2017 - 18 Educational Equity Review On-Site Manual for School Districts

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State of Iowa

Department of Education

Grimes State Office Building
400 E. 14th Street
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It is the policy of the Iowa Department of Education not to discriminate on the basis of race, creed, color, sexual orientation, gender identity, national origin, sex, disability, religion, age, political party affiliation, or actual or potential parental, family or marital status in its programs, activities, or employment practices as required by the Iowa Code sections 216.9 and 256.10(2), Titles VI and VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000d and 2000e), the Equal Pay Act of 1973 (29 U.S.C. § 206, et seq.), Title IX (Educational Amendments, 20 U.S.C.§§ 1681 – 1688), Section 504 (Rehabilitation Act of 1973, 29 U.S.C. § 794), and the Americans with Disabilities Act (42 U.S.C. § 12101, et seq.). If you have questions or complaints related to compliance with this policy by the Iowa Department of Education, please contact the legal counsel for the Iowa Department of Education, Grimes State Office Building, 400 E. 14th Street, Des Moines, IA 50319-0146, telephone number: 515-281-5295, or the Director of the Office for Civil Rights, U.S. Department of Education, Citigroup Center, 500 W. Madison Street, Suite 1475, Chicago, IL 60661-4544, telephone number: 312-730-1560, FAX number: 312-730-1576, TDD number: 877-521-2172, email: mailto:OCR.Chicago@ed.gov.

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Introduction

This Manual is provided as a guide for districts as they prepare for an on-site Equity Visit. While districts are not required to complete the Manual prior to the visit, the information provides a guideline for the information the team will look for in document review prior to the visit and in interviews while on-site. Much of the guidance in this manual is taken from documents from the Office for Civil Rights (OCR).

More information on OCR is provided on their website:
http://www2.ed.gov/about/offices/list/ocr/index.html

More information regarding equity visits can be found on the Equity Education webpage of the Iowa Department of Education website:
https://www.educateiowa.gov/pk-12/accreditation-program-approval/equity-education

State education agencies are required to develop methods of administration for assuring school district's compliance with federal civil rights laws. These methods of administration are to include:

State policy reviews

- Desk audits of district's enrollment and staffing data as well as other equity data
- On-site reviews of local education agencies to assess their degree of compliance
- Technical assistance on equity issues
- Biennial program reports to the United States Office for Civil Rights

The regulatory authority for these requirements resides in the following locations:

- Title II of the Americans with Disabilities Act (ADA) – 28 CFR Part 35: This Act prohibits discrimination on the basis of disability in all services, programs, and activities of the public and private sector regardless of funding source.
- Section 504 of the Rehabilitation Act of 1973 – 34 CFR Part 104: "No otherwise qualified persons with disabilities shall, solely by reason of their disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."
- Title VI of the Civil Rights Act of 1964 – 34 CFR Part 100: "No person in the United States shall, on the grounds or race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.
- Title IX of the Education Amendments of 1972 – 34 CFR Part 106: "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 education program or activity receiving federal financial assistance."
- Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination in Vocational Education Programs of 1979 – 34 CFR Part 100 Appendix B: Enrollment in Career and Technical Education Programs disaggregated by race, national origin, sex and disability
- Age Discrimination Act of 1975 – 34 CFR Part 110

The Applicable Requirements for each regulation are included in the related section of the Manual.

The eight areas of equity review have been established by OCR. This Manual provides information for all eight areas in eight sections. The eight sections correspond with the Equity Letter of Finding (or Equity Report) the district will receive which summarizes the team findings based on document review and on-site interviews.

Section I: Administrative Requirements

The following section assesses the district's compliance with the process requirements of Title IX of the Education Amendments of 1972 (Sex), Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (Disability), and the Office for Civil Rights Guidelines of 1979 for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs. The process requirements include the adoption of nondiscrimination / equity-related policies, annual and continuous requirements to notify students, staff, parents, and community members, the assignment of an equity coordinator, and the adoption and implementation of a civil rights-related grievance procedure.

A policy of nondiscrimination represents the district's commitment to equity. It provides documentation that the district is committed to provide educational opportunities for all its students.

The law requires that students, staff, parents, and community members be informed about the nondiscrimination policy, the identity and contact information for the equity coordinator, and information about the grievance procedure on an annual and continuous basis. This information must be disseminated to all stakeholders in a school district through the community newspaper, the district's major annual publications, and the district's website. Major publications include: student, parent, staff, and coaches' handbooks; registration handbooks and course descriptions; major plans and reports of the school district such as the Annual Progress Report and the School Improvement Plan; and district brochures. One of the responsibilities of the equity coordinator is to monitor district documents and the website to ensure that the notifications are consistent and current.

The role of the equity coordinator is to coordinate the district's efforts to comply with equity-related requirements. Not only must the coordinator be assigned, but there must be evidence that the coordinator is functioning proactively, not just responding to complaints. It is important that coordinator's equity responsibilities be reflected in his/her job description and evaluation.

The grievance procedure provides a fair and timely process for addressing grievances related to the policy. It must be clearly delineated and communicated to staff, to students, and to parents. One of the responsibilities of the equity coordinator is to facilitate the grievance process.

Refer to the document "2016-2017 Guidance for Nondiscrimination Notices" for a process to check for correct policies and notifications.

A. Annual Notice of Nondiscrimination Policy

Applicable Requirements: Guidelines Section IV.O; 34 C.F.R. §100.6(d)

Nondiscrimination Policy Issues

The law requires districts to have board-adopted policy statements on nondiscrimination in programs and in employment. The policies are required to cover the protected classes included in the checklists above. The policies must be adopted by the school board and must be included in the official Board Policy Book. The policies should be reviewed and revised or reaffirmed every five (5) years per Chapter 12 requirements.

Comments:

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1. The School Board has adopted a nondiscrimination policy for programs and employment.
   _____Yes
   _____No

   a. Policy covers race _____Yes _____No
   b. Policy covers color _____Yes _____No
   c. Policy covers national origin _____Yes _____No
   d. Policy covers sex _____Yes _____No
   e. Policy covers disability _____Yes _____No
   f. Policy covers religion _____Yes _____No
   g. Policy covers creed _____Yes _____No
   h. Policy covers age (required for employees only) _____Yes _____No
   i. Policy covers marital status (required for programs only) _____Yes _____No
   j. Policy covers sexual orientation _____Yes _____No
   k. Policy covers gender identity _____Yes _____No

   l. Policy covers socioeconomic status (required for programs only) _____Yes _____No

Source:
\ *Programs: Document Review Checklist I.A.1.*
\ *Employment: Document Review Checklist I.A.2.*

Annual Notice of Nondiscrimination

Applicable Requirements: Guidelines Section IV.O; 34 C.F.R. §100.6(d)

Nondiscrimination Issues

Federal laws (Title IX and Section 504) require that the agency use effective methods to inform parents, employees, students, and applicants for employment, of the nondiscrimination policy, the identity, and contact information for the equity coordinator, and information about the grievance procedure and how

it can be accessed. This is to be done on an annual and continuous basis. Major annual publications distributed by the school and the district's website must include this information. Notifications must be current and consistent. Notification should be on the website homepage or linked to the homepage with an obvious link such as "Nondiscrimination" or "Equity Notification".

Comments:

Annual Notice Requirements:

Section IV of the 1979 Guidelines for Eliminating Discrimination in Vocational Education Programs requires recipients of federal funding that operate vocational education programs to provide an annual notice of nondiscrimination prior to the beginning of each school year to:

- Students
- Parents
- Employees
- General public

The annual notice of nondiscrimination must include a brief summary of the recipient's program offerings and admissions criteria for career and technical education programs (CTE). It shall also include the name, title, address, phone number and email address of person(s) designated to coordinate Title IX and Section 504 compliance. Announcement of this policy of nondiscrimination must be published in forums that will allow the entire public to view it, such as:

- Local newspapers
- District publications
- District website, and/or other media that reach the general public, including program beneficiaries, national origin persons with limited English language skills, and persons with disabilities.

If the district/agency's service area contains a community of national origin minority persons with limited English language skills, the annual notice must be disseminated to that community in its language and 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 the recipient's CTE programs.

Program offerings and areas of study are defined as the six service areas:

- Agricultural Education
- Business Education
- Health Occupations Education
- Family and Consumer Sciences Education
- Industrial Education
- Marketing Education

Sample Annual Notice of Nondiscrimination Policy Statement:

The notice shall include:

The [*Name of district*] offers career and technical programs in the following service areas of study:

[*List CTE Service Areas*]

It is the policy of the [Name of district] Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. There is a grievance procedure for processing complaints of discrimination. If you have questions or a grievance related to this policy please contact the district's Equity Coordinator, Name, Title, Address, Phone Number, E-mail Address.

(The notice may include): Director of the Office for Civil Rights U.S. Department of Education, Citigroup Center, 500 W. Madison Street, Suite 1475, Chicago, IL 60661-7204, Telephone: (312) 730-1560 Facsimile: (312) 730-1576, Email: OCR.Chicago@ed.gov

2. The School Board has adopted a nondiscrimination policy for programs and employment.
   \ Local newspapers
   \ District publications
   \ District website, and/or other media that reach the general public, including program beneficiaries, national origin persons with limited English language skills, and persons with disabilities.

Source:
\ *Document Review Checklist I.A.3.*

3. The annual notification included all of the required protected classes for nondiscrimination in both programs and employment, the coordinator(s')'s name(s) and contact information, and notice of the grievance procedure:
   _____Yes
   _____No

Source:
\ *Document Review Checklist I.A.3.*

B. Continuous Notice of Nondiscrimination Policy

Applicable Requirements: 34 C.F.R. §§100.6(d), 104.8, and 106.9; and 28 C.F.R. 35.106

Continuous Notice Issues

Continuous Notice Requirements:
Title IX, Section 504, and Title II regulations require that notices of nondiscrimination be made on a continuous basis. All recipients must implement specific and continuing steps to notify:

\ Students and parents
\ Employees
\ Applicants for admission and employment
\ Sources of referral of such applicants
\ Unions with collective bargaining agreements
\ Participants, beneficiaries, and applicants, including persons with impaired vision and/or hearing

Continuous Notice requirements may be met by prominently publishing the nondiscrimination statement in:

\ Announcements
\ Application form
\ Bulletins
\ Course Catalog
\ District website and electronic publications
\ Local newspapers
\ Newsletters
\ Notices posted on campus
\ Publications containing general information
\ Recruitment materials
\ Registration materials
\ School calendar/planner
\ Staff, student, parent and coaches' handbooks
\ Written materials distributed to students and prospective students
\ Additional languages

If the district/agency's service area contains a community of national origin minority persons with limited English language skills, the annual notice must be disseminated to that community in its language and 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 the recipient's CTE programs.

It is best practice to post the continuous notice on the district website. The notice must appear prominently on the home page or within one click on an obvious link (i.e., Equity or Nondiscrimination tab.)

Sample Continuous Notice of Nondiscrimination Policy Statement:

The notice shall include:

It is the policy of the [*Name of District*] Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. There is a grievance procedure for processing complaints of discrimination. If you have questions or a grievance related to this policy please contact the district's Equity Coordinator, Name, Title, Address, Phone Number, E-mail Address

(The notice may include): Director of the Office for Civil Rights U.S. Department of Education, Citigroup Center, 500 W. Madison Street, Suite 1475, Chicago, IL 60661-7204, Telephone: (312) 730-1560 Facsimile: (312) 730-1576, Email: OCR.Chicago@ed.gov

4. The following documents contained the continuous notice of nondiscrimination which included all of the required protected classes for nondiscrimination in both programs and employment, the coordinator(s')'s name(s) and contact information, and notice of the grievance procedure:
   \ Newsletters
   \ District website and electronic publications
   \ Written materials distributed to students and prospective students
   \ Notices posted on campus
   \ Local newspapers
   \ Announcements
   \ Bulletins
   \ Course catalog
   \ Application form
   \ Recruitment materials
   \ Publications containing general information
   \ School calendar/planner
   \ Staff, student, parent and coaches' handbooks
   \ Registration materials

   Notices are stated consistently _____Yes _____No

Source:
\ *Document Review Checklist I.B.1.*

C. Designation of Coordinator(s)

Applicable Requirements: Guidelines Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Designation of Coordinators Issues:

Title IX, Section 504 and the ADA, require the district to designate an employee to coordinate the agency's activities to comply. While Title VI has no such requirement, it is considered best practice to include issues related to race, color and national origin in the coordinator's responsibilities. An agency may have a different coordinator for each law or consolidate the responsibilities under one employee. We encourage many small- and medium-sized districts to have no more than two (2) coordinators: one for employment and one for program. The coordinator(s) must be interviewed during the on-site visit. Usually it will be evident if they are aware of their responsibilities and actively functioning. Major annual publications must include the name, title, address, phone number and email address for the coordinator(s). Interviews with staff, parents, and students will show whether they are aware of the identity of the coordinator(s) and their responsibilities. If the coordinator has been active, there should be visible and documented evidence of that activity.

Districts must have at least one person designated and actually serving as the coordinator at all times. This includes coordination of the investigation of any complaints alleging noncompliance with or other actions prohibited by the civil rights laws. It may be a good practice for some larger school districts to designate multiple coordinators. The Coordinator's role should be independent to avoid any potential conflicts of interest. Designating a disciplinary board member, general counsel, dean of students, superintendent, principal, or athletics director as the coordinator may pose a conflict of interest. Designating a full-time coordinator will minimize the risk of a conflict of interest.

Coordinators must be given the authority to coordinate the recipient's civil rights compliance. Coordinators should coordinate the recipient's responses to all discrimination complaints, even if initially filed with or investigated by another office. Districts must not interfere with the coordinator's participation in complaint investigations and monitoring of the recipient's efforts to comply with and carry out its responsibilities under federal civil rights laws. Districts must ensure that coordinators are appropriately trained and possess comprehensive knowledge in all areas over which they have responsibility, including the recipient's policies and procedures. Starting in 2015, OCR's Civil Rights Data Collection asks for coordinators' names and contact information.

For more information on coordinators:

\ OCR Dear Colleague Letter on Title IX Coordinators (April 2015)
\ OCR Letter to Title IX Coordinators (April 2015)
\ OCR Title IX Resource Guide (April 2015)

5. The agency has designated employee(s) to coordinate district's activities related to the following federal and state equity requirements:
   \ Title IX Coordinator (sex equity) _____Yes _____No
   \ Section 504 / ADA Coordinator (disability equity) _____Yes _____No
   \ Title VI (race, color and national origin equity) _____Yes _____No

   Current Coordinator(s):
   Name A. _____ Position B. _____ B.
   A. _____ Phone A. B. _____

Source:

\ *Document Review Checklist I.C.1. and Equity Coordinator Interview*

6. There is documented evidence to show that the district has provided:
   a. The coordinator(s) with authority to fulfill the coordination responsibility.
   b. The coordinator(s) have no conflict of interest.
   c. If there are multiple coordinators, does one have overall responsibility?
   d. Are each coordinator's responsibilities clear?
   e. The coordinator has the qualifications, training, and time to address all complaints throughout the institution, including those raising Title IX issues.
   f. The coordinator coordinates recordkeeping.
   g. Ensure the coordinator(s) are equipped to recognize possible patterns of discrimination or identify any systemic problems in the school's response.

Source:
\ *Interviews*

7. There is documented evidence to show that the coordinator(s) is (are) active and functioning.
   _____Yes _____No

   This evidence includes the following:

\ Job description(s) that include equity responsibilities	_____Yes _____No
\ Communication with administrators	_____Yes _____No
\ Communication with staff	_____Yes _____No
\ Communication with students	_____Yes _____No
\ Communication with parents	_____Yes _____No
\ Reports to school board	_____Yes _____No
\ Agendas and minutes of SI Advisory Committee and/or the Equity Committee	_____Yes _____No
\ Information on district website	_____Yes _____No
\ Documentation of processed grievances	_____Yes _____No
\ Documentation of annual review and distribution of disaggregated attendance center, course, program enrollment, and extracurricular activity data	_____Yes _____No
\ Diversity on advisory committees	_____Yes _____No
\ Equity-related professional development	_____Yes _____No
\ Documentation of having received training on sexual harassment	_____Yes _____No
\ Results of most recent school climate survey if available	_____Yes _____No

Source:
Document Review Checklist I.C.2.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Grievance Procedure Issues

Districts must *adopt and publish* grievance procedures providing for prompt and equitable resolution of complaints alleging discrimination. Section 504 specifically requires that grievance procedures incorporate appropriate due process standards. The procedure need not have a particular name, however they need to be clear regarding what type of actions are covered by the procedure. Districts need not have a separate grievance procedure for each regulation or a separate procedure for sexual harassment. Districts with multiple grievance procedures must make clear when each should be used. The civil rights grievance procedure should align with the Title IX regulations and as such must apply to sex discrimination complaints filed by students against school employees, other students, or third parties. For more information on grievance procedures:

\ The Office for Civil Rights Dear Colleague Letter of April, 2011

8. There is a grievance procedure for processing complaints of discrimination based upon:

\ Procedure covers race _____Yes _____No
\ Procedure covers color _____Yes _____No
\ Procedure covers national origin _____Yes _____No
\ Procedure covers sex _____Yes _____No
\ Procedure covers disability _____Yes _____No
\ Procedure covers religion _____Yes _____No
\ Procedure covers creed _____Yes _____No
\ Procedure covers age (required for employees only) _____Yes _____No
\ Procedure covers marital status (required for programs only) _____Yes _____No
\ Procedure covers sexual orientation _____Yes _____No
\ Procedure covers gender identity _____Yes _____No

\ Procedure covers socioeconomic status (required for programs only) _____Yes _____No

Source:
\ *Document Review Checklist I.D.1. (Related IASB Sample Policies: 102 series)*

9. The grievance procedure(s) have been adopted by the school board.
_____Yes _____No School Board Policy No. _____

Source:
\ *Document Review Checklist I.D.1. (Related IASB Sample Policies: 102 series)*

10. The grievance procedure covers:
    a. Students _____Yes _____No
    b. Parents _____Yes _____No
    c. Employees _____Yes _____No
    d. Applicants for employment _____Yes _____No

Source:
\ *Document Review Checklist I.D.1.*

11. The civil rights grievance procedure includes:
    a. If voluntary informal mechanisms (e.g. mediation) for resolving some types of complaints if the parties agree to do so are included, is it clear that step can be skipped especially in the case of sexual violence. _____Yes _____No
    b. Notification to complainant of the right to end the informal process at any time. _____Yes _____No
    c. Application of the procedures to complaints alleging discrimination carried out by employees, other students, or third parties. _____Yes _____No
    d. Methods for notifying students, parents, and employees of the procedures, including where complaints may be filed. _____Yes _____No
    e. Adequate, reliable and impartial investigation of complaints, including the opportunity to present witnesses and present evidence. _____Yes _____No
    f. Designated and reasonably prompt time frames for the major stages of the complaint process. _____Yes _____No
    g. Methods for providing written notice to the parties of the complaint. _____Yes _____No
    h. An assurance the school will take steps to prevent the recurrence of any discrimination and to correct its discriminatory effects on the complainant and others, if appropriate. _____Yes _____No
    i. If a district has more than one grievance procedure, it must be clear which one to use and when (i.e. Civil Rights Grievance and Anti-Bullying and Harassment Complaint. _____Yes _____No

Source:
\ *Document Review Checklist I.D.1.*

12. The civil rights grievance procedure includes a provision for an impartial third party hearing for disability-based grievances when the internal findings on actions regarding the identification, evaluation, or educational placement of a student with a disability, who does not have an I.E.P. is believed to need adjustments to instruction or related services are appealed under Section 504. _____Yes _____No

Source:
\ *Document Review Checklist I.D.1.*

13. The grievance procedure is published in:
    a. Staff handbooks _____Yes _____No
    b. Student / parent handbooks _____Yes _____No
    c. The district website _____Yes _____No

Source:
\ *Document Review Checklist I.B.1.*

14. Grievance forms and instructions for filing grievances are available:
    a. At the central office _____Yes _____No
    b. At each attendance center _____Yes _____No
    c. On the district website _____Yes _____No

Source:
\ *Interviews*

15. Grievances have been filed in the past year on the basis of::
    a. Race _____Yes _____No
    b. Color _____Yes _____No
    c. National origin _____Yes _____No
    d. Sex _____Yes _____No
    e. Disability _____Yes _____No
    f. Religion _____Yes _____No
    g. Creed _____Yes _____No
    h. Age (required for employees only) _____Yes _____No
    i. Marital status (required for programs only) _____Yes _____No
    j. Sexual orientation _____Yes _____No
    k. Gender identity _____Yes _____No
    l. Socioeconomic status (required for programs only) _____Yes _____No

Source:
\ *Document Review Checklist, Equity Items for Review On-Site 1.*

Harassment and Bullying

Harassment and Bullying Issues

Federal civil rights laws prohibit harassment of students based on race, color, national origin and disability. Iowa state law 280.28 prohibits harassment or bullying on those same bases and adds additional protections based on actual or perceived age, creed, religion, marital status, sexual orientation, gender identity, physical attributes, ancestry, political party preference, political belief, socioeconomic status, or familial status.

The OCR Dear Colleague Letter of October 26, 2010 states that "Some forms of student misconduct that falls under a school's anti-bullying policy also may trigger responsibilities under one or more of the federal antidiscrimination laws."

A school that fails to respond appropriately to harassment on a prohibited basis may be violating one or more federal civil rights and/or laws. To determine the difference between harassment and bullying, the

district must understand that the specific label used (e.g., bullying, hazing, teasing) does not determine whether discriminatory conduct occurred. Rather, the nature of the conduct itself must be assessed for civil rights implications.

Examples of harassment include race and national origin harassment, sexual harassment, gender-based harassment, and disability harassment

Due to hate- and bias-related laws and crimes in Iowa, it is important that policies in student / staff handbooks, make it clear that harassment of students will not be tolerated. District staff may need training on how to deal with harassment and bullying; and parents, students, and staff will need direction and information on how to report incidents of harassment and bullying.

Comments:

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16. The school board has adopted a policy on harassment and bullying.
    _____Yes _____No Board Policy No. _____

a.	Race	_____Yes _____No
b.	Color	_____Yes _____No
c.	National origin	_____Yes _____No
d.	Sex	_____Yes _____No
e.	Age	_____Yes _____No
f.	Religion	_____Yes _____No
g.	Creed	_____Yes _____No
h.	Sexual orientation	_____Yes _____No
i.	Gender identity	_____Yes _____No
j.	Marital and parental status	_____Yes _____No
k.	Physical attributes	_____Yes _____No
l.	Physical or mental ability or disability	_____Yes _____No
m.	Ancestry	_____Yes _____No
n.	Political party preference	_____Yes _____No
o.	Political beliefs	_____Yes _____No
p.	Socioeconomic status	_____Yes _____No
q.	Familial status	_____Yes _____No

Source:

\ *Document Review Checklist I.D.2. and 2016-2017 Guidance for Nondiscrimination Notices*

17. The policy defines harassment and bullying. _____Yes _____No

Source:

\ *Document Review Checklist I.D.2.*

18. The policy covers each of the following:
    a. Students _____Yes _____No
    b. Employees (staff) _____Yes _____No
    c. Volunteers _____Yes _____No

Source:
\ *Document Review Checklist I.D.2.*

19. The policy includes "retaliation" and "false accusation" clauses. _____Yes _____No

Source:
\ Document Review Checklist I.D.2.

20. The policy describes the procedure for reporting an act of harassment or bullying. _____Yes _____No

Source:
\ *Document Review Checklist I.D.2.*

21. The policy identifies by job title, the school official responsible for ensuring that the policy is implemented. _____Yes _____No

Source:
\ *Document Review Checklist I.D.2.*

22. The policy describes the procedure for prompt investigation of complaints, either identifying the school superintendent or the superintendent's designee as the individual responsible for conducting the investigation. _____Yes _____No

Source:
\ *Document Review Checklist I.D.2.*

23. There is clear communication of the harassment, bullying, and hazing policy in:
    a. Student handbooks _____Yes _____No
    b. Staff handbooks _____Yes _____No
    c. Parent handbooks _____Yes _____No
    d. Coaches' handbooks _____Yes _____No
    e. District website (e.g., link on the home page) _____Yes _____No

Source:
\ *Document Review Checklist I.B.1.*

24. The district has developed and maintains a system to collect bullying and harassment incidence data. _____Yes _____No

Source:
\ *Document Review Checklist I.D.2.*

25. The district has submitted incidence data to the state data collection system over the past year. _____Yes _____No

Source:
\ *State Anti-Bullying Data Base*

26. The data submitted indicated _____number of incidents over the past year. Is this commensurate with the most recent Iowa Youth Survey data which reflected _____percent of students who answered the majority of questions in each construct with positive responses? _____Yes _____No

Source:
\ *State Anti-Bullying Data and Iowa Youth Survey data*

27. Staff has received training on how to prevent and to respond to harassment and bullying of staff and students. _____Yes _____No

Describe dates and type of training provided:

Source:
\ *Interview*

28. Administrative staff has received training on the district's grievance procedure and strategies for investigating complaints of harassment from staff and students. _____Yes _____No

Describe the training:

Source:
\ *Interview*

29. District personnel know the answers to the following questions:
    - Do grievance procedures apply to harassment?
    - Are the timeframes reasonably prompt and consistently followed?
    - Is it clear which procedures apply to discriminatory harassment?
    - Are the policies and procedures easy to find? How does the District publicize its policies prohibiting harassment?
    - Do equity coordinators and the school community understand what kind of conduct constitutes prohibited harassment?
    - What other personnel are involved when incidents of bullying or harassment occur and what are their responsibilities?
    - Do staff and students know how to report incidents? In cases of harassment, how does the school ensure targets of harassment are protected? What types of additional services are provided to targets of harassment?
    - What steps does the school take to stop further harassment and prevent any retaliation against the person who made the complaint or against those who provided information as witnesses?
    - Does the school have a means of recognizing possible patterns of discrimination and identifying any systemic problems in the school's response?
    - Is there a need for training or a school climate survey?

Source:

- *Interview*

Section II: Recruitment, Admissions and Counseling

The following sections address information to be disseminated to the appropriate counselors and teachers, actions they take to target information about their programs to students, and steps taken to recruit underrepresented students into their courses and programs. The equity coordinator(s) should be responsible to ensure that this process occurs and that staff is able to speak to the results.

Enrollment patterns are to be collected and reviewed on the basis of sex, race, national origin (including English Language Learners) and disability to monitor student integration and inclusion and to ensure that the district's educational programs are effectively serving all students.

Comments:

A. Admission Criteria

Applicable Requirements: Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Admissions Criteria Issues

Districts may not adopt or maintain a system 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. A Course Description Guide should contain general information including graduation requirements and an explanation of the grading system. The guide should include a description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.

30. The Course Description Guide contains accurate and up-to-date course descriptions. _____Yes _____No

Source:
\ *Document Review Checklist II.A.1.*

31. Course schedules are free of prerequisites that appear to unnecessarily serve as barriers to student enrollment. _____Yes _____No

Source:
\ *Document Review Checklist II.A.1.*

32. Course descriptions are free of discriminatory language based on race, color, national origin, sex or disability (i.e. I.E.P or general education). _____Yes _____No

Source:
\ *Document Review Checklist II.A.1.*

33. There is language in course and program descriptions that encourages the participation of students in career and technical courses and programs where their group has been under-represented.
    a. Sex _____Yes _____No
    b. Race _____Yes _____No
    c. National origin (English language learners) _____Yes _____No
    d. Persons with disabilities _____Yes _____No

Source:
\ *Document Review Checklist II.A.1.*

34. Course descriptions clearly include:
    a. Knowledge and skills to be learned _____Yes _____No
    b. How the knowledge and skills are related to potential careers or quality of life. _____Yes _____No

Source:

\ *Document Review Checklist II.A.1.*

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: Guidelines Section IV.L

35. Course descriptions are available to students and prospective students, including limited English-speaking students, prior to and during registration. _____Yes _____No

Source:
\ *Document Review Checklist II.B.1.*

36. Evidence indicated that CTE programs are open to English Language Learners and there are ELLs currently enrolled in CTE programs. _____Yes _____No

Source:
\ *Interviews and EdInsight Equity Data*

37. Evidence indicated the district provides support for ELL students enrolled in CTE courses to succeed in those courses, such as note-taking assistance, translation for technical terms, or designated office hours with the CTE instructors. _____Yes _____No

Source:
\ *Interviews*

C. Counseling and Prospects for Success

Applicable Requirements: Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36

School Counseling Issues:
Counseling brochures, materials, tests, and techniques are to be free of stereotyping in language, content, and illustration. Check to see if the counselor keeps any kind of records, which would allow them to identify students who are not using the counseling program. Do counselors have direct access to course and program enrollment disaggregated by sex, race, color, national origin or disability? Where sex, race, or disability segregation (over or under representation) is occurring, counseling materials and practices need to be reviewed to ensure that they are not contributing to this segregation. To keep abreast of this, it is necessary for counselors to review program enrollments, course enrollments, and involvement in extracurricular activities on a periodic basis.

38. Counselors have direct access to course and program enrollment data disaggregated on the basis of sex, disability, national origin, color, and race. _____Yes _____No

Source:
\ *Document Review Checklist II.C.1.*

39. School counselors are involved in the annual review of program and course enrollments to monitor the degree of integration and inclusion on the basis of:
    a. Race _____Yes _____No
    b. Sex _____Yes _____No
    c. Disability _____Yes _____No
    d. National origin (limited English proficiency) _____Yes _____No

Source:
\ *Interviews*

40. Where over or underrepresentation occurs in classes on the basis of race, color, national origin, sex, or disability, a review of counseling practices related to those classes has been implemented.

    Briefly describe this review:

Source:
\ *Interviews*

41. Where over or underrepresentation occurs in courses or programs on the basis of race, color, national origin, sex, or disability, describe the steps which have been taken by the counselor to target information at students from previously under-involved groups.

    Briefly describe these steps:

Source:
\ *Interviews*

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)

42. The district has the following procedures in place for providing counseling services for students who speak other languages or who are hard-of-hearing:

Source:

\ *Document Review Checklist II.D.I.*

E. Recruitment and Promotional Activities

Applicable Requirements: Guidelines Section V.A, V.C and V. E; 34 C.F.R. § 106.23

Recruitment and Promotional Activities Issues

This section is concerned with integration of students in buildings and instructional programs. Sex segregation, racial isolation, and disability isolation do not constitute a violation of law in and of themselves. When these conditions exist, the district is required to do a review of its policies and practices to ensure that they are not contributing to the isolation or to the segregation. In addition, steps must be taken by counselors and teachers to recruit students into the course, the program, or the activity.

This section will assist the team in assessing the level of integration and inclusion in the district's schools and programs and whether the district has met its obligation to review program enrollment policies and practices when segregation or isolation exists. It will be necessary to examine registration handbooks, course descriptions, program brochures, course announcements, and targeted audiences. Activities by instructors or counselors to ensure that students make informed choices about programs should be reviewed. Language, illustrations, content, and course titles which imply course or programs are not for everyone, or which are not inclusive of all groups, are to be viewed with skepticism. Encouragement to enroll should be targeted to students who have traditionally been underrepresented in the programs.

Class schedules should be reviewed to see if they limit access of certain groups of students (e.g., minority, English language learners, special education, males or females) to various career and technical programs or other course offerings. Course objectives should reflect multicultural and gender-fair instructional approaches.

Where enrollment criteria have a disparate impact on one sex, a racial group, or persons with disabilities, it is important that the district be able to show these criteria are directly related to success in the program. In reviewing this issue, look at prerequisites for getting into a program, both academic and experiential, as well as any numerical quotas or goals other than those established for affirmative action purposes.

All programs and classes must be open to all students regardless of sex, race, national origin, or disability. Practices that result in the grouping of students by race, national origin, sex, or disability within classes are also illegal. For the purposes of the educational equity review, segregated is defined as the following:

Sex: More than eighty percent (80%) of the enrollment in a class, program, or activity is either male or female.

Race: The percentage of minority students in a class, program, or activity is more than ten percentage points (10%) greater or less than the percentage of minority students in the school or the district.

English language learner: The percentage of English language learners in a class, program, or activity is more than ten percentage points (10%) greater or less than the percentage of English language learners in the school or the district.

Disability: The percentage of students with a disability in a class, program, or activity is more than ten percentage points (10%) greater or less than the percentage of students with a disability in the school or the district.

If a group of students is involved predominantly in one or two career and technical education programs when there are four or five offered, it would be appropriate to check if any tracking of students is occurring. Students with disabilities are to be served in the least restrictive way possible. Program modifications are to be made to allow involvement of limited English proficiency students as well.

If programs and policies have been reviewed, there should be evidence that teachers, counselors, and administrators are aware of the enrollment trends. There should also be evidence that staff members are taking on-going steps to recruit students who have not been involved.

Comments:

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43. There is a process in place to annually review and to analyze enrollment data on the basis of race, national origin, sex, and disability to monitor the integration of students in:
    a. Buildings _____Yes _____No
    b. Programs _____Yes _____No
    c. Courses _____Yes _____No

Source:

\ *Document Review Checklist II.E.1. and Interviews*

44. The district annually collects and analyzes disaggregated, attendance center, program, and course enrollment data on the basis of:
    a. Sex _____Yes _____No
    b. Disability _____Yes _____No
    c. Race _____Yes _____No
    d. National Origin _____Yes _____No

    List the name and position of person(s) responsible for coordinating and documenting this process:

Source:
\ *Document Review Checklist II.E.1. and Interviews*

45. The above data were available at the time of the educational equity review. _____Yes _____No

Source:
\ *EdInsight Equity Report and Student Information Management System*

46. This information has been disseminated to counselors and to the appropriate teachers. _____Yes _____No

Source:
\ *Interviews*

47. Counselors and appropriate teachers have documented steps they are currently taking to target information about programs or courses to groups of students underrepresented in programs or courses and to recruit them into the programs or courses. _____Yes _____No

    Describe steps taken:

Source:
\ *Interviews*

48. Steps are taken to ensure that information about all district programs and courses is provided to students and to parents in the primary language of the home. _____Yes _____No

If yes, briefly describe how this is done:

Source:
\ *Interviews*

49. The district identified the following CTE programs or courses as being either segregated or over- / underrepresented (by definition) on the basis of sex, race, national origin, and/or disability. Refer to the "Issues" at the beginning of this section. (List only those courses with segregated and/or over- / underrepresented enrollments).

Source:
\ *Interviews*

50. CTE course scheduling structures provide equitable access to all educational programs and courses to:
    a. Males and females _____Yes _____No
    b. Diverse racial groups _____Yes _____No
    c. Persons with disabilities _____Yes _____No
    d. English language learners _____Yes _____No

Source:
\ *Interviews*

51. There is a board policy governing student pregnancy and parental status.

    _____Yes _____No Board Policy Number _____

Source:
\ *Document Review Checklist II.E.2.*

52. The board's pregnancy and child-care policy clearly communicates student options and is designed to assist students complete their education and become productive citizens. _____Yes _____No

Source:
\ *Document Review Checklist II.E.2.*

53. Pregnant or married students have access to all:
    a. Courses and academic programs _____Yes _____No

Section III: Accessibility

The following sections deal with access and integration issues. Federal and state legislation speak to the need of physical access to a quality education for all children. Topics within this section deal with specific student populations that have historically been denied equal access, thus resulting in inequitable opportunities to be successful.

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

Accessibility of Physical Facilities and Education Programs Issues:

Districts have a responsibility to ensure equitable access to instructional facilities for all students. In the case of students with a physical disability or mobility impairment, facilities must be such that the student can enter a building or room without assistance from others. Buildings and areas are to be accessible even though there may not be any students or employees with disabilities at the present time.

Since all programs and services are to be accessible, the district must think about activities held in the building where patrons (e.g., parents and community persons) and employees with mobility impairments would be denied access because of architectural barriers. All districts have students who are temporarily disabled from time to time, and persons with mobility impairments (i.e., parents, grandparents) may avoid district programs or services if they are inaccessible.

Section 504 requires program accessibility for all buildings. However, any building built after 1977 or renovated after that date must meet the required standards of accessibility. The standards that determine accessibility will vary depending on the date of the facility's construction and/or renovation as shown in the table below. It is important for a district to understand its responsibility to ensure that architects and contractors are aware of the need to remove architectural barriers to provide access to all stakeholders.

Summary of Accessibility Compliance Standards by Date

If facilities (or parts of facilities) commenced construction / alteration before June 4, 1977, programs must be readily accessible according to Section 504.

If facilities (or parts of facilities) commenced construction / alteration between June 4, 1977 and January 17, 1991, they must be compliant with ANSI standards, A117.1 – 1961 (R 1971).

If facilities (or parts of facilities) commenced construction / alteration between January 18, 1991 and January 26, 1992, the facility must comply with UFAS standards. If facilities (or parts of facilities) commenced construction / alteration on or after January 27, 1992, the facility must comply with either UFAS or 1991 AAG standards (sub-recipient must choose one set of standards for each facility)

If construction or alteration of a facility (or part of a facility) began between **September 15, 2010 and March 14, 2012**, under the Title II regulation, the facility must comply with the **UFAS standards, the 1991 ADA standards, or the 2010 standards** (but the sub-recipient must choose one set of standards for the whole facility).

If construction or alteration of a facility (or part of a facility) began on or after **March 15, 2012**, under the Title II regulation, the facility must comply with the **2010 ADA standards**.

UFAS and ADAAG standards are available on-line at: http://www.access-board.gov.

Comments:

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54. The district has completed periodic self-evaluations of the accessibility of its programs and facilities to students, to staff, to parents, and to community members with disabilities. _____Yes _____No

    Date of the most recent review: _____

    If yes, the results of that self-evaluation are available for review. _____Yes _____No

Source:
\ *Document Review Checklist III.2.*

55. There is a written plan, which describes how the programs and services in those buildings or areas of buildings that still remain inaccessible are made available to students, to staff, to parents and to community members with disabilities. _____Yes _____No

Source:
Document Review Checklist III.2.

56. A review of district facilities indicates the district is not in violation of applicable accessibility standards. _____Yes _____No

Source:
\ *Accessibility Tour*

Section IV: Comparable Facilities

This section addresses the requirement that school districts must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex. Such facilities must be adapted or modified to the extent necessary to make the career and technical education program readily accessible to persons with disabilities.

A. Comparable Facilities

Applicable Requirements: Guidelines Section VI.D; 34 C.F.R. §106.33

Comparable Facilities Issues:

If the district does not provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex or if such facilities have not been adapted or modified to the extent necessary to make the career and technical education program readily accessible to persons with disabilities, the district must provide a plan to address how they will bring the facilities into compliance.

Comments:

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57. Locker rooms, changing rooms and shower facilities are equitable for both men and women. _____Yes _____No

Source:
\ *Accessibility Tour*

58. Locker rooms, changing rooms and shower facilities are located where all students have equal access to them or are duplicated in both the girls' and the boys' locker rooms. _____Yes _____No

Source:
\ *Accessibility Tour*

Section V: Services for Students with Disabilities

A. Services for Students with Disabilities

Applicable Requirements: Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Services for Students with Disabilities Issues:

Both state and federal law require that certain processes be put into place in regard to students with disabilities. An IEP is to be on file for each eligible student. Due process procedures are to be followed in the identification and placement of students. Services to students with disabilities are to be provided in the least restrictive environment that will meet their individual needs. All students, regardless of disability, must have equal opportunity to benefit from all school programs whether they are academic or co-curricular. It is important that the team explore the ways that the district serves their students with disabilities to ensure that appropriate placement is made based upon student need and not upon the services that the district has in place.

Student file review and parent, student and teacher interviews must indicate that Section 504 accommodations are provided to students district-wide. Evidence should be provided to demonstrate consistent implementation, review and evaluation within the program, and up-to-date records in student cumulative folders. The district Section 504 Coordinator, in conjunction with district administration, must review the current Section 504 protocols and expectations to ensure students are receiving Section 504 services as required. Provision of related aids and services must be based upon adherence to procedures that satisfy the requirements of the educational setting, evaluation and placement and procedural safeguards as required by Section 504. The review should include:

- Student qualification protocol
- What appropriate accommodations look like
- How accommodation information is disseminated to teaching staff
- How teacher accommodation responsibilities are monitored
- The frequency of accommodation reviews

Inconsistency with evaluation and protocol that might lead to denial of a Free and Appropriate Public Education (FAPE) for students with disabilities is a violation of Section 504.

Comments:

Services for Students with Disabilities

59. Board policies governing the Section 504 services students are entitled to receive:
    Board Policy No. _____

Source:
\ *Document Review Checklist V.1.*

60. Special education staff/administrator(s) review CTE course enrollment data to monitor whether district students with disabilities are over or underrepresented. _____Yes _____No

Source:
\ *Interviews*

61. Actions have been taken by the school district to reinforce collaboration between special education staff and the CTE education staff. _____Yes _____No

    Evidence of this collaboration was visible in the following ways:

Source:
\ *Interviews*

62. Course descriptions are available to students and prospective students, including students with disabilities, prior to and during registration. _____Yes _____No

Source:
\ *Interviews*

63. Evidence indicated that CTE programs are open to students with disabilities and students with disabilities are currently enrolled in CTE programs. _____Yes _____No

Source:
\ *Interviews*

64. Students are being served in the least restrictive environment appropriate with opportunities to interact with their nondisabled peers. _____Yes _____No

Source:
EdInsight Equity Report and Student Information Management System

65. Date of the most recent district update of Section 504 procedures.
    Date: _____

Source:
\ *Document Review Checklist V.1.*

66. A review of a random selection of Section 504 plans in place for students indicated that the plans contain appropriate provision of related aids and services based upon adherence to procedures that satisfy the requirements of the educational setting, evaluation and placement and procedural safeguards. _____Yes _____No

Comments

Source:
\ *Document Review Checklist, Equity Items for Review On-Site 2.*

67. Interviews with parents, students and teachers indicated plans are implemented consistently and students appear to be receiving Section 504 services as required. _____Yes _____No

If not, examples included:

Source:
\ *Interviews*

68. There is evidence of communication between the Equity Coordinator, the Section 504 Plan Coordinator, and the special education staff. _____Yes _____No

Source:
\ *Interviews*

Section VI: Financial Assistance

This section will look at whether the district administers financial assistance to students, and if so, how.

A. Financial Assistance

Applicable Requirements: Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37

Financial Assistance Issues:

School districts 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 over-all 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.

69. the district award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to career and technical education students on the basis of race, color, national origin, sex or disability except to overcome the effects of past discrimination? _____Yes _____No

Source:
\ *Document Review Checklist VI.1.*

70. If yes, are materials and information used to notify students of opportunities for financial assistance free of language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis? _____Yes _____No

Source:
\ *Interviews*

71. If the district's service area contains a community of national origin minority persons with limited English language skills, is financial assistance information disseminated to that community in its language? _____Yes _____No

Source:
\ *Interviews*

Section VII: Work Study, Cooperative Programs, and Job Placement

This section addresses the requirement that school districts insure that (a) it does not discriminate against its students on the basis of race, color, national origin, sex, or disability in making available opportunities in cooperative education, work study, and job placement programs and (b) students participating in such programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex or disability in recruitment, hiring, placement, assignment to work talks, hours of employments, levels of responsibility and in pay.

A. Work Study, Cooperative Programs, and Job Placement

Applicable Requirements: Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)

Workplace Learning Programs Issues:

A district not only has the responsibility to provide its services in a non-discriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Assignments cannot be made or withheld in such programs simply because of the race, color, national origin, sex or disability of the student. It is also illegal to cooperate with a business or agency that requests students on the basis of race or sex or national origin. When a district has agreements, the cooperative agency must indicate that it will not discriminate and that it understands that the district will not work with any business or industry that does.

Comments:

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72. The district provides the following workplace-based learning programs:

Source:
\ *Document Review Checklist VII.1.*

73. There is a written agreement between the school and the training station covering the details of the educational component that occurs in the job setting. _____Yes _____No

Source:
\ *Document Review Checklist VII.1.*

74. This written agreement includes an assurance of nondiscrimination that is aligned with the district's nondiscrimination policy and is signed by a workplace representative, the student, and the district representative. _____Yes _____No

Source:
\ *Document Review Checklist VII.1.*

75. The students enrolled in workplace learning programs reflect the demographics of the school district in terms of:
    a. Sex _____Yes _____No
    b. Race and national origin _____Yes _____No
    c. Disability _____Yes _____No

Source:
\ *Equity Data Table*

76. A review of job assignments indicates that males and females are placed in jobs that are both traditional and non-traditional for their sex. _____Yes _____No

Source:
\ *Interviews*

77. Interviews with students indicated there was no evidence that students have been limited from internship or employment opportunities on the basis of their race, color, national origin, sex, or disability. _____Yes _____No

Source:
\ *Interviews*

Section VIII: Employment

This section involves the employment side of Title IX, the Civil Rights Act and the Guidelines of 1979 for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Disability.

A. Employment

Employment and personnel policies, practices, and materials are to be free of stereotyping and bias on the basis of race, color, national origin, sex, disability, age, religion, creed, sexual orientation, and gender identity. Race, color, national origin, sex, disability and age are not to be factors in employment decisions unless they are used for affirmative action purposes. Employment forms are not to ask questions about race, color, national origin, sex, disability, age, religion, creed, sexual orientation, and gender identity.

Teaching or staff assignments are not to be made on the basis of sex, race, color, national origin, or disability. Recruitment efforts and strategies should not block access to jobs for any group.

Notification of the district's policy on nondiscrimination is to be given to all potential employees.

Districts 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 disability.

Comments:

78. Employment application forms include a statement of nondiscrimination, which includes notice about the grievance procedure and the identity of the equity coordinator. _____Yes _____No

Source:
\ *Document Review Checklist VIII.1.*

79. Employment application forms are free of illegal inquiries related to race, national origin, age, sex, religion, disability, and marital status. _____Yes _____No

Source:

\ *Document Review Checklist VIII.1.*

80. Notice of job openings used by the district in the past three years contain the district's nondiscrimination notification. _____Yes _____No

Source:
\ *Document Review Checklist VIII.1.*

81. A structured process exists that sets guidelines for selecting and interviewing applicants for employment. _____Yes _____No

Source:

\ *Interviews*

82. There is a document that describes the recruitment, hiring and assignment process in writing to help ensure consistency and fairness. _____Yes _____No

Source:
\ *Document Review Checklist VIII.1.*

83. Visible efforts are taken to avoid illegal inquiries in the interview process. _____Yes _____No

Source:
\ *Interviews*

84. Faculty salary scales and policy are based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex or disability. _____Yes _____No

Source:

\ *Document Review Checklist VIII.2.*