services staff have access to staff members who are fluent in Spanish, and able to assist students that are native Spanish speakers however, the college has not determined all the languages spoken by the communities in the area and could not demonstrate that its employees can effectively communicate with all communities in the area in their native language. In addition, staff members working in student service areas were not aware of any guidelines on how to effectively communicate with community members that were not proficient in English, when they could not find an informal translator such as a student or a co-worker.</p> | <p>This work is in progress and several meetings have been convened to address this finding. The VPSA worked with the Institutional Research Office (IRO) to identify (using U.S. Census data) the top 4 non-English languages spoken in its service area. The top four languages include Spanish (2.1%), Russian (1.5%), Chinese (.5%), and Vietnamese (.4%). The VPSA from SFCC met with the VPSS from SCC to discuss the current and future states of informal and formal guidelines to support student services professionals (i.e., outreach/recruitment, admission/registration, placement testing, financial aid, counseling, etc.) in communicating with limited English language learners. The</p> | <p>VPSA and VPSS (SCC) in partnership with the CCO, Human Resources Office (HRO) and Business/Purchasing Office</p> | <p>February 28, 2021 (The college is working on the process to differentiate informal and formal guidelines and securing a contract for services while adhering to purchasing guidelines and regulations.)</p> | | |

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| | | <p>colleges will enter into an agreement with a local interpreting service provider. The VPs will work with their respective teams to draft language to inform these processes. At the end of spring term and through the summer/early fall, the two administrative groups will meet frequently to create one document which comprehensively outlines resources for communicating with non-English language learners, guidelines and processes that inform employees when it is appropriate to request formal interpreting and translating services. The college will facilitate trainings to communicate the new process and disseminate the guidelines to student affairs employees.</p> | | | | |
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Required Action:

The college should determine the languages spoken in the communities in its service area and take steps to ensure individuals involved in recruitment, counseling, and student services have the necessary tools and resources to communicate effectively with these community

members. Finally, the college should establish and distribute guidelines on how employees should communicate with individuals who are not proficient in English. The guidelines should include directions notifying employees when an informal interpreter is not appropriate, and how to access translation and interpretation services.

(xvii) Promotional Effects:

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| C.v | The review did not reveal any evidence of a violation | Not applicable | | | | |

(xviii) Promotional Effects:

If a recipient's service area contains a community with person of limited English proficiency, information must be available to that community in its language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|--|--|--|-------------------------|--------------------------|
| C.vi | Non-Compliance: The college acknowledges that it serves varies communities that speak languages other than English, but has not determined all languages spoken by these communities and therefore could not demonstrate that these communities were being served. Interviewees all acknowledged that Spanish was a language spoken by a significant number of area | The college has worked with the District Marketing department and Spokane Community College to identify the recruitment and promotional materials that need to be translated to the top four languages spoken in | VPSA and VPSS (SCC) in partnership with the CCO, Human Resources Office (HRO) and Business/Purchasing Office | February 28, 2021 (The college is working on the process to differentiate informal and formal guidelines and securing | | |

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| | <p>residents, however the college does not offer recruitment materials in Spanish.</p> <p>In addition, interviewees working in the student service area stated that when they worked with students and community members who were not proficient in English, they found a co-worker or student for interpretation, but did not know what to do if an informal interpreter could not be located.</p> | <p>the college's service areas.</p> <p>The college is also developing guidelines and processes that will inform employees how they should communicate with non-English language learners and when it is appropriate to utilize formal interpretation and translation services. For continuous quality improvement, the college will work with its IRO to conduct periodic (annual) assessments of the community it serves to determine new groups/communities.</p> | | <p>a contract for services while adhering to purchasing guidelines and regulations. An assessment of new groups/communities in the college's service areas will be performed annually.</p> | | |
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Required Action:

The college should evaluate what communities of limited English proficiency it currently serves and begin the process of translating recruitment and promotional materials to those languages. In addition, the college should perform periodic assessments of the community it serves to determine if new groups and communities have moved to the area and to determine if materials should be offered in any other languages. Finally, the college should establish and distribute guidelines on how employees should communicate with individuals who are not native English speakers and instructions to determine when an informal translator is not appropriate, and how to access translation and interpretation services.

D ADMISSIONS

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex, or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

(xiii) Discriminatory Criteria:

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|---|--|--|-------------------------|--------------------------|
| D.i | <p>Non-Compliance: Campus community members interviewed stated the college's administration sends out a clear message notifying all community members that discriminatory behavior, to include bullying, inappropriate behavior, and engaging in any activity viewed as discriminatory, will not be tolerated. As proof of this, they mentioned a letter sent by the Chancellor to all students, staff and faculty at the beginning of the term communicating these expectations and the numerous signs and notices on campus.</p> <p>Despite these efforts, in interviews with employees and students, interviewees stated they had heard and knew of inappropriate and derogatory racial comments made by staff and faculty. Those interviewed acknowledged the recent dismissal of a staff member had made such inappropriate comments indicates that</p> | <p>Diversity, Equity, and Inclusion (DEI) is a cornerstone of the college's work as reflected in the college's mission, vision, values, and core themes. This has and will continue to be an ongoing practice at SFCC; especially as the college advances its Guided Pathways efforts with equity front and center. Please see Appendix A for a comprehensive list of the DEI trainings offered and scheduled, including those designed</p> | <p>SFCC Cabinet (President, VPSA, VPL)</p> | <p>Currently in progress and On-going (DEI work is continuous)</p> | | |

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| | college administration deals with these types of incidents quickly and decisively, but those being interviewed indicated the behavior is still prevalent on campus. | specifically for teaching faculty. | | | | |
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Required Action:

The college should provide diversity and other appropriate training to employee, as well as training on how to better communicate and work with individuals from protected and non-traditional populations. Specifically, interviewees recommended training in Multidimensional Diversity, Stage Model, Primary and secondary dimensions of diversity, and the theories of diversity. In addition, interviewees also suggested training on equity in teaching for faculty, who, unknowingly might engage in discriminatory behavior in classrooms. Those interviewed also emphasized the need for executive management and college leadership to participate in this training to set the tone on campus and to signify administration’s commitment to these principles. In addition, the college should continue practices designed to notify the campus community inappropriate behavior will not be tolerated.

(xiv) Preadmission Inquiries:

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.ii | The review did not find any evidence of a violation. | Not applicable | | | | |

(xv) Disabled & Employment Limitation:

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.iii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xvi) LEP & Benefit Limitation:

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.iv | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xvii) Preadmission Tests:

Postsecondary admission's tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.v | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xviii) Disability Inquiries:

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.vi | The review did not reveal any evidence of a violation. | Not applicable | | | | |

E STUDENT FINANCIAL ASSISTANCE

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination to access to total scholarships on the basis of sex, race, national origin, or disability.

(ix) Financial Assistance Availability:

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.i | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(x) Sex Restricted Awards:

Sex restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xi) Equitable Financial Aid Information:

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------|--|--|---|--|------------------|-------------------|
| E.iii | Non-Compliance: The review of financial aid information and materials distributed by the college and on the college's, website appear to be equitably written without any indication of bias however, the review found the majority of the material and forms providing information and used by the department did not include a non-discrimination notice. | Currently in progress. The VPSA met with the Director of Financial Aid to discuss and gather all FA forms to ensure that the non-discrimination statement with a link to the full statement is available on all FA forms. Forms that are out of compliance with be updated and sent to the college's copy shop for printing. | VPSA and Director Financial Aid (FA) in partnership with CPIO | September 2020 (prior to the FAFSA launch in October for academic year 2021) | | |

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials, to include all financial aid forms and informational pamphlets made available to participants, students, applicants, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at: <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. This statement should be included on all financial aid materials distributed to students and community members.

(xii) LEP Financial Aid Information:

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|---|--|-------------------------|--------------------------|
| E.iv | <p>Non-Compliance: The college has acknowledged it serves communities with limited English language skills however, none of the financial aid forms or informational brochures are available in these languages. In addition, department staff members did not have set procedures to serve students who were not proficient in English if they were unable to find a co-worker or student for interpretation.</p> | <p>This work is in progress and several meetings have been convened to address this finding. The VPSA worked with the Institutional Research Office (IRO) to identify (using U.S. Census data) the top 4 non-English languages spoken in its service area. The top four languages include Spanish, Russian, Chinese, and Vietnamese. (see A.iii).</p> <p>The college's Financial Aid Office (FAO) has already started the process of identifying and prioritizing FA forms for translation in these languages. For example, the Director of Financial Aid researched and identified several federal financial aid documents</p> | <p>Vice President for Student Affairs and Director of Financial Aid</p> | <p>February 2021 (Work is in progress, but as stated under the resolution section this effort requires coordination between multiple offices and Spokane Community College.)</p> | | |

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| | | <p>that already been translated (most often in Spanish). These forms are readily accessible to all post-secondary institutions.</p> <p>Since all of the financial aid forms are utilized by both colleges in the district, the college will work with Spokane Community College and the Marketing and Business/Purchasing offices to secure translation services.</p> | | | | |
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Required Action:

The college should adopt a method to determine what communities of individuals with limited English language skills it serves and make financial aid information and forms available in those languages. In addition, the college should periodically reassess its community to determine if there are changes in the demographics to ensure financial aid information is available to all community members who are not native English speakers. Finally, the college should establish and distribute guidelines on how students should communicate with individuals with limited English proficiency, to include instructions on when an official versus an informal interpreter is appropriate, and how to access translation and interpretation services when required.

F COUNSELING AND PREVOCATIONAL PROGRAMS

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

(ix) Counseling Materials & Activities:

Recipients must ensure that counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|---|--|---|-------------------------|--------------------------|
| F.i | <p>Non-Compliance: A review of the college’s promotional and recruiting materials, and a review of policies and procedures, found no indication of discrimination in counseling materials however, interviews with students, staff and faculty found that the college has a severe shortage of qualified counselors which disproportionately affects students from protected groups, non-traditional students, and individuals from minority populations.</p> <p>The shortage and need for additional counseling services was mentioned as an issue by almost every individual interviewed and was especially concerning for the counseling staff who did not have the time or capacity to provide the quality and amount of services they believed were necessary to help students succeed. The counselors stated the limitations in their ability to serve students was disproportionately affecting non-traditional and first-generation students, as well as those from</p> | <p>As a Guided Pathways college, SFCC had already started the redesign process for access to services, (i.e. orientation and academic counseling) for all students. The college’s Get on the Path workgroup designed an online orientation that is accessible and mandatory for all new. The group also worked with the Counseling Department and faculty advisors to create individualized and personalized pre-entry advising sessions. Both the mandatory orientation and pre-entry advising will launch spring (April) 2020. It is also important to note that, SFCC is in the top percentile of good/recommended</p> | <p>VPSA and Dean of Student Support Services</p> | <p>February 2021 (to make certain both orientation and advising are in compliance)</p> | | |

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| | <p>various protected groups. Interviews with students, found the shortage has resulted in students taking unneeded classes, taking repeated placement tests, and other issues. Student interviewees complained about the long waiting periods and receiving incorrect and conflicting information from untrained staff providing informal counseling services. Since the college requires new students to receive academic counseling, this shortage has also created a bottle neck at certain times and has been a source of frustration for both students and staff.</p> <p>Due to this shortage, some of the college's faculty have taken on counseling, but due to their lack of training in many areas, this has increased frustration for some students. Several students interviewed stated they had received incorrect information from their first faculty advisor, but once they found a faculty member in their specific program, they had received more timely and correct information.</p> | <p>faculty counselor-to-student ratio based on a recently published report by the State Board. (published in 2020)</p> <p>The college has a rich history of continuous improvement of its advising services. For example, in 2015, the college received a Welty grant to conduct research on best and emerging advising practices in support of creating a zero to completion advising model. And by the conclusion of that grant, in 2018 the college was awarded a Title III grant (based on its Welty research) to continue its advising work in support of Guided Pathways with a focus on capacity building by providing professional development for faculty advisors. To date, the college has established it professional</p> | | | | |
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| | | <p>development series for faculty advisors, and there are two pilot cohorts. Each quarter the number of faculty participating in each cohort will increase to help build capacity for advising at SFCC. The pilots are designed to equip faculty advisors with the tools and resources they need to assist with faculty advising/faculty mentoring in a zero-to-completion-based model. Please see 'Appendix B' for an outline of the faculty advisor syllabus/curriculum. The college is also launching pathway-specific student success courses that will include academic advising as a cornerstone to student success. This course will also support building capacity for the college's zero to completion advising model.</p> | | | | |
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Recommendation:

Students and employees interviewed suggested the college consider making orientation and academic counseling mandatory for all students. They pointed out that individuals returning to school after an extended period of time and transfer students from other institutions often needed the information provided at these sessions. In addition, interviewees stated knowing the campus and having basic information was helpful in making students feel more included and confident.

(x) Directing or Profiling:

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular field or program or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xi) Directing Toward Restrictive Career:

Recipients may not counsel disabled students toward more restrictive career objectives than non-disabled student with similar abilities and interests.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| F.iii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xii) Disproportionate Enrollment:

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|--|---|------------------------|--|------------------|-------------------|
| F.iv | <p>Non-Compliance: The review found the college's population of Hispanic/Latino, Asian, and Native American/Pacific Islander students, as well as individuals with a disability, was significantly below average when compared to demographics of the surrounding population.</p> | <p>This work is in progress to address this finding for multiple reasons. First, SFCC was a pilot school for ctcLink back in 2014, and one of the many glitches with the system included capturing/reporting of race/ethnicity data. The college reported this (and other issues) issue to SBCTC via the ticketing system as early as 2015 and as recently as January 2020. The lack of data impacted the college's ability to prioritize, provide targeted services to marginalized populations, and make other informed decisions. Since the matter has been resolved per SBCTC, the college recently submitted a TRIO/SSS grant proposal to support historically minoritized students,</p> | VPSA | <p>February 2021 (Work is in progress, but as stated under the resolution section this effort requires coordination between multiple offices and Spokane Community College.)</p> | | |

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| | | <p>students living with disabilities, and low income, first generation students.</p> <p>As previously stated, the college has worked with the District Marketing department and Spokane Community College to identify the recruitment and promotional materials that need to be translated to the top four languages spoken in the college's service areas. (see C.i)</p> <p>The college is also working on outlining an informal and formal process for interpretation services. (see C.vi)</p> <p>Each of the abovementioned actions will ensure that the college is not causing or contributing to disproportionality by supporting the college's efforts to assist students from historically minoritized and</p> | | | | |
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| | | <p>marginalized backgrounds.</p> <p>The number of students with disabilities at SFCC compared with peer institutions are slightly lower. According to our DSS Director, there are two primary contributing factors: 1) a limited definition of disability still exists in our student community, particularly; and 2) the equity focus in Guided Pathways development has revived universal design as a readily achievable tool. Moreover, one solution already in action this spring (2020): DSS worked with faculty development and the Deans to create a refreshed syllabus statement that helps educate and expand the definition of disability for the whole community, including students.</p> | | | | |
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| | | <p>The numbers in ctcLink are about 100 students higher than those served by the office for the same factors listed above. Additionally, the classroom furniture at SFCC tends to be modular chair and table configuration rather than traditional student desk. This reduces requests for ergonomic furniture placement.</p> | | | | |
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Required Action:

The college should examine its recruitment, enrollment, and marketing practices, as well as its student service and academic programs, to ensure they are not causing or contributing to this disproportionality.

G SERVICES FOR STUDENTS WITH DISABILITIES

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

(xix) SWD Access to Programs:

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.i | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xx) Equipment Barriers:

Disabled students must not be excluded from vocational career or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xxi) Postsecondary 504 Services:

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete the degree program and/or licensure requirements.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.iii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xxii) Services for Students with Disabilities:

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.iv | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xxiii) Evaluation Accommodations & Modifications:

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students aptitude or achievement levels or other relevant factors are measured and not the disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.v | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xxiv) Equitable Housing Opportunities:

Students receive equitable opportunities from housing programs regardless of sex, national origin, color, race, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.vi | Not Applicable – The college does not have dormitories and does not provide housing. | Not applicable | | | | |

(xxv) Comparable & Accessible Housing:

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| G.vii | Not Applicable – The college does not have dormitories and does not provide housing. | Not applicable | | | | |

(xxvi) Off-Campus Housing:

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their race, sex, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|---------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| G.viii | Not Applicable — The college does not provide off-campus housing | Not applicable | | | | |

(xxvii) Landlords:

The institution does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| G.ix | Not Applicable — The college does not cooperate or work with any landlords | Not applicable | | | | |

H ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities are inaccessible to or unusable by persons with disabilities. Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) — must ensure each program is fully accessible.
- Between 6/4/1977 — 1/17/1991 — new construction must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: new construction must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: new construction and alterations must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).
- Between 9/15/2010 and 3/15/2012 — may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: new construction must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

See Attachment A for results of review.

J COMPARABLE FACILITIES

Separate changing rooms, showers, and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male and female students should be located in similar proximity to the associated classroom, shops, or laboratories.

See Attachment A for results of review.

K WORK STUDY, COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICE TRAINING

An educational institution not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of a student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. The institution should periodically

review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(v) Work Study & Job Placement:

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|---|--|----------------------|------------------------|-------------|------------------|-------------------|
| K.i | The review did not find any evidence of a violation. | | | | | |
| <p>Required Action:</p> <p>The college should take steps to ensure all individuals involved in selection, screening and supervision of student employees and interns are aware of applicable employment requirements and human resource laws to ensure opportunities are available to all qualified candidates. In addition, the college should take steps to monitor hiring practices and selections of student employees ensure no patterns of discrimination exist or that any individual practices can be construed as discriminatory.</p> | | | | | | |

(vi) Employer Agreements:

A recipient that assists employers or prospective employers in making employment opportunities available to students must ensure the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, and/or pay.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| K.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

L APPRENTICESHIP TRAINING PROGRAMS

In the same way that an employer may not discriminate and the educational agency may not work with any that discriminate, the educational agency also has the responsibility to ensure that entities sponsoring apprenticeship programs, such as unions, do not

discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of a student. Written agreements are recommended wherein the apprenticeship program indicates it will not discriminate on these bases. The agency should review apprenticeship assurance forms, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(iii) Apprenticeship Agreements:

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. A written agreement between the institution and the labor union or other sponsor should include an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| L.i | Not Applicable-The college does not offer any apprenticeship opportunities. | Not applicable | | | | |

M EMPLOYMENT

Recipients are prohibited from engaging in any employment practices that discriminate against employees or applicants for employment on the basis of sex, disability, race, color, or national origin. These specific prohibitions include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

(ix) Employment Practices:

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
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| <p>M.i</p> | <p>Non-Compliance: The review found no evidence of non-compliance in the general employment practices of the college for faculty and staff. The college has policies and procedures in place to ensure that there is no discrimination or appearance of discrimination in general employment. However, the college does not follow these guidelines and practices for students. Student employment at the college is managed by individual departments without any oversight or guidance from HR. Those supervising student employees and working with students do not receive any training or information on best practices, supervision, and/or civil rights laws. The screening process, questions asked of applicants, and the materials used during the process of selecting student candidates is created by individual supervisors and is not reviewed or screened by the college's human resource department, which put both the college and student employees at risk of possible actual or perceived discrimination.</p> | <p>This work is in progress. The VPSA met with the Director of Financial Aid, Associate Director of Work Study program, and Program Support Specialist for the work study program. Currently, the Human Resources Office requires screening training for all employees. Moreover, the work study/student employment office require supervisory trainings for all employees seeking work study employees in their areas. The work study/student employment trainings are offered via PowerPoint presentation (no group or in person one-on-one unless requested trainings) and employees have to acknowledge that they completed the training (similar to CCS HR trainings). See appendices (Work study) for contents.</p> | <p>VPSA and Director of FA</p> | <p>February 2021 (This finding will require coordination between SFCC and SCC, as well as the District Office (namely HRO))</p> | | |
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| | | <p>The office tracks certain work study employee information such as age and gender to ensure bias and discriminatory hiring practices are not occurring. The Work Study Office also utilizes the CCS Administrative procedures to guide their work.</p> <p>The agreed upon next steps include:</p> <ul style="list-style-type: none">*The college will provide annual training of employees who seek to hire work study employees. This training will cover the screening and selection process and be offered in person and online for those unable to attend scheduled sessions.*The college will develop a list of suggested interview questions databank (similar to CCS HR) for supervisors to ask.*A standardized application with non- | | | | |
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| | | <p>discrimination statement or link to full statement if condensed/shorted statement is used. *Annual review of data for selected work study employees such as age, gender, race/ethnicity, etc., when available to ensure bias and discriminatory hiring practices are not occurring.</p> <p>Both the Associate Director and Program Specialist will be receiving additional training on labor relations/HR laws and regulations due to the nature of their work. SFCC will meet with Spokane Community College to ensure consistency in trainings and practices across the district.</p> | | | | |
| Required Action: | | | | | | |

The college should consider establishing a more formal process for the screening, selection, and management of student employees and/or take measures to ensure those involved in the process of screening, selecting and supervising students are properly trained. Recommended steps should include training supervisors of students on prohibited practices, use of standardized applications and interview questions, etc. In addition, the college should consider monitoring student hires by division or supervisor to ensure there are no patterns that could indicate possible discrimination or bias.

(x) Employment Recruitment Notification:

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| M.ii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xi) Salary Scales & Assignments:

An organization should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| M.iii | The review did not reveal any evidence of a violation. | Not applicable | | | | |

(xii) Equal Opportunities & Reasonable Accommodations:

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship and therefore be unreasonable.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| M.iv | The review did not reveal any evidence of non-compliance. | Not applicable | | | | |

ATTACHMENT A

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|-----------|----------------------------|------------|-----------------------|-------------|-----------------|--------------|
| 08 | Accessibility | | | | | |
| | Compliance during visit? | No | | | | |
| ID | Evidence of Non-Compliance | Resolution | Person(s) Responsible | Target Date | Completion Date | Confirm Date |

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|-----|--------------------------|---|--|--|--|--|--|
| S-1 | Tracking Number | ADA0536 | | | | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (172A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Humanities | | | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | | | |

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| | Notes | Exterior door to back stage area has a 3" transition. | | | | | |
| S-2 | Tracking Number | ADA0542 | | | | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (172A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Slope | | | | | |
| | Near Building | P.E. Annex | | | | | |
| | Non-Compliance | The sidewalk slope is too steep. | | | | | |
| | Required Action | An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided. | | | | | |
| Notes | Route from accessible parking spot has six percent slope. Can move spot to flat portion of lot. | | | | | | |
| S-3 | Tracking Number | ADA0554 | | | | | |
| | Campus | Main Campus | | | | | |

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|-----|--------------------------|--|--|--|--|--|
| | Location | Site - Main Campus (172A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Site Access route | | | | |
| | Component | Ramps | | | | |
| | Parameter | Slope | | | | |
| | Near Building | Gymnasium | | | | |
| | Non-Compliance | The access ramp is too steep. | | | | |
| | Required Action | The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches. | | | | |
| | Notes | Slope is 5.7 degrees at mid-pount of ramp. | | | | |
| S-4 | Tracking Number | ADA0561 | | | | |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (172A) | | | | |

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|-----|--------------------------|---|--|--|--|--|--|
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Walks / paths | | | | | |
| | Parameter | Change in level | | | | | |
| | Near Building | Technical Arts | | | | | |
| | Non-Compliance | The path has a change in level that exceeds the allowable amount for an accessible route. | | | | | |
| | Required Action | Modify the path so that the change in level meets the accessibility requirements. | | | | | |
| | Notes | Transition at northwest building entrance 1". | | | | | |
| S-5 | Tracking Number | ADA0568 | | | | | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (172A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Site Access route | | | | | |
| | Component | Ramps | | | | | |
| | Parameter | Slope | | | | | |

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| Near Building | Library | | | | | |
| Non-Compliance | The access ramp is too steep. | | | | | |
| Required Action | The access ramp must be modified to less than 1:12 slope. If there are space limitations, then the ramp slope must be less than 1:10 if the rise of less than six (6) inches or the slope must be less than 1:8 if the rise is less than three (3) inches. | | | | | |
| Notes | The upper portion of the ramp at the north entrance has a 7 percent slope. It may be possible to modify the staff entrance near the west building elevator to provide an accessible route to the Library for students. If this is possible, a directional sign must be installed at the non-compliant ramp directing | | | | | |

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| | students to the compliant ramp. | | | | | |
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ATTACHMENT D
GRAYS HARBOR COLLEGE

State Board for Community and Technical Colleges
Civil Rights Compliance Review
Letter of Findings



Grays Harbor College
April 13, 2020

FOREWORD

The Methods of Administration (MOA) Coordinator for the State Board for Community and Technical Colleges (SBCTC) performed an on-site review of Grays Harbor College (the “college” or GHC) during the week of March 2 thru March 6 of 2020. As a recipient of federal financial assistance, Grays Harbor College is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) requires each state agency responsible for administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs that receive federal assistance from the U.S. Department of Education. The purpose of the on-site review is to determine the college’s compliance with the guidelines and the following federal laws and regulations:

- Title VI of the *Civil Rights Act of 1964* (Title VI) and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 (Title IX) and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the *Rehabilitation Act of 1973* (Section 504) and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the *Americans with Disabilities Act of 1990* (Title II) and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

While it was not the purpose of this review to assess the college’s compliance with Washington State civil rights laws and regulations, the college should also be aware of these requirements, which are contained in [Chapter 49.60 RCW](#) and [Title 162 WAC](#).

Please note that although the resolutions to the items noted in the Letter of Findings (LOF) will complete the college’s obligations in regards to this review, compliance with civil rights requirements is an ongoing obligation requiring continued internal monitoring and effort. Furthermore, the ability of individuals to oppose discriminatory practices and to participate in OCR investigations and other proceedings is critical to ensuring equal educational opportunity in accordance with Federal civil rights laws. For this reason, recipients of Federal funds are prohibited from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Federal civil rights laws. Once a student, parent, teacher, coach, or other individual complains formally or informally to a school about a potential civil rights violation or participates in an OCR investigation or proceeding, the recipient is prohibited from retaliating (including intimidating, threatening, coercing, or in any way discriminating against the individual) because of the individual’s complaint or participation in the review.

Grays Harbor College was selected for review based on the State of Washington’s 2020-21’s Targeting Plan, which requires review of subrecipients with the highest disparities between their total enrollment and their Career Technical Education (CTE) enrollment on the basis of

race, sex, and disability. The targeting plan also uses other optional rating criteria for selection of colleges to be reviewed. These additional criteria include the length of time since a college was last reviewed, and disparities between total completion rates and CTE completion rates on the basis of race, sex, and disabilities.

This LOF summarizes SBCTC's findings in the following twelve major areas of review:

- KK. Administrative Requirements
- LL. Site Location and Student Eligibility Criteria
- MM. Student Recruitment
- NN. Admissions
- OO. Student Financial Assistance
- PP. Counseling and Prevocational Programs
- QQ. Services for Students with Disabilities
- RR. Accessibility
- SS. Comparable Facilities
- TT. Work Study, Cooperative Education, and Job Placement
- UU. Apprenticeship Training Programs
- VV. Employment

This LOF describes any finding of non-compliance for which corrective action is required. *The "Non-Compliance" sections of this letter require a response.* "Recommendations" do not require responses, but are intended to advise the college of ways the educational experience might be made more accessible to students in protected groups.

Please use the Voluntary Compliance Plan (VCP) template attached to provide the college's responses to findings of non-compliance. At a minimum, the VCP should address the following:

- How the college will remedy each item of non-compliance (*Resolution/Work Done* column);
- The identity and contact information for the individual responsible for completing the corrective action plan (*Person Responsible* column); and
- A target completion date (month and year) (*Target Date* Column).

Please note the other two columns are for use by SBCTC's MOA Coordinator when confirming the completion of the required corrective action. Finally, the completed VCP should be signed at the bottom by an individual at the college with sufficient authority to ensure all corrective actions noted are performed as described and by the target dates.

The completed VCP must be returned to SBCTC by **June XX, 2020**. If the college is unable to meet this deadline, please contact Maryam Jacobs, SBCTC's MOA Coordinator at (360) 704-4389 or [mjacob@sbctc.edu](mailto:mjacobs@sbctc.edu) as soon as possible to discuss an alternate completion date. Once the college's response has been submitted, SBCTC will review the VCP, and either

approve it as is, or will work with the college to ensure that the appropriate corrective action is taken to bring the college into compliance.

In each subsection below, the “Non-compliance” section is followed by the federal regulation citations. In the case of facilities, the regulations in effect at the time of building construction or alteration are cited.

Commendations

- ✓ In the previous year the college has experienced some significant and large upheavals and changes due to budgetary concerns. These changes have included changes in staffing, programs, and services, and have created anxiety for many members of the campus community. Despite these changes, interviews with staff, faculty, and students found that the college’s level of service has not been affected and the commitment of employees to support and serve students has not waived.
- ✓ Although the commitment of staff and faculty to student success was evident in all departments and divisions, students interviewed identified a few departments and areas as going the extra mile to assist and support students. The following are some of the divisions and employees that were singled out for their commitment by interviewees:
 - The Accessibility Services and Veteran’s Services coordinator was identified by several students as providing extra support and concern for students. Students who were veterans, noted that the coordinator had made the process of returning to college seamless. In addition, all students requiring accommodations stated that the process for requesting and receiving needed assistance had been easy and that they felt supported by the college’s disability coordinator. The ability to provide this level of service is especially commendable as many staff and faculty noted that relationships between the Accessibility Center and various sections of campus had been strained in previous years and that the new coordinator had worked tirelessly since being hired last year to improve these relationships.
 - Another area of the college mentioned by students as providing exemplary services was the college’s Transition Programs division. Interviews with student enrolled in English language classes noted that the staff and faculty of the division provide wrap around services to attendees and have made themselves available to assist and support students in any manner possible. In addition, to better serve students in basic education classes and promote programs, the employees of the center work closely with surrounding communities and community leaders. The division also provides a separate orientation, information and a website in Spanish, childcare services for some classes, and classes in remote locations.
 - The services and assistance provided by the college’s Writing Center was also mentioned specifically by several interviewees. Students stated that the center employees went above and beyond to assist students and to provide support.
- ✓ In response to student and community member concerns pertaining to new “public charge laws”, the college’s Transition Center took the step of researching these new

guidelines and creating informational handout in both English and Spanish to assist those with concerns. This information was distributed to students to in an effort to ease anxiety.

- ✓ The college has created a thoughtful and detailed Best Practices Hiring Guide for the process of advertising, screening, and hiring candidates. The guide is designed to ensure those involved in the process of selecting candidates are impartial, transparent, and perform their duties in a manner that encourages hiring the most qualified candidates from diverse backgrounds.
- ✓ Despite its limited resources and lack of a marketing department, the college has used a committee to create a thoughtful marketing plan that is designed to reach a wide range of groups. The college is in a very small and homogenous community providing limited opportunity for outreach to minority groups. Despite these circumstances, the college has found events and methods to market to Native American, Hispanic/Latino, and other minority groups.

Section A-Administrative

Recipients must have certain basic requirements in place to comply with Department of Education's Office of Civil Rights (OCR) Guidelines, Title VI, Title IX, Section 504 and Title II. These basic procedures include the following: an annual public notice; continuous non-discrimination notification; designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II; and a grievance procedure that will allow students an avenue for dealing with alleged discrimination. To verify these, we reviewed numerous documents and electronic material, and conducted interviews with administrators, Title IX and Section 504 coordinators, students, staff and faculty.

A.i - Continuous Notification

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the college that the college does not discriminate on the basis of race, color, national origin, sex, disability or age.

Non-Compliance:

A review of a sample of the college's forms, advertisements and other printed material, as well as the college's website, found GHC does not include the required nondiscrimination statement in printed material or on its website as required.

The college's main website does not include a link to the nondiscrimination statement, and the information is not included in the Student's Rights section of web. A search of the website for nondiscrimination information found it was only included on the Human Resource page, and as a policy in the "Operational Policies and Administrative Procedures" section.

A review of 38 forms, advertisements, and other printed materials found 28 items did not include a nondiscrimination statement, 6 items included a non-discrimination statement that used the word gender instead of sex as a protected category, and finally, 10 statements included all protected categories, but did not include coordinator information.

Criteria:

28 CFR § 35.106 – A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

34 CFR §100.6(d)- Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §104.8(a) – A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a)... “Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications.”

34 CFR §104.8 (b) – If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

34 CFR §106.9 – (a) Notification of policy. (1) Each recipient shall implement specific and continuing steps to notify applicants for admission and employment, students and parents of elementary and secondary school students, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient, that it does not discriminate on the basis of sex in the educational program or activity which it operates, and that it is required by title IX and this part not to discriminate in such a

manner. Such notification shall contain such information, and be made in such manner, as the Assistant Secretary finds necessary to apprise such persons of the protections against discrimination assured them by title IX and this part, but shall state at least that the requirement not to discriminate in the education program or activity extends to employment therein, and to admission thereto unless Subpart C does not apply to the recipient, and that inquiries concerning the application of title IX and this part to such recipient may be referred to the employee designated pursuant to §106.8, or to the Assistant Secretary. (2) Each recipient shall make the initial notification required by paragraph (a)(1) of this section within 90 days of the effective date of this part or of the date this part first applies to such recipient, whichever comes later, which notification shall include publication in: (i) Local newspapers; (ii) Newspapers and magazines operated by such recipient or by student, alumnae, or alumni groups for or in connection with such recipient; and (iii) Memoranda or other written communications distributed to every student and employee of such recipient. (b) Publications. (1) Each recipient shall prominently include a statement of the policy described in paragraph (a) of this section in each announcement, bulletin, catalog, or application form which it makes available to any person of a type, described in paragraph (a) of this section, or which is otherwise used in connection with the recruitment of students or employees. (2) A recipient shall not use or distribute a publication of the type described in this paragraph which suggests, by text or illustration, that such recipient treats applicants, students, or employees differently on the basis of sex except as such treatment is permitted by this part. (c) Distribution. Each recipient shall distribute without discrimination on the basis of sex each publication described in paragraph (b) of this section, and shall apprise each of its admission and employment recruitment representatives of the policy of nondiscrimination described in paragraph (a) of this section, and require such representatives to adhere to such policy.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscrimination on their main website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, and/or employees. The nondiscrimination statement on the college's main webpage should be in a location that can be accessed with one click.

To meet OCR requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. The statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name/title, address, and telephone number. An email address is not currently required but encouraged. OCR requires coordinator(s) be identified by name on the college's website however, use of title only is allowed in printed material.

Department of Education's OCR requires all nondiscrimination statements to include six protected categories; race, color, national origin, sex, disability and age. The work gender cannot be substituted for sex.

A.ii Title IX/Section 504/Title II Coordinators

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. The coordinator's actual name is required on the college's website however, for printed materials use of the coordinator(s) title is sufficient.

Non-Compliance:

The college has designated coordinators for Title IX, Title II and Section 504 as required, but does not include up-to-date information on coordinators on its website and all required printed material.

In addition, interviews with staff and students found a large portion of interviewees did not know the identity of the college's Title IX Coordinator.

Criteria:

28 CFR §107(a) – Designation of responsible employee. - A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph.

34 CFR §104.7(a) – Designation of responsible employee. A recipient that employs fifteen or more persons shall designate at least one person to coordinate its efforts to comply with this part.

34 CFR §106.8(a) – Designation of responsible employee. Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to such recipient alleging its noncompliance with this part or alleging any actions which would be prohibited by this part. The recipient shall notify all its students and employees of the name, office address and telephone number of the employee or employees appointed pursuant to this paragraph.

34 CFR §100 Appendix B IV.O (Guidelines)– Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be

disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy on its website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials made available to participants, students, applicants, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee(s) responsible for coordinating compliance efforts. Inclusion of an email address is encouraged, but not required at this time.

In addition, the college should take measures to better distribute information on the identity of the college's coordinators and how they can be contacted on a regular basis. Step to disburse this information can include use of emails, posters and handouts around campus, and training sessions.

Recommendation:

Currently the duties of Title IX coordinator are not included in the job description of the college's Title IX coordinator. In interviews, the coordinator stated that she receives all the support and training required to perform her duties however, it is recommended these duties be included in the coordinators job description to ensure continued support, training opportunities, and resources for the position, even in cases of changes in executive leadership and priorities.

A.iii Annual Public Notification

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members, and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and disabled individuals. A brief summary of the program offerings and admission criteria should be included in the annual announcement, as well as the name, address and telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to ensure that lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Non-Compliance:

Grays Harbor College did not publish an annual non-discrimination notice at the beginning of the 2019 Fall term as required.

Criteria:

34 CFR §100.6(d) – Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §100 Appendix B IV.O (Guidelines) – Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications, and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English f skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term. The notification should include a brief summary of the college's program offerings, admission criteria, and the name(s) and title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that will reach students, employees, applicants, the public, and communities of national origin minority with limited English language skills in the area. Distribution of the notice on the college's main website is acceptable.

In addition, since the college has acknowledged that its service area includes one or more "communities of national origin minority persons with limited English language skills", it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them.

A.iv Grievance Procedure

A recipient shall adopt and publish grievance procedures to provide for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

The investigation did not reveal any evidence of a violation.

The review found the college has an adopted and published grievance procedure as required.

Recommendation:

Interviews with staff and faculty involved or aware of recent Title IX investigations, as well as the college's coordinators, found that the college should consider dedicating more resources to Title IX investigations and awareness programs. The interviews indicated that although the college has been able to meet its obligations to date, these same resources may not be sufficient to meet future needs.

A review of investigations and complaints for the last two years found the college has been able to respond to all complaints however, it is evident that the number, severity and investigation time for complaints and investigations have been increasing. Interviewees noted that the college has a limited number of individuals trained to investigate complaints, and due to several complicated and difficult recent investigations, some of these individuals were unwilling to continue performing the work. In addition, with recent staffing changes and increases in workload, staff may be unable to perform investigations.

It is recommended the college examine staffing and resources available to ensure the college to ensure resources required to manage future complaints are available. Among possible steps are use of staff from other institutions, an increase in trained investigators, and use of trained staff in more strategic manner based on workloads.

Section B - Site Location and Student Eligibility Criteria

Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability.

Issues that could result in discrimination or segregation include the selection of certain sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, color, national origin, sex, or disability.

B.i Student Eligibility

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminates on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocational education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

The investigation did not reveal any evidence of a violation.

Per Washington State law, the college has an open enrollment policy and is open to all qualifying individuals. No restrictions to admissions are in place.

B.ii Site Selection and Modifications

Recipients may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin, sex, or disability. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

The investigation did not reveal any evidence of a violation.

The review did not find any evidence that a facility or site could have the effect of excluding, segregating, or otherwise discriminating on the basis of an individual's membership in a protected group.

B.iii Residency

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The college does not have attendance zones and does not exclude students based on geographic boundaries.

Section C - Recruitment

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should include individuals from different races, colors, national origins, sexes, and disabilities.

C.i Recruitment Activities

Recipients must conduct their recruitment activities so as to not exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

Despite the college's remote location and small surrounding community, a review of the college's past and planned recruitment activity and marketing materials found GHC is making efforts to reach individual in minority groups.

Recommendation:

- Employees interviewed stated that recruitment targeting young adult' high school graduates is a missed opportunity for the college. Interviewees noted that due to the socio-economic of the surrounding community many younger adults never consider college and are not aware of opportunities available. These individuals are often working in low paying jobs without many opportunities for advancement and would greatly benefit from career and technical programs.
- Another suggestion for recruitment provided during interviews was creating and promoting stackable certificates and certification programs in general. Interviewees noted that programs that provided stackable certifications created a sense of accomplishment for students and allowed them to be exposed to better career opportunities in the short-term as they pursued further training. Students involved in career and technical programs also stated that they would like more information on certification programs available that would enhance their marketability and compliment their training. One student stated that she had heard the campus offered flagger certification classes and felt the training would greatly enhance her job prospects while she was attending college, but she had been unable to find information on the class. The student added that many other students would also be interested in such non-credited training opportunities (*an examination of the college website found the classes are offered as a community education class*).

C.ii Recruitment Materials

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disabilities.

The investigation did not reveal any evidence of a violation.

Our review found no evidence that any recruitment material's descriptions of opportunities had the purpose or effect of excluding a protected group.

C.iii Recruitment Teams

To the extent possible, recruiting teams should represent persons of different races, colors, national origins, sexes, and disabilities.

The investigation did not reveal any evidence of a violation.

The college does not have a marketing department and only one bi-lingual employee has the duties of recruitment as part of their job description. The college's marketing functions are overseen by a five-member committee that ensures a variety of representatives of different sexes, races, colors, and national origins attend marketing functions, as well as bi-lingual employees and volunteers for Spanish speaking community members.

C.iv Counseling Limited English Proficiency (LEP)/Sensory Impairments

Recipients must ensure that counselors can effectively communicate with individuals with limited English proficiency and sensory impairments.

Non-Compliance:

The college is taking steps to recruit and market programs to Spanish speaking community members. These efforts include offering a website on English language programs in Spanish, radio advertisements in Spanish, and outreach to the Spanish speaking community by attending various event. Despite these marketing efforts, the college's ability to serve Spanish speaking individuals on campus is limited.

The college's Transition Center and Student Services have staff members who are fluent in Spanish, and able to provide limited assistance to students that are native Spanish speakers. The college staff usually refer individuals with limited English skills to the Transition Center where every effort is made to assist the student regardless of their native language. However, community members do not always find their way to the Transition Center. In addition, interviews with employees and students revealed that other areas of the college have limited resources and ability to provide counseling services to individuals with limited English language skills.

Interviews also found that due to the college's recent budgetary shortfalls, many divisions are not fully staffed and that most employee's workload has recently increased a great deal. Since providing interpretation services is not a job requirement and/or an assigned duty for Spanish speaking staff, helping students often creates difficulties for these staff members and increases their workload.

Criteria:

34 CFR §100.3 – (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege

enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B IV.L (Guidelines) – *Recipients may not restrict an applicant's admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction. Acceptable methods of identification include: (1) Identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary. Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.*

34 CFR §100 Appendix B IV.O (Guidelines) – *Recipients must insure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.*

Required Action:

The college should take steps to ensure individuals involved in recruitment, counseling, and student services have the necessary tools and resources to communicate effectively with all community members. In addition, the college should periodically re-evaluate its community to determine if there are changes in demographics and if resources should be designated to serve additional communities.

If services of bi-lingual employees for interpreting is required, the college should establish and distribute guidelines on how individuals who are not proficient in English will be served, and make interpretation services part of bilingual employee's job duties. Guidelines should also include directions notifying employees when an informal interpreter is not appropriate, and how to access translation and interpretation services.

Recommendation:

Although the college has worked to provide many services to Spanish speaking community members and offer a large number of publications and materials in Spanish, many student and staff members felt more could be done to better serve these community members. It is recommended the college continue translating hand-outs, brochures, forms, and other documents to Spanish and to continue to find ways to serve individuals that are not proficient in English.

C.v Promotional Efforts

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex, or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustration.

Non-Compliance:

The review found that some pictures and illustrations used to promote and advertise career and technical program (CTE) did not include individuals from varying backgrounds and appeared to perpetuate stereotypes. The pictures used on the college's website for the Carpentry, Automotive, and Diesel Technology only contained pictures of males and mostly Caucasian males. In addition, all testimonials of prior students used for these programs were by Caucasian males. In addition, pictures used for the nursing and early childhood education programs only depicted females.

Criteria:

34 CFR §100 Appendix B (Guidelines V.E) – Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents' night, shop demonstrations, visitation by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups traditionally have not been represented. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

Required Action:

The college should review pictures and illustrations contained in promotional and advertising material, and on its website, and ensure they portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities. The college should take measures to ensure material being used does not contain pictures that perpetuate stereotypes.

C.vi Service Area LEP

If a recipient's service area contains a community with persons of limited English proficiency, information must be available to that community in its native language.

Non-Compliance:

The college acknowledges that it serves Spanish speaking community members but offers a very limited number of recruitment materials in Spanish.

Criteria:

34 CFR §100.3 – (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefit provided under the program; (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section). (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B-V.E (Guidelines) -- Recipients may not undertake promotional efforts (including activities of school officials, counselors, and vocational staff) in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or handicap. Examples of promotional efforts are career days, parents' night, shop demonstrations, visitation by groups of prospective students and by representatives from business and industry. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations. To the extent possible they should portray males or females, minorities or handicapped persons in programs and occupations in which these groups traditionally have not been represented. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

34 CFR §100 Appendix B IV.L (Guidelines) -Recipients may not restrict an applicant's admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction. Acceptable methods of identification include: (1) Identification by administrative staff, teachers, or parents of secondary level students; (2) identification by the student in postsecondary or adult programs; and (3) appropriate diagnostic procedures, if necessary. Recipients must take steps to open all vocational programs to these national origin minority students. A recipient must demonstrate that a concentration of students with limited English language skills in one or a few programs is not the result of discriminatory limitations upon the opportunities available to such students.

Required Action:

The college should evaluate what communities of limited English proficiency it currently serves and begin the process of translating recruitment and promotional materials to those languages. In addition, the college should perform periodic assessments of the community it serves to determine if new groups and communities have moved to the area and to determine if materials should be offered in any other languages.

Section D - Admissions

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admission criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex, or disability, the criteria should be validated as being essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

D.i Discriminatory Criteria

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as being essential to participation.

The investigation did not reveal any evidence of a violation.

Our review found no evidence of any admission criteria excluding any individuals based on their membership in a certain group.

Recommendation:

- ✓ A review of admission requirement for several CTE programs, to include Automotive Technology, Carpentry, and Diesel Technology, found the programs required an interview with a faculty member and the faculty members permission to enroll. The review found no indication that this requirement was used to discriminate against

any group or to discourage individuals from enrolling in the program however, use of personal interviews could lead to perceptions of bias, especially during times when enrollment in programs is limited. In addition, the interviews could be perceived as a tool used to discourage some students from these programs, even when permission for enrollment has been granted. It is recommended the college ensure all staff interviews are conducted using the same questions and criteria, and that the college maintains data on any rejections to be able to demonstrate the selection process and acceptance in the program are performed in a non-discriminatory manner.

- ✓ In a large number of interviews with student, staff, and faculty, participants stated that the on-line orientation is not as effective and informative as live orientation. Interviewees felt the new format did not help students retain important information and was too lengthy. Many interviewees believed having a live orientation helped students build a connection with the college, meet various individuals available to assist them, and provided a platform to answer questions. Participants felt this connection reduced anxiety for new students and contributed to retention. In addition to changing the format, a large number of interviewees suggested making the orientation mandatory for all students, especially those returning to college after an extended period of time and older students. Interviewees also suggested offering classes teaching basic skills required to succeed in college, especially for individuals returning to school after a long absence.
- ✓ The college's demographics found that the rate of enrollment of Hispanic/Latino students in several CTE programs is significantly below the college's overall enrollment. The rate of Hispanic/Latino enrolled at the college is 14.7% however, the rate of enrollment for some CTE programs were as follows:
 - Forest Management – 0
 - Medical Office - 0
 - Human Services – 5.3%
 - Carpentry – 6.7%
 - Commercial Transportation – 7.7%

In addition, the college's Early Childhood Education program's enrollment was 100% female. Although the review did not find any indication of bias or discriminatory practices in recruitment, enrollment, and counseling, the college should examine its practices to ensure none of its policies, procedures, or practices are unintentionally contributing to these demographics.

D.ii Preadmission Inquiries

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

Non-Compliance:

A review of the college's paper Application for Admission (supplemental page) found the college is requesting the student's familial status under "What is your current family status).

Criteria:

34 CFR §106.21(c) (4) – A recipient shall not make pre-admission inquiry as to the marital status of an applicant for admission, including whether such applicant is “Miss” or “Mrs.”

34 CFR 104.42(b) (4) - Shall not make pre-admission inquiry as to the marital status of an applicant for admission, including whether such applicant is “Miss” or “Mrs.” A recipient may make pre-admission inquiry as to the sex of an applicant for admission, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part.

Required Action:

The college should remove any questions relating to student marital, parental and/or disability status from admission forms and applications. If information regarding a student’s status is required, the question can be included in forms completed by the student after acceptance to the college.

D.iii Disabled & Employment Limitations

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

The investigation did not reveal any evidence of a violation.

A review of materials and interviews with staff and students found no indication the college denies or limits students with disabilities from participating in any programs or courses.

D.iv LEP & Benefit Limitation

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

The investigation did not reveal any evidence of a violation.

Our review of demographics, interviews with staff, faculty, and students, and review of program descriptions found no indication admission to any vocational program is restricted due to limited English language skills.

D.v Preadmission Tests

Postsecondary admission’s tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal,

or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

The investigation did not reveal any evidence of a violation.

A review of applicable materials and documents, interviews with campus community members, and review of the college's website found all preadmission tests were standard industry tests used for placement. The review found no evidence tests are selected or administered in a way that could be discriminatory.

D.vi Disability Inquiries

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

The investigation did not reveal any evidence of a violation.

Review of admission forms, interviews with staff, students, and faculty, as well as the college's Associate Director of Accessibility and Veteran Services, found no evidence the college is making preadmission inquiries regarding disabilities.

Section E - Student Financial Assistance

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability, unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequest, or similar legal instrument or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, national origin, or disability.

E.i Financial Assistance Availability

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

The investigation did not reveal any evidence of a violation.

Interviews with staff and students, and review of documentation and demographic information found no indication financial assistance isn't distributed equitably to all students.

Recommendations:

- Interviewees noted that the college's financial aid department is low on staffing and that receiving assistance from the department is time consuming and difficult. In addition, interviewees stated the process for applying for financial assistance was overly complicated. Interviewees suggested the college consider ways to simplify the process, especially for individuals with limited English proficiency. In addition, community members also suggested the college consider ways to increase available staffing for the division during busy times.
- Several individuals participating in interviews recommended the college consider looking into scholarships and funding opportunities for undocumented students. Interviewees pointed out that the state has a large number of undocumented individuals that could use funding to pursue an education without personal risk.

E.ii Sex-Restricted Awards

Sex-restricted awards are made only when established by will, trust, bequest, or other legal instrument.

The investigation did not reveal any evidence of a violation.

A review of scholarships available through the college found none restricted by sex. For scholarships offered by the college's foundation, the review found a few in which preference is given to females, however all these awards are administered by the College's foundation and not the college and do not appear to have the effect of overall discrimination on the basis of sex. The review also found restricted award are being made due to the requirements of a will, bequest, or other legal instrument.

E.iii Equitable Financial Aid Information

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

Non-Compliance:

The review of financial aid information and materials distributed by the college and on the college's, website appear to be equitably written without any indication of bias however, the review found the majority of the material and forms providing information and used by the department do not include a non-discrimination notice.

Criteria:

34 CFR §100.3(a-b) – (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) Specific discriminatory actions prohibited: (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §100 Appendix B (Guidelines VI-B) – Student Financial Assistance- Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

34 CFR §104(a) and (b) – (a) General. No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or

separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service.

34 CFR §104.46 – (a) Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.

34 CFR §106.37 – (a) General. Except as provided in paragraphs (b) and (c) of this section, in providing financial assistance to any of its students, a recipient shall not: (1) On the basis of sex, provide different amount or types of such assistance, limit eligibility for such assistance which is of any particular type or source, apply different criteria, or otherwise discriminate; (2) Through solicitation, listing, approval, provision of facilities or other services, assist any foundation, trust, agency, organization, or person which provides assistance to any of such recipient's students in a manner which discriminates on the basis of sex; or (3) Apply any rule or assist in application of any rule concerning eligibility for such assistance which treats persons of one sex differently from persons of the other sex with regard to marital or parental status. (b) Financial aid established by certain legal instruments. (1) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign wills, trusts, bequests, or similar legal instruments or by acts of a foreign government which requires that awards be made to members of a particular sex specified therein; Provided, That the overall effect of the award of such sex-restricted scholarships, fellowships, and other

forms of financial assistance does not discriminate on the basis of sex. (2) To ensure nondiscriminatory awards of assistance as required in paragraph (b)(1) of this section, recipients shall develop and use procedures under which: (i) Students are selected for award of financial assistance on the basis of nondiscriminatory criteria and not on the basis of availability of funds restricted to members of a particular sex; (ii) An appropriate sex-restricted scholarship, fellowship, or other form of financial assistance is allocated to each student selected under paragraph (b)(2)(i) of this section; and (iii) No student is denied the award for which he or she was selected under paragraph (b)(2)(i) of this section because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex. (c) Athletic scholarships. (1) To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics. (2) Separate athletic scholarships or grants-in-aid for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with this paragraph and §106.41.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials, to include all financial aid forms and informational pamphlets made available to participants, students, applicants, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. This statement should be included on all financial aid materials distributed to students and community members.

E.iv LEP Financial Aid Information

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

Non-Compliance

The college has acknowledged it serves communities with limited English language skills however, none of the financial aid forms or informational brochures are available in other languages. In addition, the department does not have staff members proficient in Spanish.

Criteria:

34 CFR 100.3(a-b) – (a) **General.** No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies. (b) **Specific discriminatory actions prohibited:** (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin: (i) Deny an individual any service, financial aid, or other benefits provided under the program (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; (iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefits under the program; (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program; (v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirements or conditions which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program; (vi) Deny an individual an opportunity to participate in the program through the provisions of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section); (vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

34 CFR §104(a-b) – (a) **General.** No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) **Discriminatory actions prohibited.** (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified handicapped person an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified handicapped person with an aid, benefit, or service that is not as effective as that provided to others; (iv) Provide different or separate aid, benefits, or services to handicapped persons or to any class of handicapped persons unless such action is necessary to provide qualified handicapped persons with aid, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified handicapped person by providing significant assistance to an agency, organization, or person that discriminates on the basis of handicap in providing any aid, benefit, or service to beneficiaries of the recipients program or activity; (vi) Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards; or (vii) Otherwise limit a qualified handicapped person in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service.

34 CFR 100 Appendix B (Guidelines VI-B) -- Recipients may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. Recipients may administer sex restricted financial assistance where the assistance and restriction are established by will, trust, bequest, or any similar legal instrument, if the overall effect of all financial assistance awarded does not discriminate on the basis of sex. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

34 CFR §104.46 – (a) Provision of financial assistance. (1) In providing financial assistance to qualified handicapped persons, a recipient to which this subpart applies may not, (i) On the basis of handicap, provide less assistance than is provided to nonhandicapped persons, limit eligibility for assistance, or otherwise discriminate or (ii) Assist any entity or person that provides assistance to any of the recipient's students in a manner that discriminates against qualified handicapped persons on the basis of handicap.(2) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established under wills, trusts, bequests, or similar legal instruments that require awards to be made on the basis of factors that discriminate or have the effect of discriminating on the basis of handicap only if the overall effect of the award of scholarships, fellowships, and other forms of financial assistance is not discriminatory on the basis of handicap. (b) Assistance in making available outside employment. A recipient that assists any agency, organization, or person in providing employment opportunities to any of its students shall assure itself that such employment opportunities, as a whole, are made available in a manner that would not violate subpart B if they were provided by the recipient. (c) Employment of students by recipients. A recipient that employs any of its students may not do so in a manner that violates subpart B.

34 CFR §106.37 – (a) General. Except as provided in paragraphs (b) and (c) of this section, in providing financial assistance to any of its students, a recipient shall not: (1) On the basis of sex, provide different amount or types of such assistance, limit eligibility for such assistance which is of any particular type or source, apply different criteria, or otherwise discriminate; (2) Through solicitation, listing, approval, provision of facilities or other services, assist any foundation, trust, agency, organization, or person which provides assistance to any of such recipient's students in a manner which discriminates on the basis of sex; or (3) Apply any rule or assist in application of any rule concerning eligibility for such assistance which treats persons of one sex differently from persons of the other sex with regard to marital or parental status. (b) Financial aid established by certain legal instruments. (1) A recipient may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign wills, trusts, bequests, or similar legal instruments or by acts of a foreign government which requires that awards be made to members of a particular sex specified therein; Provided, That the

overall effect of the award of such sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex. (2) To ensure nondiscriminatory awards of assistance as required in paragraph (b)(1) of this section, recipients shall develop and use procedures under which: (i) Students are selected for award of financial assistance on the basis of nondiscriminatory criteria and not on the basis of availability of funds restricted to members of a particular sex; (ii) An appropriate sex-restricted scholarship, fellowship, or other form of financial assistance is allocated to each student selected under paragraph (b)(2)(i) of this section; and (iii) No student is denied the award for which he or she was selected under paragraph (b)(2)(i) of this section because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex. (c) Athletic scholarships. (1) To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics. (2) Separate athletic scholarships or grants-in-aid for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with this paragraph and §106.41.

Required Action:

The college should adopt a method to determine what communities of limited English language skills it serves and make financial aid information and forms available in those languages. In addition, the college should periodically reassess its community to determine if there are changes in the demographics and to ensure financial aid information is available to all community members who are not native English speakers. Finally, the college should establish guidelines and provide tools on how staff should communicate with individuals with limited English proficiency (i.e. use of a bi-lingual staff or student, use of an interpreter, etc.) to include instructions on when an official versus an informal interpreter is appropriate.

Section F – Counseling and Pre-Vocational Programs

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

F.i Counseling Materials & Activities

Recipients must ensure their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

Interviews with students and staff found that students often have difficulties finding academic counselors with time to assist them and often receive erroneous information from

counselors. The college only employs two full-time counselors who provide a wide range of counseling services to include academic, career, and mental health counseling. The majority of academic counseling is performed by faculty members as part of their collective bargaining agreement. Faculty members do not receive any training for this task. Interviews with staff and students found that although a large portion of those providing counseling services provide exemplary services to students, some are not as accommodating or properly trained for the task. Several students interviewed stated that they had received incorrect information from an advisor, which for some students led to taking unnecessary classes. In addition, some students complained that it was difficult to schedule advising appointments with some advisors. Many students added that when they finally found another advisor (usually a faculty member in their area of study), they were much happier with the assistance they received.

Since lack of adequate and qualified advisors disproportionately affects students from protected groups, non-traditional students, and individuals from minority populations this limitation in advising services could have the effect of discriminating on the basis of a student's membership in protected and/or minority group.

Criteria:

- 28 CFR 35.130 - General prohibitions against discrimination – (a) No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity. (b)(1) A public entity, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of disability— (i) Deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, or service; (ii) Afford a qualified individual with a disability an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others; (iii) Provide a qualified individual with a disability with an aid, benefit, or service that is not as effective in affording equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as that provided to others; (iv) Provide different or separate aids, benefits, or services to individuals with disabilities or to any class of individuals with disabilities than is provided to others unless such action is necessary to provide qualified individuals with disabilities with aids, benefits, or services that are as effective as those provided to others; (v) Aid or perpetuate discrimination against a qualified individual with a disability by providing significant assistance to an agency, organization, or person that discriminates on the basis of disability in providing any aid, benefit, or service to beneficiaries of the public entity's program;*
- (vii) Otherwise limit a qualified individual with a disability in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving the aid, benefit, or service. (2) A public entity may not deny a qualified individual with a disability the opportunity to participate in services, programs, or activities that are not separate or different, despite the existence of permissibly separate or different programs or activities. (3) A public entity may not, directly or through contractual or other arrangements, utilize criteria or methods of administration: (i) That have the effect of subjecting qualified individuals with disabilities to discrimination on the basis of disability; (ii) That have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the public entity's program with respect to individuals with disabilities; or*

(iii) That perpetuate the discrimination of another public entity if both public entities are subject to common administrative control or are agencies of the same State.

34 CFR 106.36 Counseling and use of appraisal and counseling materials – (a) *Counseling. A recipient shall not discriminate against any person on the basis of sex in the counseling or guidance of students or applicants for admission.*

34 CFR 104.4 Discrimination prohibited. – (b) *Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (2) For purposes of this part, aids, benefits, and services, to be equally effective, are not required to produce the identical result or level of achievement for handicapped and nonhandicapped persons, but must afford handicapped persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs. (4) A recipient may not, directly or through contractual or other arrangements, utilize criteria or methods of administration (i) that have the effect of subjecting qualified handicapped persons to discrimination on the basis of handicap, (ii) that have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the recipient's program or activity with respect to handicapped persons, or (iii) that perpetuate the discrimination of another recipient if both recipients are subject to common administrative control or are agencies of the same State.*

34 CFR 100 Appendix B (Guidelines V-A) -- *Counseling and Prevocational Programs - A. RECIPIENT RESPONSIBILITIES- Recipients must insure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or handicap. B. COUNSELING AND PROSPECTS FOR SUCCESS - Recipients that operate vocational education programs must insure that counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program based upon the student's race, color, national origin, sex, or handicap. Recipients may not counsel handicapped students toward more restrictive career objectives than nonhandicapped students with similar abilities and interests. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or handicapped students, recipients must take steps to ensure that the disproportion does not result from unlawful discrimination in counseling activities.*

Required Action:

The college should take steps to provide training to employees performing advising services. In addition, it is recommended the college take steps to better match students, based on their fields of study and interest, with faculty members in related programs to ensure information students receive is accurate and useful. Finally, it is recommended the college track student experiences and complaints to identify which faculty members may require additional training to better serve students.

Recommendation:

- ✓ In interviews with staff and faculty, interviewees noted that lack of oversight and middle management tasked with overseeing counseling has had an adverse effect on services. Due to staffing issues and the workload, current counselors are only able to perform day to day functions which leaves little time and space for improving services, long range planning, examining the quality and success of activities, and other tasks designed to improve the overall quality of services. As the quality of advising services has a significant impact on student retention and effects students from minority and protected groups disproportionately, it is recommended GHC consider looking into providing oversight for this area.

In addition to a need for middle management in counseling, some interviewees also shared their belief that middle management was needed for many other areas of the college. These interviewees pointed out that without oversight, the college would have a difficult time creating standards and procedures to improve processes, and to make changes required to streamline services on campus.

- ✓ A review of demographic data for the college found the rate of enrollment for Alaskan/ Native American individuals is significantly below its service area population. According to the US census bureau statistics, the Cities of Hoquiam and Aberdeen, and Pacific and Grays Harbor County, have a population of approximately 2.9% to 6.2% of Alaskan/Native American residents. The college's demographics for this group indicates only 2% of enrolled students are from this group.

As previously mentioned, the review found no indication of bias or discriminatory practices however, the college should review its marketing, admission, and advising services to ensure none of its services are unintentionally contributing to a low rate of enrollment for Alaskan/Native American individuals.

F.ii Directing or Profiling

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure counselors do not direct or urge any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

A review of program requirements for various programs, statistical information, and interviews with staff and students, found no indication students were being profiled or directed/steered to certain courses or programs.

F.iii Directing Toward Restrictive Career

Recipients may not counsel disabled students toward more restrictive career objectives than nondisabled students with similar abilities and interests.

The investigation did not reveal any evidence of a violation.

A review of various program requirements, interviews with staff and students, and review of enrollment statistics found no indication disabled students were being directed towards more restrictive careers.

F.iv Disproportionate Enrollment

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

The investigation did not reveal any evidence of a violation.

The review found no indication that any disproportionate enrollment at the college is a result of counseling services, or any other services and materials provided by the college.

Section G - Services for Students with Disabilities (SWD)

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

G.i SWD Access to Programs

No qualified person with a disability can be excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

The investigation did not reveal any evidence of a violation.

Interviews with the campus community, including the college's Accessibility Coordinator and students, found no indication any qualified person has been denied access or subjected to discrimination.

Recommendation:

- Data and information pertaining to disability services and the needs of students across the nation indicates that the number of students with disabilities and the myriads of disabilities diagnosed in the general population have been steadily increasing. These circumstances requires institutions of higher education to dedicate more and more resources to provide accommodations to students. In an interview with the college's Director of Accessibility Center, she noted that she has had to be very careful and conservative with her budget, but is concerned about her ability to meet the needs of students in the future. It is recommended the college consider the costs associated with providing on-going accommodations and plan to ensure sufficient resources are available to serve students with disabilities on an ongoing basis.
- A comparison of demographic data for the college's service area with the rate of enrollment for individuals with disabilities found the college's number of disabled students was significantly below its service area population. In accordance with the US census bureau statistics, the rate of individuals under 65 with disabilities for the Cities of Hoquiam and Aberdeen, and Pacific and Grays Harbor County, is between 13.9% and 20.4%. The college's demographics indicate 6.5% of student have a disability. The review found no indication of bias or discriminatory practices however, the college should review its marketing, admission, and advising services to ensure none of its services are unintentionally contributing to a low rate of enrollment for individuals with disabilities.
- Some interviewees noted that faculty and employees in academic divisions would benefit from training in disability laws, student's rights and obligations, and reasonable accommodations. These individuals noted that the college had recently created a policy regarding companion animals due to several prior incidents on campus which had revealed that many community members were unfamiliar with the differences between companion and service animals. These interviewees also noted that with the increase in emergence of non-visual disabilities, many faculty members could use tools to manage and better serve students with disabilities.

G.ii Equipment Barriers

Disabled students must not be excluded from vocational, career, or academic programs, courses, services or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

The investigation did not reveal any evidence of a violation.

A review of equipment, tools and resources found the college maintains an adequate supply of resources and tools to assist students with disabilities. Interviews with staff and students and review of various materials found no indication that disabled students were excluded or discouraged from participation in activities or services due to equipment barriers or lack of services.

G.iii Postsecondary 504 Services

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete the degree program and/or licensure requirements.

The investigation did not reveal any evidence of a violation.

The review found no indication of discrimination in academic programs. Interviews and review of documents found the college is taking appropriate measures to ensure participants have required modifications and adjustments to complete programs.

G.iv Academic Adjustment

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

The investigation did not reveal any evidence of a violation.

The review found the college is making necessary adjustments to meet the needs of students with disabilities.

G.v Evaluation Accommodations & Modifications

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes, achievement levels, or other relevant factors are measured, not the disability.

The investigation did not reveal any evidence of a violation.

A review of academic programs and requirements, as well as interviews with staff and students, found no indication course examinations or evaluations are administered in a manner designed to or with the effect of discriminating against those with disabilities.

G.vi Equitable Housing Opportunities

Students receive equitable opportunities to benefit from housing programs regardless of their sex, national origin, color, race, or disability.

Not Applicable

The college does not have dormitories and does not provide housing.

G.vii Comparable & Accessible Housing

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

Not Applicable

The college does not have dormitories and does not provide housing.

G.viii Off-Campus Housing

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their sex, race, color, national origin or disability.

The investigation did not reveal any evidence of a violation.

The College arranges off-campus housing services for students recruited for some athletic teams. The review found no indication of discrimination in these services.

G.ix Landlords

The college does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

Not Applicable

The college does not work with or refer students to any landlords.

Section H – Accessibility

Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) – must ensure each program is fully accessible.
- Between 6/4/1977 and 1/17/1991 – New construction - must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: New construction – must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: New construction and alterations – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).

- Between 9/15/2010 and 3/15/2012 – may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: New construction – must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

Section H is provided at the end of this document in Attachment A

Section J – Comparable Facilities

Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male and female students should be located in similar proximity to the associated classrooms, shops or laboratories.

Section J is provided at the end of this document in Attachment A

Section K – Work Study Cooperative Education, Job Placement, and Apprentice Training

An educational institution not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of a student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. The institution should periodically review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

K.i Work Study & Job Placement

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review did not find any indication of bias or discrimination in work study, cooperative education, and job placement programs.

K.ii Employer Agreements

A recipient that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, or pay.

The investigation did not reveal any evidence of a violation.

A review of sample agreements used by the college and outside employers providing students with opportunities, found the agreement contains the required language ensuring non-discrimination by the employer.

Section L - Apprentice Training Program

Colleges have the responsibility to take steps to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. Although not required, the college should consider having a written agreement whereby the apprenticeship program indicates it will not discriminate on these bases. The college should periodically review apprenticeship assurance forms or agreements, and the assignment of students presently in such programs to see whether any such patterns exist.

L.i Apprenticeship Agreements

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. A written agreement between the institution and the labor union or other sponsor should include an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

Non-Compliance:

The college is in a partnership with a pipe-fitter union for an apprenticeship program. The agreement is not in writing and candidates for the program are selected by the union. Candidates are required to pass an Electrical Training Alliance NJATC aptitude test to qualify for the apprenticeship. The employer states the pre-test satisfies the state's requirements for fair and equal treatment, however non-discrimination laws for employers does vary from requirements for educational institutes and as such, the college can not be certain that the selection process used for candidates meets Department of Education's criteria.

A review of demographics for the program found that all participants selected for the current year's program are Caucasian males, with the exception of one individual who did not disclose his gender.

Criteria:

34 CFR 100.3 - (c) *Employment practices.* (1) *Where a primary objective of the Federal financial assistance to a program to which this regulation applies is to provide employment, a recipient may not (directly or through contractual or other arrangements) subject an individual to discrimination on the ground of race, color, or national origin in its employment practices under such program (including recruitment or recruitment advertising, employment, layoff or termination, upgrading, demotion, or transfer, rates of pay or other forms of compensation, and use of facilities), including programs where a primary objective of the Federal financial assistance is (i) to reduce the employment of such individuals or to help them through employment to meet subsistence needs, (ii) to assist such individuals through employment to meet expenses incident to the commencement or continuation of their education or training, (iii) to provide work experience which contributes to the education or training of such individuals, or (iv) to provide remunerative activity to such individuals who because of handicaps cannot be readily absorbed in the competitive labor market. The following, under existing laws, have one of the above objectives as a primary objective: (A) Projects under the Public Works Acceleration Act, Pub. L. 87-658, [42 U.S.C. 2641-2643](#). (B) Work-study under the Vocational Education Act of 1963, as amended, [20 U.S.C. 1371-1374](#). (C) Programs assisted under laws listed in appendix A as respects employment opportunities provided thereunder, or in facilities provided thereunder, which are limited, or for which preference is given, to students, fellows, or other persons in training for the same or related employments.*

34 CFR 100.3 - (d) *Aid, benefits or services not provided by recipient.* (1) *This paragraph applies to any recipient which requires participation by any applicant, student, or employee in any education program or activity not operated wholly by such recipient, or which facilitates, permits, or considers such participation as part of or equivalent to an education program or activity operated by such recipient, including participation in educational consortia and cooperative employment and student-teaching assignments. (2) Such recipient: (i) Shall develop and implement a procedure designed to assure itself that the operator or sponsor of such other education program or activity takes no action affecting any applicant, student, or employee of such recipient which this part would prohibit such recipient from taking; and (ii) Shall not facilitate, require, permit, or consider such participation if such action occurs.*

34 CFR 104.11 - (a) *General.* (1) *No qualified handicapped person shall, on the basis of handicap, be subjected to discrimination in employment under any program or activity to which this part applies (2) A recipient that receives assistance under the Education of the Handicapped Act shall take positive steps to employ and advance in employment qualified handicapped persons in programs or activities assisted under that Act. (3) A recipient shall make all decisions concerning employment under any program or activity to which this part applies in a manner which ensures that discrimination on the basis of handicap does not occur and may not limit, segregate, or classify applicants or employees in any way that adversely affects their opportunities or status because of handicap. (4) A recipient may not participate in a contractual or other relationship that has the effect of subjecting qualified handicapped applicants or employees to discrimination prohibited by this subpart. The relationships referred to in this paragraph include relationships with employment and referral agencies, with labor unions, with organizations providing or*

administering fringe benefits to employees of the recipient, and with organizations providing training and apprenticeships.

34 CFR 100 Appendix B (Guidelines VII-B. APPRENTICE TRAINING PROGRAMS - A recipient may not enter into any agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants for membership on the basis of race, color, national origin, sex, or handicap. If a recipient enters into a written agreement with a labor union or other sponsor providing for apprentice training, the agreement must contain an assurance from the union or other sponsor: (1) That it does not engage in such discrimination against its membership or applicants for membership; and (2) that apprentice training will be offered and conducted for its membership free of such discrimination.

Required Action:

Although not required, the college should consider entering into a written agreement with the apprenticeship program in which the non-discrimination requirements for the college and the expectations in this regard for its partner institutions are clearly communicated. In addition, the college should maintain demographics of students selected and rejected for the program to ensure the program is not engaging in discrimination. Finally, the college should review the apprenticeships selection criteria to ensure the process does not prevent or discourage any minority or protected group from participation.

Section M - Employment

Colleges are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and candidate selection matters, salary establishment reasonable accommodation, and practices designed to overcome the effects of past discrimination.

M.i Employment Practices

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review did not find any indication that the college engages in any discriminatory employment practices.

Recommendation:

- ✓ Several interviewees stated that a lack of transparency in hiring, re-assigning, and separating staff and faculty has led to low morale and a lack of trust on campus. These individuals reported that recent budgetary concerns had led to significant changes to staffing however, some of the decisions appeared to be biased, which

has resulted in low morale and lack of trust. It is recommended that when possible the college take steps to address these concerns, and to take steps to rebuild trust on campus.

- ✓ The college's employee demographics found that GHC does not have any employee of Alaskan/Native American or Hawaiian/Pacific Islander heritage. The review found no indication of bias or discriminatory in hiring practices however, it is recommended the college review its hiring and employment practices to ensure practices and policies are not contributing to this factor.
- ✓ During interviews, campus community members recommended the college require diversity, equity, and inclusion training at two crucial points: as part of orientation, and when assigned to a hiring committee. Participants felt this would both ensure the campus community understand leaderships commitment to these principles, and would provide them with tools for their job responsibilities.

M.ii Employment Recruitment Notification

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Non-Compliance:

The review found that the college Human Resources website and job descriptions do not include a complete non-discrimination statement as required. Specifically:

- The Human Resource webpage's non-discrimination notice does not include required information regarding the Title IX and disability coordinator;
- The Student Job Application does not include a non-discrimination notice; and
- A review of 5 position openings found that all non-discrimination notices posted on the job descriptions used the work gender instead of sex and did not include required coordinator information.

Criteria:

28 CFR § 35.106 – A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.

34 CFR §100.6(d)- Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this regulation.

34 CFR §104.8(a) – A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a)... “Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications.”

34 CFR §104.8 (b) – If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

34 CFR §106.9 – (a) Notification of policy. (1) Each recipient shall implement specific and continuing steps to notify applicants for admission and employment, students and parents of elementary and secondary school students, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient, that it does not discriminate on the basis of sex in the educational program or activity which it operates, and that it is required by title IX and this part not to discriminate in such a manner. Such notification shall contain such information, and be made in such manner, as the Assistant Secretary finds necessary to apprise such persons of the protections against discrimination assured them by title IX and this part, but shall state at least that the requirement not to discriminate in the education program or activity extends to employment therein, and to admission thereto unless Subpart C does not apply to the recipient, and that inquiries concerning the application of title IX and this part to such recipient may be referred to the employee designated pursuant to §106.8, or to the Assistant Secretary. (2) Each recipient shall make the initial notification required by paragraph (a)(1) of this section within 90 days of the effective date of this part or of the date this part first applies to such recipient, whichever comes later, which notification shall include publication in: (i) Local newspapers; (ii) Newspapers and magazines operated by such recipient or by student, alumnae, or alumni groups for or in connection with such recipient; and (iii) Memoranda or other written communications distributed to every student and employee of such recipient. (b) Publications. (1) Each recipient shall prominently include a statement of the policy described in paragraph (a) of this section in each announcement, bulletin, catalog, or application form which it makes available to any person of a type, described in paragraph (a) of this section, or which is otherwise used in connection with the recruitment of students or employees. (2) A recipient shall not use or distribute a publication of the type described in this paragraph which suggests, by text or illustration, that such recipient treats applicants, students, or employees differently on the basis of sex except as such treatment is permitted by this

part. (c) Distribution. Each recipient shall distribute without discrimination on the basis of sex each publication described in paragraph (b) of this section, and shall apprise each of its admission and employment recruitment representatives of the policy of nondiscrimination described in paragraph (a) of this section, and require such representatives to adhere to such policy.

34 CFR 100 Appendix B (Guidelines VIII-B) - EMPLOYMENT OF FACULTY AND STAFF. B. RECRUITMENT Recipients may not limit their recruitment for employees to schools, communities, or companies disproportionately composed of persons of a particular race, color, national origin, sex, or handicap except for the purpose of overcoming the effects of past discrimination. Every source of faculty must be notified that the recipient does not discriminate in employment on the basis of race, color, national origin, sex, or handicap.

Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscrimination on their main website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, and/or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at

<http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. The statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name/title, address, and telephone number. An email address is not currently required but encouraged. OCR requires coordinator(s) be identified by name on the college's website however, use of title only is allowed in printed material.

M.iii Salary Scales & Assignments

The recipient should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

The investigation did not reveal any evidence of a violation.

The review found no indication of bias or discrimination in employment practices relating to salary and assignments.

M.iv Equal Opportunity & Reasonable Accommodations

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship.

The investigation did not reveal any evidence of a violation.

The review found no indication of bias or discrimination in employment practices relating to salary and assignments.

Recommendations:

- Several employees interviewed requiring reasonable accommodations reported having issues when they had first requested the accommodations from their supervisors. Some of these issues included time delays, and inappropriate requests for information. All those reporting these incidents stated that once the request was forwarded to the staff disability coordinator, they had received what they required quickly and without the need to provide unnecessary information. It is recommended the college notify all employees and, especially supervisors, that requests for accommodations should be directed to Human Resources and/or the staff disability coordinator immediately to ensure staff receive required accommodations.
- Interviews indicated that the college does not have clear guidelines on who has responsibility for the cost of required reasonable accommodations; HR, the employee's department, facilities, etc. To date this has not created any difficulties for the college and there have been no issues however, with budgetary changes, increases in costs to accommodate some disabilities, and staffing changes, this lack of clarity could become a potential issue in the future. To ensure the college can accommodate staff quickly and with appropriate accommodations, it is recommended the college consider clarifying and memorializing budgetary responsibilities for employee accommodations.

Other Recommendations

Diversity, Equity & Inclusion on Campus:

In many interviews, participants stated that the college should take more concrete and intentional steps to promote diversity, equity, and inclusion (DEI) on campus. Most participants stated that the college community was more accepting of LGBTQ individuals due to the groups strong and active presence on campus however, the campus community required much more training and work to provide an inclusive environment for those from other minority groups. Some of the suggestions offered to promote these principles were as follows:

- Several interviewees stated the college community should receive more training in diversity, equity, and inclusion. These individuals stated that although the campus has made some progress in making the campus more accepting of individuals in minority groups, some employees and students continued to resist accepting those from minority and protected groups and engaged in inappropriate behavior.
- Campus community members also suggested the college add components of DEI to its mission and strategic plan. Those interviewed believed that taking this step would prioritize these principles and would create more support for the effort.

- Interviewees also suggested the college add basic courses in diversity, equity, and inclusion to the employee mandated orientation training as a way to both emphasize its priority for the institution and to provide new employees with some key concepts and tools when interacting with the campus community.
- Another suggestion offered was for changes in the college's Bias Incident Team (BIT) and more training for individuals serving on the team. Interviewees suggested providing more transparency around the team's work and creating a requirement for a report or statement by the team after each incident. These interviewees envisioned the report to provide information on the incident, the teams findings and conclusions, and suggested steps the campus should take to avoid similar incidents.
- Both students and staff members suggested having a diversity center on campus to create a safe environment celebrating diversity in the community. Participants also suggested more diversity events, celebrations, and campaigns to create energy and momentum on campus for promotion of DEI principles.

Fiscal Planning & Budgetary Issues

One of the suggestions offered by staff was exploration of new budgetary and funding models that were not as closely tied to the economy and immediate circumstances outside the college's control. Interviewee noted that the recent budgetary shortfalls and reactions to the shortfall had created a great deal of changes and anxiety on campus and had led to low morale. To avoid or decrease these episodes in the future, interviewees suggested leadership consider use of alternative funding models that avoided large and disruptive swings in funding.

Morale on Campus

As previously mentioned in the report, the college has experienced some major upheavals and changes in the past year that have contributed to low morale and general anxiety on campus. Many of the employees spoke of the effect of these changes and the general atmosphere on campus. All participants conceded that executive leadership have made attempts to address these issues and to help the campus overcome low morale. Despite these attempts, some employees and divisions of the college continue to be more deeply affected by recent changes. Some of the suggestions offered by participants to help change the atmosphere were as follows:

- Increasing personal communication was a suggestion made by a large number of participants. Employees noted that the campus was receiving a large amount of information through email notifications that have become redundant and lengthy. These individuals felt a more personal manner of communicating would be much more beneficial and would give employees an avenue to ask questions, express their feelings and anxiety, and made employees feel more valued and heard.
- Several interviewees suggested providing supervisory training to employee with supervision duties. These employees felt that issues on campus were exasperated by some members of management and leadership's poor communication style and felt this type of training could assist in improving morale on campus.

- Another suggestion offered during interviews was to hold more forums to allow the campus community member to feel valued and validated, to discuss and dig into issues, and to allow different perspectives to be shared with the campus community.
- Several individuals largely composed of employees hired within the last year, felt the campus was very fragmented and worked in siloes. These interviewees felt holding ice breakers, campus-wide events, and celebrations that brought the campus community together and allowed various divisions to mingle would be helpful in creating a better environment.

Programs for Formerly Incarcerated Individuals

The college offers programs at Department of Correction facilities and is near some state prisons. In an interview with a formerly incarcerated student, the student expressed feeling alienated and unsupported on campus and reported a lack of resources to help him adjust to the environment. The student recommended the college consider having programs geared toward assisting formerly incarcerated individuals transition back into communities and college, and/or find and recommend resources available in the community.

Public Information Officer

Several employees voiced their concern that the college does not have a Public Information Officer (PIO). Interviewees noted without an individual taking on this role, the college may not receive necessary information and would not be able to share stories of its successes to attract new students, donors, and funding opportunities.

Staffing

In interviews, some staff members expressed their belief that the college was “top heavy” and had a disproportionate number of managers and supervisors compared to frontline staff performing day-to-day work. These interviewees felt this had led to conflicting guidance, decisions that were not supported by the campus community in general, and lack of communications.

Student Athletes:

In interviews with student, staff, and faculty members, many interviewees expressed concern for the college’s African-American student athletes who are living in substandard housing and lack adequate support services. The living situation of these students has been exasperated by the local community, which is small, isolated, homogenous, and often unwelcoming to individuals from minority groups. An interview with several of these students confirmed the isolation and difficulty they are experiencing. The student athletes noted that the college has been supportive of them and they have not experienced difficulties with any college staff or services however, they reported feeling isolated. Some of the suggestions offered by college personnel, students and the student athletes to improve the situation were as follows:

- The student athletes and community members interviewed all mentioned the student’s housing situation as the most prevalent problem. In addition to the substandard conditions, the housing facilities lack basic items such as microwaves and washers and dryers. Some recommendations to alleviate the situation were as follows:

- Rental of a house or building by the college to serve as a residence hall;
 - Use of host or sponsoring families that could be reimbursed through a stipend from the foundation;
 - Providing students with certain items for rent or through community donations such as microwaves, small refrigerators, etc.; and
 - Allowing students to use college resources such as washers and dryers under limited conditions.
- Due to lack of access to a kitchen and associated costs, lack of funds and access to food was a large concern and source of frustration for the student athletes interviewed. The interviewees listed food insecurity as their most pressing problem and stated not worrying about and being concerned about food would go a long way in helping them feel better about their situation and living conditions.
- Interviewees suggested the college consider starting a mentorship program to pair students from minority and protected groups with someone from a similar background to provide the students with individual support. Some interviewees recommended use of volunteer students, and others felt a faculty or staff member would be more helpful but, all those making this suggestion felt the students should have a safe support system, a place to ask for individual assistance, and someone making the effort to stay in touch with the students and to intervene if issues arise.

Student Services

- A large number of interviewees noted that many of the basic student service divisions were short-staffed creating long lines and wait times for appointments. One student stated that she had been unable to receive assistance because only one staff member was assigned to the area and that individual was absent due to a medical issue. Interviewees recommended the college consider cross-training staff in student service divisions to better serve students, and to ease the effect of staff shortages.
- Several student interviews stated that starting college and getting acquainted to the new atmosphere had been stressful. The students suggested the college take measures to make the process less confusing and stressful by taking the following steps:
 - Interviewees suggested more signs on campus directing visitors and new students to main offices and key locations. They also suggested signs in Spanish;
 - Students also suggested placing signs showing offices in buildings close to entranceways rather than by elevators;
 - Another suggestion was creating a checklist for registration explaining the steps required, location of offices, and what would be required to complete the step; and
 - Finally, students suggested use of more student ambassadors and volunteers to guide and assist new students.

Title IX Training for CTE Programs

In the prior academic year one of the college's career and technical programs experienced some potential Title IX related incidents. The program faculty responded to the issues

quickly and appropriately by requesting assistance and training from the college's Title IX Coordinator. As a preemptive measure, training was also provided to other programs in the division however, one faculty member was not receptive to the offer of training and as a result his class did not receive the training. This could indicate the faculty is not properly trained or resistant to enforcing provisions of Title IX, that students in the program are not comfortable reporting potential issues, and/or other risk factors.

It is recommended the college ensure all faculty members are properly trained in applicable laws, their own obligations and duties, and their student rights and obligations. In addition, it is recommended the college consider providing continued and mandated Title IX training for all career and technical programs to avoid future incidents and to ensure students and employees are aware of their rights and obligations.

ATTACHMENT A

Accessibility for Students with Disabilities

Applicable Requirements

Guidelines Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

General compliance

This review was conducted pursuant to OCR's authority under Section 504 and its implementing regulations at 34 C.F.R. Part 104 and Title II of the ADA and its implementing regulations at 28 C.F.R. Part 35. These laws prohibit discrimination on the basis of disability by institutions receiving federal financial assistance from the U.S. Department of Education and by public entities. As a public college that is also a recipient of financial assistance from the Department, the college is subject to the provisions of Section 504 and Title II.

For existing facilities, Section 504 and Title II require that an institution operate its program so that, when viewed in its entirety, it is readily accessible to persons with disabilities (program accessibility standard). Under this standard, an institution is not required to make all existing facilities or every part of its facilities accessible, as long as the program or activity provided at each facility is readily accessible to persons with disabilities. See 34 C.F.R. 104.22 and 28 C.F.R. 35.150. An institution can provide program accessibility for existing facilities through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, or any other methods that result in making its programs or activities accessible to persons with disabilities.

The accessibility standard used for each asset depends on the date construction commenced. Construction commenced after June 3, 1977, through January 26, 1992, must comply with the American National Standards Institute standards (ANSI). For construction projects starting January 26, 1992 through March 12, 2012, the 1991 ADA standards must be met. The colleges chose to follow the 1991 ADA standards rather than the UFAS standards where the option existed during this period. Any construction starting after March 12, 2012 must comply with the 2010 ADA standards identified in the International Building Code. New alterations to a facility or part of a facility are analyzed similarly to new construction.

The available facility construction and alteration dates for all Washington State buildings do not typically include accurate month and day information. The available data includes the year of construction and/or major renovation substantial completion. A major renovation is recorded when a construction renovation project includes at least one major building component and the cost is more than 60% of the building component value. Typically, major renovations address

most building components and require compliance with current building code. Since the building construction or renovation date reflects the end of construction, the start of construction or renovation was calculated based on a typical two-year construction period. The accessibility standard identified in the building list below reflects the beginning of construction dates. If no construction date data was available, the current standard was applied.

Parking Lots

Accessible parking spaces within student parking lots are the start of the accessible route to an accessible student program or activity. Therefore, all parking lots that are designated as student parking must be configured to eliminate all barriers along the accessible route to student programs and activities.

College parking lots are typically designated and reviewed individually (per Advisory section 208.2 in the 2010 ADA Standards) rather than as a whole campus. A college typically has dozens of parking lots that are loosely connected and hard to delineate. Typically lot boundaries are defined by physical barriers that restrict access between lots (lack an accessible route between lots or separated by significant distance). However, ADA parking spaces may be clustered in one or more lots if equivalent or greater accessibility is provided in terms of distance from the accessible entrance, parking fees and convenience. These requirements apply to free parking or any type of paid parking. If only paid parking is provided and the College also provides free visitor spaces, then the visitor spaces should be considered a separate lot and will require accessible parking.

Since parking lot resurfacing or restriping efforts are not recorded in a database, the age of the lots are not known. Parking lots are typically maintained, where resurfacing occurs roughly every twenty years. Therefore, all parking lots were reviewed with the assumption that they were no more than 20 years old. Nearly all college campuses are more than 20 years old. In cases where the parking lot appeared to have been recently striped (within 5 years) or was part of a new campus construction project, the current accessibility standard was applied.

Accessible Routes

An accessible route must be a continuous, unobstructed path connecting all accessible elements and spaces within and between buildings or facility elements where student programs or activities are provided by the college. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts. While not every route is required to be accessible, an accessible route must exist between all student programs or activities provided by the college. Alternate routes are allowable when the route does not require students with disabilities to traverse greater distances or in unfavorable

conditions. All non-accessible parking areas and pedestrian routes should be marked as such with directional signage to the nearest accessible area or route.

Summary of Findings and Analysis

The following chart indicates the start of construction / alteration dates for the college facilities as well as the applicable accessibility standards.

| Building | Start of Construction, Major Renovation or acquisition (Most Recent Date) | Applicable Accessibility Standard |
|---------------------------|---|--|
| Acqua | 1982 | ANSI Standard |
| Admin | 1955 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Auto/Weld Technology | 2005 | 1991 Standard |
| Baseball Storage | 1973 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Bishop | 1972 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Child Care Center | 2008 | 1991 Standard |
| Columbia Education Center | 2004 | 1991 Standard |
| Ghc Whiteside | 1996 | 1991 Standard |
| Heavy Equipment Shop | 1986 | ANSI Standard |
| Hillier Union Building | 1955 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Leon Lead Rec Greenhouse | 2007 | 1991 Standard |
| Lib | 2002 | 1991 Standard |
| Lifsci | 1955 | Readily Accessible: 34 C.F.R. Sec |

| | | |
|--------------------------|------|---|
| | | 104.22; 28 C.F.R. Sec 35.150 |
| Manspeaker Instructional | 2005 | 1991 Standard |
| Physci | 1969 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Physed | 1955 | Readily Accessible: 34 C.F.R. Sec 104.22; 28 C.F.R. Sec 35.150 |
| Riverview Education Ctr | 1999 | 1991 Standard |
| Sand Shed | 2008 | 1991 Standard |
| Simpson Education Center | 1996 | 1991 Standard |
| Vocational Storage | 1995 | 1991 Standard |
| Voktek | 2008 | 1991 Standard |
| Schermer Instructional | 2013 | 2010 Standard |

Site Accessibility Compliance

S-1 **Non-Compliance:** The lot does not have the required number of accessible parking spaces near the Voktek building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0002 in appendix.

Additional Field Notes: Need one accessible stall

Applicable Standard (1991 ADA Standards):4.1.2 (5) (a) If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured. Required Total Parking Minimum Number in Lot of Accessible Spaces: 1 to 25 = 1; 26 to 50 = 2; 51 to 75 = 3; 76 to 100 = 4; 101 to 150 = 5; 151 to 200 = 6; 201 to 300 = 7; 301 to 400 = 8; 401 to 500 = 9; 501 to 1000 = 2 percent of total; 1001 and over = 20, plus 1 for each 100 over 1000

Required Action to correct non-compliant component: Provide at least one accessible parking space. At least one space must be van accessible.

Current ADA Standard: 208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the

number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

S-2 **Non-Compliance:** The required number of van accessible spaces are not provided near the Schermer Instructional building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0005 in appendix.

Additional Field Notes: 14 Accessible, 2 van accessible. One additional van space required.

Applicable Standard (1991 ADA Standards):4.1.2(5)(b) One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated “van accessible” as required by 4.6.4. The vertical clearance at such spaces shall comply with 4.6.5. All such spaces may be grouped on one level of a parking structure. EXCEPTION: Provision of all required parking spaces in conformance with “Universal Parking Design” (see appendix A4.6.3) is permitted.

Required Action to correct non-compliant component: Provide at least one van accessible space per six accessible spaces.

Current ADA Standard: 208.2.4 Van Parking Spaces. For every six or fraction of six parking spaces required by 208.2 to comply with 502, at least one shall be a van parking space complying with 502.

S-3 **Non-Compliance:** The accessible parking spaces do not comply with the space width and access aisle requirements near the Hillier Union building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0006 in appendix.

Additional Field Notes: No striping for access isle. Missing signage and accessible symbol. Accessible signs at 24" above ground. Provide correct striping and signage for two accessible spaces.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking spaces that comply with the space width and access aisle requirements.

Current ADA Standard: 502.2 Vehicle Spaces. Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm)

wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3. EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.

- S-4 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Hillier Union building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0007 in appendix.

Additional Field Notes: Sign mounted at 24". Missing van accessible sign. Provide sign at correct height with van accessible sign.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-5 **Non-Compliance:** The accessible parking spaces do not comply with the space width and access aisle requirements near the Bishop building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0008 in appendix.

Additional Field Notes: Missing access isles between spaces. Missing accessible signs. Two must be van spaces with signs mounted at 60" minimum.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking spaces that comply with the space width and access aisle requirements.

Current ADA Standard: 502.2 Vehicle Spaces. Car parking spaces shall be 96 inches

(2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3. EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.

- S-6 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Bishop building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0009 in appendix.

Additional Field Notes: Signs mounted at 48".

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

- S-7 **Non-Compliance:** Parking spaces access isles are not accessible because they are not the correct width or location near the Heavy Equipment Shop building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0010 in appendix.

Additional Field Notes: Spot slope 4 degrees. Accessible spot can be moved to adjacent lot south of this area.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide parking access aisles that meet the minimum requirements for width and do not require individuals to travel behind parked vehicles.

Current ADA Standard: 502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum. 502.3.4 Location. Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces.

- S-8 **Non-Compliance:** The accessible parking spaces do not comply with the space width and access aisle requirements near the Auto/Weld Technology building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0011 in appendix.

Additional Field Notes: Missing access isle striping on level portion of space.

Applicable Standard (1991 ADA Standards):4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.

Required Action to correct non-compliant component: Provide accessible parking spaces that comply with the space width and access aisle requirements.

Current ADA Standard: 502.2 Vehicle Spaces. Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3.EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.

- S-9 **Non-Compliance:** There is not enough knee clearance under the table near the Lib building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0022 in appendix.

Additional Field Notes: The knee space is 12" deep.

Applicable Standard (1991 ADA Standards):4.32.3 Knee Clearances. If seating for people in wheelchairs is provided at tables or counters, knee spaces at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided (see Fig. 45).

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements.

Current ADA Standard: 902.2 Clear Floor or Ground Space. A clear floor space

complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3.

- S-10 **Non-Compliance:** The ramp return landing is too small near the Schermer Instructional building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0026 in appendix.

Additional Field Notes: The ramp landings are 48" deep. The ramp runs exceed 50'. The ramp must be modified or a sign must be placed to direct students to the accessible building entrance on the 2nd level. A sign must also be placed at the bottom of the ramp indicating that it is not accessible and direct students to an accessible route.

Applicable Standard (1991 ADA Standards):4.8.4* Landings. Ramps shall have level landings at bottom and top of each ramp and each ramp run. Landings shall have the following features: (3) If ramps change direction at landings, the minimum landing size shall be 60 in by 60 in (1525 mm by 1525 mm).

Required Action to correct non-compliant component: Provide a landing at the ramp return that meets the minimum size requirements for an accessible ramp.

Current ADA Standard: 405.7.4 Change in Direction. Ramps that change direction between runs at landings shall have a clear landing 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum.

- S-11 **Non-Compliance:** The surface slope is too steep near the Lifsci building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0030 in appendix.

Additional Field Notes: The path slope in front of the 500 building is 4 degrees. Either the path needs to be modified into a ramp (install rails) or a sign must be installed at the bottom of the adjacent ramp directing students to an accessible entrance on the lower level of the 500 building.

Applicable Standard (1991 ADA Standards):4.3.7 Slope. An accessible route with a running slope greater than 1:20 is a ramp and shall comply with 4.8. Nowhere shall the cross slope of an accessible route exceed 1:50.

Required Action to correct non-compliant component: An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided.

Current ADA Standard: 403.3 Slope. The running slope of walking surfaces shall not

be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.

- S-12 **Non-Compliance:** The surface slope is too steep near the Physed building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0031 in appendix.

Additional Field Notes: Walkway to student food bank is 5 degrees. It may be possible to modify this route by adding handrails and turning it into a ramp.

Applicable Standard (1991 ADA Standards):4.3.7 Slope. An accessible route with a running slope greater than 1:20 is a ramp and shall comply with 4.8. Nowhere shall the cross slope of an accessible route exceed 1:50.

Required Action to correct non-compliant component: An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided.

Current ADA Standard: 403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.

- S-13 **Non-Compliance:** The accessible parking signs do not comply with the accessibility requirements near the Riverview Education Ctr building. Modifications to this component must comply with current ADA standards. See photo exhibit ADA0047 in appendix.

Additional Field Notes: Missing signs at each space. One must be for van.

Applicable Standard (1991 ADA Standards):4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Required Action to correct non-compliant component: Provide the required accessible parking signs at each accessible parking space.

Current ADA Standard: 502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

Building Accessibility Compliance

B-1 **Non-Compliance:** There is not enough knee clearance under the table in room 7230 of the Voktek building. See photo exhibit ADA0003 in appendix.

Field Notes: 25" clearance under tables

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

B-2 **Non-Compliance:** There is not enough knee clearance under the table in room 7231 of the Voktek building. See photo exhibit ADA0004 in appendix.

Field Notes: Tables have 11" deep knee clearance. One work table must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

B-3 **Non-Compliance:** There is not enough knee clearance under the table in room 1914 of the Auto/Weld Technology building. See photo exhibit ADA0012 in appendix.

Field Notes: 25" knee clearance. One table must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

B-4 **Non-Compliance:** There is not enough knee clearance under the table near room 1908 of the Auto/Weld Technology building. See photo exhibit ADA0013 in appendix.

Field Notes: 4" depth under table surface

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

B-5 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 1908 of the Auto/Weld Technology building. See photo exhibit ADA0014 in appendix.

Field Notes: Pull handle at 66".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where

a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-6 **Non-Compliance:** The table surface is outside of the acceptable height range for accessibility near room 1912 of the Auto/Weld Technology building. See photo exhibit ADA0015 in appendix.

Field Notes: Work table is 37".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a minimum of five percent of all tables and surfaces that comply with the height requirement for accessibility. A minimum of one work table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.

- B-7 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 1927 of the Auto/Weld Technology building. See photo exhibit ADA0016 in appendix.

Field Notes: The pull handle is at 66".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or

other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

B-8 Non-Compliance: There are not enough accessible seats in room Main auditorium of the Bishop building. See photo exhibit ADA0017 in appendix.

Field Notes: 4 seats provided. Provide 2 additional seats that can be readily accessible.

Applicable Standard: The most recent construction or major renovation efforts began in 1972 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Based on the room capacity, provide at least six accessible seats. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 221.2.1 Number and Location. Wheelchair spaces shall be provided complying with 221.2.1.221.2.1.1 General Seating. Wheelchair spaces complying with 802.1 shall be provided in accordance with Table 221.2.1.1.

B-9 Non-Compliance: The clear floor area in front of the door is not big enough in room 1512 of the Lib building. See photo exhibit ADA0018 in appendix.

Field Notes: 40" clear depth in front of door. Remove one section of seating to create 60" depth clear minimum.

Applicable Standard: The most recent construction or major renovation efforts began in 2002 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 25

Required Action to correct non-compliant component: Provide a clear floor area

in front of a door approach that extends at least eighteen (18) inches beyond the latch side door jamb and has a length of at least sixty (60) inches in front of the door. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 404.2.4.1 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1

- B-10 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range in room 1512 of the Lib building. See photo exhibit ADA0019 in appendix.

Field Notes: Pamphlets at 68".

Applicable Standard: The most recent construction or major renovation efforts began in 2002 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-11 **Non-Compliance:** The table surface is outside of the acceptable height range for accessibility in room 1512 of the Lib building. See photo exhibit ADA0020 in appendix.

Field Notes: Sign-in counter at 42".

Applicable Standard: The most recent construction or major renovation efforts began in 2002 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either

by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a minimum of five percent of all tables and surfaces that comply with the height requirement for accessibility. A minimum of one work table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.

- B-12 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object in room 1506 of the Lib building. See photo exhibit ADA0021 in appendix.

Field Notes: Drinking fountains and AED protrude 8" to 16". Cane detection must be placed on each side of objects.

Applicable Standard: The most recent construction or major renovation efforts began in 2002 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-13 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object in room Near restrooms of the Hillier Union building. See photo exhibit ADA0023 in appendix.

Field Notes: Fountain protrudes 16".

Applicable Standard: The most recent construction or major renovation efforts began in 1955 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-14 **Non-Compliance:** There is not enough knee clearance under the table in room Timber Café of the Hillier Union building. See photo exhibit ADA0024 in appendix.

Field Notes: At least one table must be accessible with required knee clearance.

Applicable Standard: The most recent construction or major renovation efforts began in 1955 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

- B-15 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 140 of the Hillier Union building. See photo exhibit ADA0025 in appendix.

Field Notes: Pamphlets at 72"

Applicable Standard: The most recent construction or major renovation efforts began in 1955 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-16 Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 4213 of the Schermer Instructional building. See photo exhibit ADA0027 in appendix.

Field Notes: Water fountain protrudes 16". Cane detection required on each side of fountain.

Applicable Standard: The most recent construction or major renovation efforts began in 2013 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 4.4.1* General. Objects projecting from walls (for example, telephones) with their leading edges between 27 in and 80 in (685 mm and 2030 mm) above the finished floor shall protrude no more than 4 in (100 mm) into walks, halls, corridors, passageways, or aisles (see Fig. 8(a)). Objects mounted with their leading edges at or below 27 in (685 mm) above the finished floor may protrude any amount (see Fig. 8(a) and (b)). Free-standing objects mounted on posts or pylons may overhang 12 in (305 mm) maximum from 27 in to 80 in (685 mm to 2030 mm) above the ground or finished floor (see Fig. 8(c) and (d)). Protruding objects shall not reduce the clear width of an accessible route or maneuvering space (see Fig. 8(e)).

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-17 Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 4413 of the Schermer Instructional building. See photo exhibit ADA0028 in appendix.

Field Notes: Fountain protrudes 16".

Applicable Standard: The most recent construction or major renovation efforts began in 2013 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 4.4.1* General. Objects projecting from walls (for example, telephones) with their leading edges between 27 in and 80 in (685 mm and 2030 mm) above the finished floor shall protrude no more than 4 in (100 mm) into walks, halls, corridors, passageways, or aisles (see Fig. 8(a)). Objects mounted with their leading edges at or below 27 in (685 mm) above the finished floor may protrude any amount (see Fig. 8(a) and (b)). Free-standing objects mounted on posts or pylons may overhang 12 in (305 mm) maximum from 27 in to 80 in (685 mm to 2030 mm) above the ground or finished floor (see Fig. 8(c) and (d)). Protruding objects shall not reduce the clear width of an accessible route or maneuvering space (see Fig. 8(e)).

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-18 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 3313 of the Schermer Instructional building. See photo exhibit ADA0029 in appendix.

Field Notes: The fountain protrudes 16".

Applicable Standard: The most recent construction or major renovation efforts began in 2013 for this building. Therefore, 2010 ADA standards must be met.

2010 ADA standard: Section 4.4.1* General. Objects projecting from walls (for example, telephones) with their leading edges between 27 in and 80 in (685 mm and 2030 mm) above the finished floor shall protrude no more than 4 in (100 mm) into walks, halls, corridors, passageways, or aisles (see Fig. 8(a)). Objects mounted with their leading edges at or below 27 in (685 mm) above the finished floor may protrude any amount (see Fig. 8(a) and (b)). Free-standing objects mounted on posts or pylons may overhang 12 in (305 mm) maximum from 27 in to 80 in (685 mm to 2030 mm) above the ground or finished floor (see Fig. 8(c) and (d)). Protruding objects shall not reduce the clear width of an accessible route or maneuvering space (see Fig. 8(e)).

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges

more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-19 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 1424 of the Child Care Center building. See photo exhibit ADA0032 in appendix.

Field Notes: Shelf at 62".

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-20 **Non-Compliance:** The sink drain pipe and hot water lines are not insulated or protected near room 1416 of the Child Care Center building. See photo exhibit ADA0033 in appendix.

Field Notes: None available

Applicable Standard: The most recent construction or major renovation efforts began in 2008 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide insulation or other

protection over the sink drain pipe and hot water lines. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

- B-21 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 2350 of the Manspeaker Instructional building. See photo exhibit ADA0034 in appendix.

Field Notes: Fountains protrude 14".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-22 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 2306 of the Manspeaker Instructional building. See photo exhibit ADA0035 in appendix.

Field Notes: Handouts at 60".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where

a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-23 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 2306 of the Manspeaker Instructional building. See photo exhibit ADA0036 in appendix.

Field Notes: Fountains protrude 12".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-24 **Non-Compliance:** The service counter is too high and/or too narrow in room 2307 of the Manspeaker Instructional building. See photo exhibit ADA0037 in appendix.

Field Notes: Service counter is 45" high. An alternate service table placed adjacent to this counter would comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a service counter

that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or twenty four (24) inches long for a front approach. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top.

EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

- B-25 **Non-Compliance:** There is not enough knee clearance under the table in room 2314 of the Manspeaker Instructional building. See photo exhibit ADA0038 in appendix.

Field Notes: Table knee clearance is 25". One table must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

- B-26 **Non-Compliance:** The materials or other components are not located within the accessible side reach range near room 2406 of the Manspeaker Instructional building. See photo exhibit ADA0039 in appendix.

Field Notes: File folder hagers at 60"

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 6(a), 6(b), 6(c)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable side height and in an area free of obstructions that

restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.3 Side Reach. 308.3.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTIONS: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum. 308.3.2 Obstructed High Reach. Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (865 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1220 mm) maximum for a reach depth of 10 inches (255 mm) maximum. Where the reach depth exceeds 10 inches (255 mm), the high side reach shall be 46 inches (1170 mm) maximum for a reach depth of 24 inches (610 mm) maximum. EXCEPTIONS: 1. The top of washing machines and clothes dryers shall be permitted to be 36 inches (915 mm) maximum above the finish floor. 2. Operable parts of fuel dispensers shall be permitted to be 54 inches (1370 mm) maximum measured from the surface of the vehicular way where fuel dispensers are installed on existing curbs.

- B-27 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 2430 of the Manspeaker Instructional building. See photo exhibit ADA0040 in appendix.

Field Notes: Fountain protrudes 12".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-28 **Non-Compliance:** There is not enough knee clearance under the table near room 2202 of the Manspeaker Instructional building. See photo exhibit ADA0041 in appendix.

Field Notes: Table knee clearance is 25". One must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

- B-29 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 2203 of the Manspeaker Instructional building. See photo exhibit ADA0042 in appendix.

Field Notes: Fountain protrudes 12".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-30 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 2104 of the Manspeaker Instructional building. See photo exhibit ADA0043 in appendix.

Field Notes: Fountains protrude 6".

Applicable Standard: The most recent construction or major renovation efforts began in 2005 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-31 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 860 of the Physci building. See photo exhibit ADA0044 in appendix.

Field Notes: Resource shelves at 60".

Applicable Standard: The most recent construction or major renovation efforts began in 1969 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-32 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 853 of the Physci building. See photo exhibit ADA0045 in appendix.

Field Notes: Fountain protrudes 16".

Applicable Standard: The most recent construction or major renovation efforts began in 1969 for this building. Therefore, no ADA standards were in place at the time of

construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity. 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-33 **Non-Compliance:** The table surface is outside of the acceptable height range for accessibility near room 852 of the Physci building. See photo exhibit ADA0046 in appendix.

Field Notes: Tables at 42".

Applicable Standard: The most recent construction or major renovation efforts began in 1969 for this building. Therefore, no ADA standards were in place at the time of construction. However, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a minimum of five percent of all tables and surfaces that comply with the height requirement for accessibility. A minimum of one work table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.

- B-34 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 113 of the Riverview Education Ctr building. See photo exhibit ADA0048 in appendix.

Field Notes: Fountain protrudes 8' at 27" above floor. Cane detection required on right side only.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-35 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 112 of the Riverview Education Ctr building. See photo exhibit ADA0049 in appendix.

Field Notes: Pamphlets at 72" in several locations in this area.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-36 **Non-Compliance:** The materials or other components are not located within the accessible forward reach range near room 210 of the Riverview Education Ctr building. See photo exhibit ADA0050 in appendix.

Field Notes: Pamphlets at 72". Reach range is reduced if table remains in front of reachable items.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 5(a), 5(b)

Required Action to correct non-compliant component: Provide all materials or other components at a reachable forward height and in an area free of obstructions that restrict access. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 308.2 Forward Reach. 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground. 308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.

- B-37 **Non-Compliance:** The table surface is outside of the acceptable height range for accessibility near room 210 of the Riverview Education Ctr building. See photo exhibit ADA0051 in appendix.

Field Notes: Countertop at 39". Difficult to adjust. Pamphlets at 60", must be placed within reach range.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a minimum of five percent of all tables and surfaces that comply with the height requirement for accessibility. A minimum of one work table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.

- B-38 **Non-Compliance:** The table surface is outside of the acceptable height range for accessibility in room 210 of the Riverview Education Ctr building. See photo exhibit

ADA0052 in appendix.

Field Notes: Testing station knee clearance is 25.5".

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a minimum of five percent of all tables and surfaces that comply with the height requirement for accessibility. A minimum of one work table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.

- B-39 **Non-Compliance:** A protruding object exceeds 4" or the accessible route is too narrow at a protruding object near room 217 of the Riverview Education Ctr building. See photo exhibit ADA0053 in appendix.

Field Notes: Fountain protrudes 8" at 27" above floor.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 8(a), 8(b), 8(c), 8(d), 8(e)

Required Action to correct non-compliant component: Provide an accessible circulation route that complies with the accessibility requirements for protruding objects. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

- B-40 **Non-Compliance:** The service counter is too high and/or too narrow near room 212 of the Riverview Education Ctr building. See photo exhibit ADA0054 in appendix.

Field Notes: Counter at 43". Can provide an alternative adjacent service table to meet this requirement.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: More recent standards include requirements related to this component, but there is nothing within this older standard that addresses the accessibility issue. Therefore, the facility must be made "readily accessible" either by correcting non-accessible building components or by providing an alternate accessible location for the student program or activity.

Required Action to correct non-compliant component: Provide a service counter that is thirty six (36) inches maximum above the floor and thirty six (36) inches long for a parallel approach or twenty four (24) inches long for a front approach. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter.

- B-41 **Non-Compliance:** There is not enough knee clearance under the table in room 213 of the Riverview Education Ctr building. See photo exhibit ADA0055 in appendix.

Field Notes: Tables have 24" knee clearance. One must comply.

Applicable Standard: The most recent construction or major renovation efforts began in 1999 for this building. Therefore, 1991 ADA standards must be met.

1991 ADA standard: Section 45

Required Action to correct non-compliant component: Provide adequate knee clearance under a minimum of five percent of all tables provided. At least one table must comply with the requirements. Since accessibility barriers must be removed, the modifications must comply with current accessibility standards.

Current ADA Standard: Section 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided.

2019-2020 Civil Rights Review Voluntary Compliance Plan (VCP) Grays Harbor College

| | |
|-----------------------------------|---|
| College Contact/Liaison: | Jennifer Alt, Vice-President of Student Affairs |
| Last Day of Site Visit: | March 6, 2020 |
| Letter of Finding Date: | April 13, 2020 |
| VCP Date: | |
| Final Completion Date: | |
| Completion Date: | |
| Final VCP Acceptance Date: | |

A ADMINISTRATIVE

Recipients need to have certain basic requirements in place to comply with OCR Guidelines and Title IX, Section 504, and Title II requirements. These basic procedures include an annual public notice, continuous notifications, designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II and a grievance procedure that will allow students an avenue for dealing with alleged discrimination.

(xiii) Continuous Notification:

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees (including those with impaired vision or hearing), and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Results of Compliance Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|--|--|--------------------|-------------------------|--------------------------|
| A.i.1 | A review of a sample of the college's forms, advertisements and other printed material, as well as the college's website, found GHC does not include the required nondiscrimination statement in | A link was added to the bottom of the www.ghc.edu website under "College Resources" called "Public Information Disclosure". | Dr. Jennifer Alt VPSS Jennifer.alt@ghc.edu 360-538-4067 | 6/9/2020 | 5/8/20 | Reviewed website. |

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| | <p>printed material or on its website as required.</p> <p>The college's main website does not include a link to the nondiscrimination statement, and the information is not included in the Student's Rights section of web. A search of the website for nondiscrimination information found it was only included on the Human Resource page, and as a policy in the "Operational Policies and Administrative Procedures" section.</p> <p>A review of 38 forms, advertisements, and other printed materials found 28 items did not include a nondiscrimination statement, 6 items included a non-discrimination statement that used the word gender instead of sex as a protected category, and finally, 10 statements included all protected categories, but did not include coordinator information.</p> | <p>When you click on that link, it takes you to a page where we have the "Annual Non-Discrimination Notice" published. We have also included the Continuous notice below that in the long form and short form for all to use in their documents.</p> | | | | |
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Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscrimination on their main website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, and/or employees. The nondiscrimination statement on the college's main webpage should be in a location that can be accessed with one click.

To meet OCR requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. The statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name/title, address, and

telephone number. An email address is not currently required but encouraged. OCR requires coordinator(s) be identified by name on the college's website however, use of title only is allowed in printed material. Department of Education's OCR requires all nondiscrimination statements to include six protected categories; race, color, national origin, sex, disability and age. The work gender cannot be substituted for sex.

(xiv) Title IX, Section 504, and Title II Coordinators:

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX. It is acceptable for the college to use the coordinator's title on printed materials, but identification of the coordinator(s) by name is required on the college's website.

Results of Review:

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|--|---|--|-----------------------------------|
| A.ii | <p>The college has designated coordinators for Title IX, Title II and Section 504 as required, but does not include up-to-date information on coordinators on its website and all required printed material. In addition, interviews with staff and students found a large portion of interviewees did not know the identity of the college's Title IX Coordinator.</p> | <p>The college has the Title IX, Title II and Section 504 coordinators listed on the following websites:</p> <p>www.ghc.edu/pubinfo</p> <p>https://www.ghc.edu/about/title-ix-sexual-assault-and-harassment</p> <p>https://www.ghc.edu/sites/default/files/AboutGHC/documents/policies/406_01.pdf</p> | <p>Dr. Jennifer Alt VPSS Jennifer.alt@ghc.edu 360-538-4067</p> | <p>Within 2-3 months of return to physical campus after remote operations are over.</p> | <p>Website updates were completed 5/8/20 for listing coordinators and non-discrimination notices.</p> <p>We will need to return to campus physically to complete</p> | <p>Reviewed online documents.</p> |

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| | | <p>Given that the college is in remote operations indefinitely, we are currently unable to update printed materials. However, upon return to campus, within the first two months back, printed materials will be updated and distributed appropriately.</p> <p>The college has created non-discrimination notices for use on all publications, application forms, or other recruitment materials. All staff have been apprised that this needs to be included and all forms will be updated within two months of physical return to campus. If employees are able to update digital documents while working remotely, they are doing so. The 2020-2021 college catalog has been updated with a statement of nondiscriminatory policy and coordinator identification.</p> | | | the other items. | |
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| | | <p>The college will work on creating posters and handouts within two months upon return to campus from remote operations. When the fall public disclosure notices go out to staff and students, we will include coordinator and non-discriminatory policy language in the emails. Within three months of return, we will also host at least one session for students, faculty, and staff about Title IX and Section 504 regulations.</p> | | | | |
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Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy on its website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials made available to participants, students, applicants, community members, or employees. The statement must contain the identification by name or title, address, and telephone number of the employee(s) responsible for coordinating compliance efforts. Inclusion of an email address is encouraged, but not required at this time.

In addition, the college should take measures to better distribute information on the identity of the college’s coordinators and how they can be contacted on a regular basis. Step to disburse this information can include use of emails, posters and handouts around campus, and training sessions.

(xv) Annual Public Notification:

Prior to the beginning of each school year (Fall term), recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, disability, or age. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, publications mailed to community members and/or other media that reaches the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and disabled individuals. A brief summary of program offerings and admission criteria should be included in the annual announcement, as well as the name, address and telephone number of the person(s) designated to coordinate Title IX and Section 504 compliance activity. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that the college will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| A.iii | Grays Harbor College did not publish an annual non-discrimination notice at the beginning of the 2019 Fall term as required. | <p>The annual non-discrimination notice is now posted on the website at www.ghc.edu/pubinfo</p> <p>This information will be included when annual disclosure emails are sent to students, faculty and staff prior to fall.</p> <p>The GHC website has "Google Translate" at the bottom of each page that allows the public to choose a language and the website converts into that language. This addresses the need to</p> | Dr. Jennifer Alt VPSS Jennifer.alt@ghc.edu 360-538-4067 | September 2020 for all except for Spanish translation which would be March 2021 | | |

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| | | <p>provide access to the statement to anyone with limited English skills.</p> <p>The college is currently planning in its budget to consult and hire a Spanish language translator to translate publications, forms, notices, etc. from English to Spanish. Once this occurs, we will have the non-discrimination notice fully available in Spanish.</p> | | | | |
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Required Action:

The college must ensure it publishes and distributes a non-discrimination notice annually, prior to the beginning of the fall term. The notification should include a brief summary of the college’s program offerings, admission criteria, and the name(s) and title(s), office address, and phone number of person(s) designated to coordinate compliance under Title IX, Title II and Section 504. The notice must be distributed in a manner that will reach students, employees, applicants, the public, and communities of national origin minority with limited English language skills in the area. Distribution of the notice on the college’s main website is acceptable. In addition, since the college has acknowledged that its service area includes one or more “communities of national origin minority persons with limited English language skills”, it should provide the annual notice in languages used by these communities and in a manner that reasonably assures that it is available to them.

(xvi) Grievance Procedures:

Federal law requires colleges to adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| A.iv | The review did not reveal any evidence of a violation. | | | | | |
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B SITE LOCATION AND STUDENT ELIGIBILITY CRITERIA

Vocational Education Guidelines, Section IV-A – IV-K, establish standards that the site selection and criteria for student eligibility cannot have the purpose or effect of discriminating, segregating, or excluding students on the basis of race, color, national origin, sex, or disability. Issues that could result in discrimination or segregation include the selection of certain sites for vocational education facilities, establishing a geographic residence requirement, establishing numerical limits on students from sending schools, additions to existing vocational education facilities, or any other criteria that have the purpose or effect of disproportionately excluding students of a particular race, national origin, sex, or disability.

(x) Student Eligibility:

Recipients may not develop, impose, maintain, approve, or implement student admission eligibility criteria that discriminates on the basis of race, color, national origin, sex or disability. Student eligibility criteria for admission to vocation education schools, and/or facilities for programs cannot discriminate on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| B.i | The review did not reveal any evidence of a violation. | | | | | |

(xi) Site Selection and Modifications:

Recipient may not select or approve a site that has the purpose or effect of excluding, segregating, or otherwise discriminating on the basis of race, color, or national origin. Recipients must locate vocational facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. A recipient may not add to, modify, or renovate the physical plan of a vocational facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| B.ii | The review did not reveal any evidence of a violation. | | | | | |
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(xii) Residency:

A recipient may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| B.iii | The review did not reveal any evidence of a violation. | | | | | |

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| C RECRUITMENT |
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Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex, or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should include individuals from different races, national origins, sex, and disabilities.

(xix) Recruitment Activities:

Recipients must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| C.i | The review did not reveal any evidence of a violation. | | | | | |

(xx) Recruitment Materials:

Recruitment materials' description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| C.ii | The review did not reveal any evidence of a violation. | | | | | |

(xxi) Recruitment Teams:

To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| C.iii | The review did not reveal any evidence of a violation. | | | | | |

(xxii) Counseling LEP/Sensory Impairments:

Recipients must ensure that counselors can effectively communicate with individuals with limited English proficiency and sensory impairments.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|--|--------------------|-------------------------|--------------------------|
| C.iv | The college is taking steps to recruit and market programs to Spanish speaking community members. These efforts include offering a website on English language programs in Spanish, radio advertisements in Spanish, and outreach to the Spanish speaking community by attending various event. Despite these marketing efforts, the college's ability to serve | The college is working to identify funding to hire a Spanish language translator to begin work on all documents and recruitment materials. The college Institutional Effectiveness, Research, and Planning department | Dr. Jennifer Alt VPSS Jennifer.alt@ghc.edu 360-538-4067 | March 2021 | | |

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| | <p>Spanish speaking individuals on campus is limited.</p> <p>The college's Transition Center and Student Services have staff members who are fluent in Spanish, and able to provide limited assistance to students that are native Spanish speakers. The college staff usually refer individuals with limited English skills to the Transition Center where every effort is made to assist the student regardless of their native language. However, community members do not always find their way to the Transition Center. In addition, interviews with employees and students revealed other areas of the college have limited resources and ability to provide counseling services to individuals with limited English language skills.</p> <p>Interviews also found that due to the college's recent budgetary shortfalls, many divisions are not fully staffed and most employee's workload has recently increased a great deal. Since providing interpretation services is not a job requirement and/or an assigned duty for Spanish speaking staff, helping students often creates difficulties for these staff members and increases their workload.</p> | <p>will review data annually to determine if there are changes in demographics and if resources should be designated to serve additional communities. They will provide an update to the executive team of the findings annually.</p> <p>The college will create and distribute guidelines on how individuals who are not proficient in English will be served. These guidelines will include directions notifying employees when an informal interpreter is not appropriate, and how to access translation and interpretation services. These guidelines will be created by members of the Diversity Advisory Council.</p> <p>The college has a current counseling vacancy and plans to modify the job description to include Spanish as a mandatory requirement of the</p> | | | | |
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| | | position in order to address the need to provide counseling services in Spanish. Unfortunately, at this time, due to budget reductions, this position may not be filled for another year, but when it does reopen, it will be modified with that requirement. | | | | |
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Required Action:

The college should take steps to ensure individuals involved in recruitment, counseling, and student services have the necessary tools and resources to communicate effectively with all community members. In addition, the college should periodically re-evaluate its community to determine if there are changes in demographics and if resources should be designated to serve additional communities.

If services of bi-lingual employees for interpreting is required, the college should establish and distribute guidelines on how individuals who are not proficient in English will be served, and make interpretation services part of bilingual employee's job duties. Guidelines should also include directions notifying employees when an informal interpreter is not appropriate, and how to access translation and interpretation services..

(xxiii) Promotional Effects:

Recipients may not undertake promotional efforts in a manner that creates or perpetuates stereotypes or limitations based on race, color, national origin, sex or disability. Materials that are part of promotional efforts may not create or perpetuate stereotypes through text or illustrations.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|---|-------------------------------|--------------------|-------------------------|--------------------------|
| C.v | The review found some pictures and illustrations used to promote and advertise career and technical program (CTE) did not include | The college marketing committee reviewed website materials for Carpentry, Automotive, | Nicole Lacroix VPI | March 2021 | | |

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| | <p>individuals from varying backgrounds and appeared to perpetuate stereotypes. The pictures used on the college's website for the Carpentry, Automotive, and Diesel Technology only contained pictures of males and mostly Caucasian males. In addition, all testimonials of prior students used for these programs were by Caucasian males. In addition, pictures used for the nursing and early childhood education programs only depicted females.</p> | <p>Diesel Technology, Nursing, and Early Childhood Education. A plan has been designed to collect stories from non-traditional students in these fields so that they can be shared on the website. Photos have proven more difficult to obtain in the current remote environment, but the committee is examining stock photography to use in these programs on the webpages.</p> <p>Planning longer term, the Vice President for Instruction will work with the Instructional Deans to do an annual review of all instructional program content, including photography online and in promotional and advertising materials to ensure they portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities. If a program</p> | <p>Nicole.lacroix@ghc.edu 360-538-4010</p> | | | |
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| | | is found to have photography that perpetuates stereotypes, the VPI will address it with the program and the marketing committee to design a plan to update the content. | | | | |
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Required Action:

The college should review pictures and illustrations contained in promotional and advertising material, and on its website, and ensure they portray a variety of individuals of different sexes, colors, national origins, and individuals with disabilities. The college should take measures to ensure material being used does not contain pictures that perpetuate stereotypes.

(xxiv) Services to Communities with Person of Limited English Proficiency:

If a recipient's service area contains a community with person of limited English proficiency, information must be available to that community in its language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|---|--|-------------|------------------|-------------------|
| C.vi | The college acknowledges it serves Spanish speaking community members but offers a very limited number of recruitment materials in Spanish. | <p>The college is working to identify funding to hire a Spanish language translator to begin work on all documents and recruitment materials.</p> <p>The college Institutional Effectiveness, Research, and Planning department will review data annually to determine if there are changes in demographics and if resources should</p> | Dr. Jennifer Alt VPSS Jennifer.alt@ghc.edu 360-538-4067 | March 2021 | | |

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| | | be designated to serve additional communities. They will provide an update to the executive team of the findings annually. | | | | |
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Required Action:

The college should evaluate what communities of limited English proficiency it currently serves and begin the process of translating recruitment and promotional materials to those languages. In addition, the college should perform periodic assessments of the community it serves to determine if new groups and communities have moved to the area and to determine if materials should be offered in any other languages.

D ADMISSIONS

Admission policies, procedures, and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex, or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin, sex, or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental, or disability status should be avoided.

(xix) Discriminatory Criteria:

A recipient may not judge candidates for admission to career and technical education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex, or disability. If such disproportionate exclusion occurs, the criteria or standards must be validated as essential to participation.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|----------------------|------------------------|-------------|------------------|-------------------|
| D.i | The investigation did not reveal any evidence of a violation. | | | | | |

(xx) Preadmission Inquiries:

Recipients must avoid preadmission inquiries about marital, parental, or disability status.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------|---|---|---|-------------|------------------|--|
| D.ii | A review of the college's paper Application for Admission (supplemental page) found the college is requesting the student's familial status under "What is your current family status." | The college has removed the paper form application from distribution. The only application a student may use to apply to the college is the online application, which has all appropriate language as it is the state application for the community college system. | Kari Collen Dean of Student Access & Success Kari.collen@ghc.edu 360-538-4121 | April 2020 | March 2020 | Non-Applicable. Removal of form completes requirement. |

Required Action:

The college should remove any questions relating to student marital, parental and/or disability status from admission forms and applications. If information regarding a student's status is required, the question can be included in forms completed by the student after acceptance to the college.

(xxi) Disabled & Employment Limitation:

A recipient must not deny access to vocational and academic programs or courses to students with disability on the basis that employment opportunities in any occupation or profession may be more limited for disabled persons than for nondisabled persons.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------|--|----------------------|------------------------|-------------|------------------|-------------------|
| D.iii | The review did not reveal any evidence of a violation. | | | | | |

(xxii) LEP & Benefit Limitation:

A recipient may not restrict admission to vocational programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from career and technical education to the same extent as students whose primary language is English.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.iv | The review did not reveal any evidence of a violation. | | | | | |

(xxiii) Preadmission Tests:

Postsecondary admission's tests are selected and administered in such a way that they accurately reflect the aptitude or achievement of an applicant with impaired sensory, vocal, or speaking skills, rather than measuring the disability (except where these skills are the factors the tests purports to measure).

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.v | The review did not reveal any evidence of a violation. | | | | | |

(xxiv) Disability Inquiries:

Postsecondary institutions may not make preadmission inquiries regarding disabling conditions except when taking remedial steps to increase participation when underrepresentation is identified.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| D.vi | The review did not reveal any evidence of a violation. | | | | | |

E STUDENT FINANCIAL ASSISTANCE

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the College's nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests, or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination to access to total scholarships on the basis of sex, race, national origin, or disability.

(xiii) Financial Assistance Availability:

Financial assistance is available to all students regardless of sex, race, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.i | The review did not reveal any evidence of a violation. | | | | | |

(xiv) Sex Restricted Awards:

Sex restricted awards are made only when established by will, trust, bequest, or other legal instrument. The overall effect may not discriminate on the basis of sex.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| E.ii | The review did not reveal any evidence of a violation. | | | | | |

(xv) Equitable Financial Aid Information:

Information about financial assistance is equitably written and does not lead students to believe it is awarded on a discriminatory basis.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|--|-------------------------------|--------------------|-------------------------|--------------------------|
| E.iii | The review of financial aid information and materials distributed by the | All financial aid forms on the website and | Stacey Savino | July 2020 for all | | |

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| | college and on the college's, website appear to be equitably written without any indication of bias however, the review found the majority of the material and forms providing information and used by the department do not include a non-discrimination notice. | distributed via paper will be updated for the 2020-2021 academic year. For any print materials on campus including pamphlets, posters, flyers, etc., all will be updated with the nondiscriminatory policy within two months of return to physical campus after remote operations. | Assistant Dean for Financial Aid Stacey.savino@ghc.edu 360-538-4082 | financial aid web forms and paper forms for 2020-2021. 2 months after return to campus for all print materials (non forms) | | |
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Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscriminatory policy in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials, to include all financial aid forms and informational pamphlets made available to participants, students, applicants, or employees.

To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. As required, the statement must contain the identification by name or title, address, and telephone number of the employee or employees responsible for coordinating compliance efforts. This statement should be included on all financial aid materials distributed to students and community members.

(xvi) LEP Financial Aid Information:

National origin minority persons with limited English language skills must receive information about financial assistance in their own language.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|---|--------------------------|-------------|------------------|-------------------|
| E.iv | The college has acknowledged it serves communities with limited English language skills however, none | The college is working to identify funding to hire a Spanish language | Dr. Jennifer Alt VPSS | March 2021 | | |

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| | <p>of the financial aid forms or informational brochures are available in other languages. In addition, the department does not have staff members proficient in Spanish.</p> | <p>translator to begin work on all documents and recruitment materials, including those in financial aid.</p> <p>The college Institutional Effectiveness, Research, and Planning department will review data annually to determine if there are changes in demographics and if resources should be designated to serve additional communities. They will provide an update to the executive team of the findings annually.</p> <p>The college will create and distribute guidelines on how individuals who are not proficient in English will be served. These guidelines will include directions notifying employees when an informal interpreter is not appropriate, and how to access translation and interpretation services. These guidelines will be created by members of</p> | <p>Jennifer.alt@ghc.edu 360-538-4067</p> | | | |
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| | | the Diversity Advisory Council. | | | | |
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Required Action:

The college should adopt a method to determine what communities of limited English language skills it serves and make financial aid information and forms available in those languages. In addition, the college should periodically reassess its community to determine if there are changes in the demographics and to ensure financial aid information is available to all community members who are not native English speakers. Finally, the college should establish guidelines and provide tools on how staff should communicate with individuals with limited English proficiency (i.e. use of a bi-lingual staff or student, use of an interpreter, etc.) to include instructions on when an official versus an informal interpreter is appropriate.

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| F COUNSELING AND PREVOCATIONAL PROGRAMS |
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Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

(xiii) Counseling Materials & Activities:

Recipients must ensure that counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|---|--|-------------|------------------|-------------------|
| F.i | Interviews with students and staff found students often have difficulties finding academic counselors with time to assist them and often receive erroneous information from counselors. The college only employs two full-time counselors who provide a wide range of counseling services to | The college has an Advising Committee. The Committee will be tasked with researching best practices in advising and recommending a training program to be | Dr. Jennifer Alt VPSS Jennifer.alt@hc.edu 360-538-4067 | March 2021 | | |

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|--|---|---|--|--|--|--|
| | <p>include academic, career, and mental health counseling. The majority of academic counseling is performed by faculty members as part of their collective bargaining agreement. Faculty members do not receive any training for this task. Interviews with staff and students found that although a large portion of those providing counseling services provide exemplary services to students, some are not as accommodating or properly trained for the task. Several students interviewed stated they had received incorrect information from an advisor, which for some students led to taking unnecessary classes. In addition, some students complained it was difficult to schedule advising appointments with some advisors. Many students added that when they finally found another advisor (usually a faculty member in their area of study), they were much happier with the assistance they received. Since lack of adequate and qualified advisors disproportionately effects students from protected groups, non-traditional students, and individuals from minority populations this limitation in advising services could have the effect of discriminating on the basis of a student's membership in protected and/or minority group.</p> | <p>implemented at GHC for all advisors.</p> <p>The Committee will also do a program review of the current advising program, including how students are assigned to advisors and how to better track student experiences in advising and allow a space for complaints to be received so that additional training may be implemented.</p> | | | | |
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Required Action:

The college should take steps to provide training to employees performing advising services. In addition, we recommend the college take steps to better match students, based on their fields of study and interest, with faculty members in related programs to ensure information students receive is accurate and useful. Finally, we recommend the college track student experiences and complaints to identify which faculty members may require additional training to better serve students.

(xiv) Directing or Profiling:

Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Recipients must ensure that counselors do not direct or urge any student to enroll in a particular field or program or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| F.ii | The review did not reveal any evidence of a violation. | | | | | |

(xv) Directing Toward Restrictive Career:

Recipients may not counsel disabled students toward more restrictive career objectives than non-disabled student with similar abilities and interests.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| F.iii | The review did not reveal any evidence of a violation. | | | | | |

(xvi) Disproportionate Enrollment:

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Recipients must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
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| F.iv | The review did not reveal any evidence of a violation. | | | | | |
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G SERVICES FOR STUDENTS WITH DISABILITIES

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function in some settings and that the nondisabled should not put them in a position where they might be uncomfortable. However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

(xxviii) SWD Access to Programs:

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity solely on the basis of their disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.i | The review did not reveal any evidence of a violation. | | | | | |

(xxix) Equipment Barriers:

Disabled students must not be excluded from vocational career or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--|-----------------------------------|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
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| G.ii | The review did not reveal any evidence of a violation. | | | | | |
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(xxx) Postsecondary 504 Services:

If academic requirements that are essential to the career and technical program have the effect of discriminating against applicants or students on the basis of a disability, the institution should provide academic adjustments, including modified course examinations and auxiliary aids and services, for qualified disabled persons to complete the degree program and/or licensure requirements.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.iii | The review did not reveal any evidence of a violation. | | | | | |

(xxxii) Services for Students with Disabilities:

Postsecondary recipients need to adjust academic requirements to meet the needs of individual students with a disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.iv | The review did not reveal any evidence of a violation. | | | | | |

(xxxiii) Evaluation Accommodations & Modifications:

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that a disabled student's aptitude or achievement levels or other relevant factors are measured and not the disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.v | The review did not reveal any evidence of a violation. | | | | | |

(xxxiii) Equitable Housing Opportunities:

Students receive equitable opportunities from housing programs regardless of sex, national origin, color, race, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.vi | Not Applicable – The college does not have dormitories and does not provide housing. | | | | | |

(xxxiv) Comparable & Accessible Housing:

The institution offers students with disabilities on-campus or off-campus housing that is comparable, convenient, and accessible to students with disabilities, at the same cost and under the same conditions as offered to nondisabled students.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.vii | Not Applicable – The college does not have dormitories and does not provide housing. | | | | | |

(xxxv) Off-Campus Housing:

If an off-campus housing service is provided for students by arrangement with the institution, there is evidence that it is serving all students regardless of their race, sex, color, national origin, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|---------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| G.viii | The investigation did not reveal any evidence of a violation. | | | | | |

(xxxvi) Landlords:

The institution does not cooperate with any landlord who discriminates on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| G.ix | Not Applicable — The college does not cooperate or work with any landlords | | | | | |

H ACCESSIBILITY

Recipients may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities are inaccessible to or unusable by persons with disabilities. Under federal and state law, what constitutes an accessible facility depends on when the facility was constructed or altered, as follows:

- Existing Facilities (constructed or initiated prior to 6/4/1977) — must ensure each program is fully accessible.
- Between 6/4/1977 — 1/17/1991 — new construction must meet or exceed American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI 117-1 (1961 R-1971)).
- On or after 1/18/1991: new construction must meet or exceed Uniform Federal Accessibility Standards (UFAS). Including all parking lots.
- On or after 1/27/1992: new construction and alterations must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD). Federal law gave public entities an option between UFAS or ADASAD, but Washington state law requires ADAAG (Americans with Disability Act Accessibility Guidelines).
- Between 9/15/2010 and 3/15/2012 — may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 ADA Standards.
- On or after 3/15/2012: new construction must meet or exceed American with Disabilities Act Standards for Accessible Design (ADASAD), 2010 Standards.

See Attachment A for results of review.

J COMPARABLE FACILITIES

Separate changing rooms, showers, and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male and female students should be located in similar proximity to the associated classroom, shops, or laboratories.

See Attachment A for results of review.

K WORK STUDY, COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICE TRAINING

An educational institution not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of sex, race, national origin, or disability of a student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status. It is recommended that agencies have written agreements whereby the cooperating worksites indicate that they will not discriminate and that they understand the school or college will not work with any business that does. The institution should periodically review these written agreements, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(vii) Work Study & Job Placement:

Opportunities in work study, cooperative education, and job placement programs are available to all students regardless of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| K.i | The review did not find any evidence of a violation. | | | | | |

(viii) Employer Agreements:

A recipient that assists employers or prospective employers in making employment opportunities available to students must ensure the employer does not discriminate on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment of work tasks, hours of employment, levels of responsibility, and/or pay.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| K.ii | The review did not reveal any evidence of a violation. | | | | | |

L APPRENTICESHIP TRAINING PROGRAMS

In the same way that an employer may not discriminate and the educational agency may not work with any that discriminate, the educational agency also has the responsibility to ensure that entities sponsoring apprenticeship programs, such as unions, do not discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of a student. Written agreements are recommended wherein the apprenticeship program indicates it will not discriminate on these bases. The agency should review apprenticeship assurance forms, the assignments of students presently in such programs, and the placement process to see whether any such patterns exist.

(iv) Apprenticeship Agreements:

Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. A written agreement between the institution and the labor union or other sponsor should include an assurance of nondiscrimination on the basis of race, color, national origin, sex, and disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|--|---|--------------------|-------------------------|--------------------------|
| L.i | The college is in a partnership with a pipe-fitter union for an apprenticeship program. The agreement is not in writing and candidates for the program are selected by the union. Candidates are required to pass an Electrical Training Alliance NJATC aptitude test to qualify for the apprenticeship. The employer states the pre-test satisfies the state's requirements for fair and equal treatment. However, non-discrimination laws for employers does vary from requirements for educational institutes and as such, the college can not be certain that the selection process used for candidates | The college is not in a partnership with a pipe-fitter union. The college is in an agreement with several PUDs for a Registered Lineman Apprenticeship. Selection of the students is completed by the twelve (12) PUDs and students are trained onsite at the Grays Harbor PUD in Aberdeen, WA. | Dr. Lucas Rucks Dean for Workforce Education Lucas.rucks@ghc.edu 360-538-4013 | March 2021 | | |

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| | <p>meets Department of Education's criteria. A review of demographics for the program found all participants selected for the current year's program are Caucasian males, with the exception of one individual who did not disclose his gender.</p> | <p>When the apprenticeship agreement is renewed with the GH PUD, new language will be added to encourage their selection process take into consideration lack of diversity of their current cohorts (3-year Program with new students added each Fall).</p> | | | | |
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Required Action:

Although not required, the college should consider entering into a written agreement with the apprenticeship program in which the non-discrimination requirements for the college and the expectations in this regard for its partner institutions are clearly communicated. In addition, the college should maintain demographics of students selected and rejected for the program to ensure the program is not engaging in discrimination. Finally, the college should review the apprenticeships selection criteria to ensure the process does not prevent or discourage any minority or protected group from participation.

M EMPLOYMENT

Recipients are prohibited from engaging in any employment practices that discriminate against employees or applicants for employment on the basis of sex, disability, race, color, or national origin. These specific prohibitions include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

(xiii) Employment Practices:

Recipients may not engage in any employment practices that discriminate against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|------------|---|----------------------|------------------------|-------------|------------------|-------------------|
| M.i | The investigation did not reveal any evidence of a violation. | | | | | |

(xiv) Employment Recruitment Notification:

The recipient must notify every job applicant that it does not discriminate on the basis of race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|--|---|--------------------|-------------------------|---|
| M.ii | <p>The review found the college Human Resources website and job descriptions do not include a complete non-discrimination statement as required. Specifically:</p> <ul style="list-style-type: none"> • The Human Resource webpage’s non-discrimination notice does not include required information regarding the Title IX and disability coordinator; • The Student Job Application does not include a non-discrimination notice; and • A review of 5 position openings found that all non-discrimination notices posted on the job descriptions used the work gender instead of sex and did not include required coordinator information. | <p>The Human Resources website has the required non-discrimination notice posted (www.ghc.edu/hr).</p> <p>The student job application has a non-discrimination notice on it (https://www.ghc.edu/sites/default/files/AboutGHC/documents/hr/workstudyapp.pdf).</p> <p>All position openings have non-discrimination notices posted on them using the word “sex” instead of “gender” and have the required coordinator information.</p> <p>The non-discrimination notice will be posted on all future bulletins, announcements, publications, catalogs, application forms, or other recruitment</p> | <p>Darin Jones Chief Executive of Human Resources Darin.jones@ghc.edu 360-538-4234</p> | <p>June 2020</p> | <p>6/19/2020</p> | <p>Confirmed by review of website and attached application.</p> |

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| | | materials that are made available to participants, students, applicants, community members, and/or employees. | | | | |
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Required Action:

In accordance with the Title IX and Section 504 regulations, recipients are required to include a statement of nondiscrimination on their main website and in any bulletins, announcements, publications, catalogs, application forms, or other recruitment materials that are made available to participants, students, applicants, community members, and/or employees. To meet this requirement, the college should create and use one standard non-discrimination statement that includes all required language and meets federal requirements as described at <http://www2.ed.gov/about/offices/list/ocr/docs/nondisc.html>. The statement must contain the identification of the employee or employees responsible for coordinating compliance efforts by name/title, address, and telephone number. An email address is not currently required but encouraged. OCR requires coordinator(s) be identified by name on the college’s website however, use of title only is allowed in printed material.

(xv) Salary Scales & Assignments:

An organization should establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|--------------|--|----------------------|------------------------|-------------|------------------|-------------------|
| M.iii | The review did not reveal any evidence of a violation. | | | | | |

(xvi) Equal Opportunities & Reasonable Accommodations:

Recipients must provide equal employment opportunities for teaching and administrative positions to disabled applicants who can perform the essential functions of the positions and make reasonable accommodations for the physical or mental limitation of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship and therefore be unreasonable.

| | Evidence of Non-Compliance | Resolution/Work Done | Individual Responsible | Target Date | Completion Date: | Confirmation Date |
|-------------|---|-----------------------------|-------------------------------|--------------------|-------------------------|--------------------------|
| M.iv | The review did not reveal any evidence of non-compliance. | | | | | |

| 08 Accessibility | | | | | | |
|------------------|----------------------------|------------|-----------------------|-------------|-----------------|--------------|
| | Compliance during visit? | No | | | | |
| ID | Evidence of Non-Compliance | Resolution | Person(s) Responsible | Target Date | Completion Date | Confirm Date |

| | | | | | | | |
|-------|---------------------------|---|--|--|-------------|----------------|--|
| S-1 | Tracking Number | ADA0002 | <p>One accessible space will be created immediately adjacent to the building by the student entrance to the North Shop.</p> | <p>Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154</p> | August 2020 | September 2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (020A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | ADA for 1 to 25 stalls | | | | | |
| | Near Building | Voktek | | | | | |
| | Non-Compliance | The lot does not have the required number of accessible parking spaces. | | | | | |
| | Required Action | Provide at least one accessible parking space. At least one space must be van accessible. | | | | | |
| Notes | Need one accessible stall | | | | | | |

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|-------|---|--|--|--|-------------|----------------|--|
| S-2 | Tracking Number | ADA0005 | One of the accessible spots will be converted to a van accessible spot. Total accessible space count will remain 14, split between 11 standard accessible and 3 van accessible. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (020A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | Van accessible | | | | | |
| | Near Building | Schermer Instructional | | | | | |
| | Non-Compliance | The required number of van accessible spaces are not provided. | | | | | |
| | Required Action | Provide at least one van accessible space per six accessible spaces. | | | | | |
| Notes | 14 Accessible, 2 van accessible. One additional van space required. | | | | | | |
| S-3 | Tracking Number | ADA0006 | Parking spaces will be reconfigured and appropriately striped to meet ADA standards. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (020A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished | | | | | |

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|-----|-----------------|---|---|--|-------------|----------------|--|
| | | in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | Car and van Widths | | | | | |
| | Near Building | Hillier Union Building | | | | | |
| | Non-Compliance | The accessible parking spaces do not comply with the space width and access aisle requirements. | | | | | |
| | Required Action | Provide accessible parking spaces that comply with the space width and access aisle requirements. | | | | | |
| | Notes | No striping for access isle. Missing signage and accessible symbol. Accessible signs at 24" above ground. Provide correct striping and signage for two accessible spaces. | | | | | |
| S-4 | Tracking Number | ADA0007 | Appropriate signage will be posted at the appropriate height after spaces are reconfigured per | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (020A) | | | | | |

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|-----|--------------------------|--|---|--|-------------|----------------|--|
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | regulations cited in S-3. | | | | |
| | Space | Parking | | | | | |
| | Component | Signs | | | | | |
| | Parameter | ADA restricted | | | | | |
| | Near Building | Hillier Union Building | | | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | | |
| | Notes | Sign mounted at 24". Missing van accessible sign. Provide sign at correct height with van accessible sign. | | | | | |
| S-5 | Tracking Number | ADA0008 | Parking spaces will be reconfigured and appropriately striped to meet ADA standards. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (020A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |

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|-----|--------------------------|---|---|--|-------------|----------------|--|
| | Space | Parking | | | | | |
| | Component | Stall | | | | | |
| | Parameter | Car and van Widths | | | | | |
| | Near Building | Bishop | | | | | |
| | Non-Compliance | The accessible parking spaces do not comply with the space width and access aisle requirements. | | | | | |
| | Required Action | Provide accessible parking spaces that comply with the space width and access aisle requirements. | | | | | |
| | Notes | Missing access isles between spaces. Missing accessible signs. Two must be van spaces with signs mounted at 60" minimum. | | | | | |
| S-6 | Tracking Number | ADA0009 | Appropriate signage will be posted at the appropriate height after spaces are reconfigured per regulations cited in S-5. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 | |
| | Campus | Main Campus | | | | | |
| | Location | Site - Main Campus (020A) | | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | | |
| | Space | Parking | | | | | |

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|-----|--------------------------|---|---|--|-------------|----------------|
| | Component | Signs | | | | |
| | Parameter | ADA restricted | | | | |
| | Near Building | Bishop | | | | |
| | Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | |
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | |
| | Notes | Signs mounted at 48". | | | | |
| S-7 | Tracking Number | ADA0010 | ADA space will be relocated to adjacent lot with compliant slope. Striping and signage compliant with current standards will be installed. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (020A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Parking | | | | |
| | Component | Stall | | | | |
| | Parameter | Access aisles - 90 degree parking stalls | | | | |
| | Near Building | Heavy Equipment Shop | | | | |
| | Non-Compliance | Parking spaces access isles are not accessible because | | | | |

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| | | they are not the correct width or location. | | | | |
| | Required Action | Provide parking access aisles that meet the minimum requirements for width and do not require individuals to travel behind parked vehicles. | | | | |
| | Notes | Spot slope 4 degrees. Accessible spot can be moved to adjacent lot south of this area. | | | | |
| S-8 | Tracking Number | ADA0011 | Parking spaces will be reconfigured and appropriately striped to meet ADA standards. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | September 2020 |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (020A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Parking | | | | |
| | Component | Stall | | | | |
| | Parameter | Car and van Widths | | | | |
| | Near Building | Auto/Weld Technology | | | | |
| | Non-Compliance | The accessible parking spaces do not comply with the space width and | | | | |

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| | | access aisle requirements. | | | | |
| | Required Action | Provide accessible parking spaces that comply with the space width and access aisle requirements. | | | | |
| | Notes | Missing access isle striping on level portion of space. | | | | |
| S-9 | Tracking Number | ADA0022 | <p>Table will be extended to provide 19” minimum clearance at one end. This will be done by removing existing 2”x8” and replacing with longer lumber which will provide the necessary overhang.</p> | <p>Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154</p> | <p>August 2020</p> | <p>October 2020</p> |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (020A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | General Site | | | | |
| | Component | Site built-in dining or work surfaces | | | | |
| | Parameter | Knee clearance | | | | |
| | Near Building | Lib | | | | |
| | Non-Compliance | There is not enough knee clearance under the table. | | | | |
| | Required Action | Provide adequate knee clearance under a minimum of five percent of all tables provided. At | | | | |

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| | | least one table must comply with the requirements. | | | | |
| | Notes | The knee space is 12" deep. | | | | |
| S-10 | Tracking Number | ADA0026 | Signage will be installed directing students/public to ADA compliant routes/entrances. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | November 2020 |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (020A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Site Access route | | | | |
| | Component | Ramps | | | | |
| | Parameter | Return landings mid-ramp | | | | |
| | Near Building | Schermer Instructional | | | | |
| | Non-Compliance | The ramp return landing is too small. | | | | |
| | Required Action | Provide a landing at the ramp return that meets the minimum size requirements for an accessible ramp. | | | | |
| Notes | The ramp landings are 48" deep. The ramp runs exceed 50'. The ramp must be modified or a sign must be placed | | | | | |

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| | | to direct students to the accessible building entrance on the 2nd level. A sign must also be placed at the bottom of the ramp indicating that it is not accessible and direct students to an accessible route. | | | | |
| S-11 | Tracking Number | ADA0030 | Signage will be installed directing students/public to an accessible route to the building entrance. | Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154 | August 2020 | November 2020 |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (020A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Site Access route | | | | |
| | Component | Walks / paths | | | | |
| | Parameter | Slope | | | | |
| | Near Building | Lifsci | | | | |
| | Non-Compliance | The surface slope is too steep. | | | | |
| Required Action | An accessible route including walkways (with a slope less than 1:20 slope) and / or accessible ramps must be provided. | | | | | |

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|------|--------------------------|--|---|--|-------------|---------------|
| | Notes | The path slope in front of the 500 building is 4 degrees. Either the path needs to be modified into a ramp (install rails) or a sign must be installed at the bottom of the adjacent ramp directing students to an accessible entrance on the lower level of the 500 building. | | | | |
| S-12 | Tracking Number | ADA0031 | <p>A civil engineer was engaged to review. This area will be demolished and replaced with ADA compliant ramp. Construction documents available upon request.</p> | <p>Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154</p> | August 2020 | November 2020 |
| | Campus | Main Campus | | | | |
| | Location | Site - Main Campus (020A) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Site Access route | | | | |
| | Component | Walks / paths | | | | |
| | Parameter | Slope | | | | |
| | Near Building | Physed | | | | |
| | Non-Compliance | The surface slope is too steep. | | | | |
| | Required Action | An accessible route including walkways | | | | |

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|----------------|---|--|---|--|-------------|--|
| | | (with a slope less than 1:20 slope) and / or accessible ramps must be provided. | | | | |
| | Notes | Walkway to student food bank is 5 degrees. It may be possible to modify this route by adding handrails and turning it into a ramp. | | | | |
| S-13 | Tracking Number | ADA0047 | <p>Appropriate signage will be installed at the appropriate heights.</p> <p>12/20 Update: This will be addressed prior to March 2021.</p> | <p>Keith Penner Chief of Campus Operations Keith.penner@ghc.edu 360.538.4154</p> | August 2020 | |
| | Campus | Riverview Ed. Center | | | | |
| | Location | Site - Riverview Ed. Center (020C) | | | | |
| | Yr Built \ Orig Standard | Estimated renovation finished in 1995 \ 1991 ADA Standards | | | | |
| | Space | Parking | | | | |
| | Component | Signs | | | | |
| | Parameter | ADA restricted | | | | |
| | Near Building | Riverview Education Ctr | | | | |
| Non-Compliance | The accessible parking signs do not comply with the accessibility requirements. | | | | | |

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|--|-----------------|---|--|--|--|--|--|
| | Required Action | Provide the required accessible parking signs at each accessible parking space. | | | | | |
| | Notes | Missing signs at each space. One must be for van. | | | | | |