



Oregon Department of Education | Office of Learning
On-site Civil Rights Review

Secondary Self-Assessment Checklist

The Office of Learning actively supports the mission of the Office for Civil Rights: *“To ensure equal access to a high quality education for all students through the vigorous enforcement of civil rights”*. As a means to prevent discrimination and ensure equal access for each Oregon student, the Office of Learning is charged with the responsibility to review career & technical education programs for compliance with federal nondiscrimination regulations. Technical assistance to help institutions achieve voluntary compliance with the civil rights laws that the Office for Civil Rights enforces is available.

Federal Compliance Requirements

U.S. Department of Education regulations implementing:

- Title VI of the Civil Rights Act of 1964 (Title VI), 34 CFR Part 100
- Title IX of the Education Amendments of 1972 (Title IX), 34 CFR Part 106
- Section 504 of the Rehabilitation Act of 1973 (Section 504), 34 CFR Part 104
- Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, and National Origin, Sex and Handicap (Guidelines), 34 CFR Part 100 Appendix B

U.S. Department of Justice regulations implementing:

- Title II of the Americans with Disabilities Act of 1990 (Title II), 28 CFR Part 35 and subsequent Amendments

Oregon Revised Statutes (ORS)

- Harassment, Intimidation or Bullying and Prohibiting Cyberbullying,
ORS 339.351, 339.356, 339.359

For information regarding Perkins Career & Technical Education civil rights visitation, contact:

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**Civil Rights On-Site Review
Self-Assessment for Secondary Educational Institutions**

1. Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
Civil Rights Assurance		
<p>The district has a statement of assurance (signed by the college CEO and/or Board Chair) for Title VI, Title IX and Section 504. <u>Title VI of the Civil Rights Acts of 1964 [34 C.F.R., 100.4(a) thru (d)].</u> <u>Title IX of the Education Amendments of 1972 [34 C.F.R., 106.4] and</u> <u>Section 504 of the Rehabilitation Act of 1973 [34 C.F.R. 104.5]</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>A signed copy of assurance for Title VI of the Civil Rights Acts of 1964 [34 C.F.R., 100.4(a) thru (d)], Title IX of the Education Amendments of 1972 [34 C.F.R., 106.4] and Section 504 of the Rehabilitation Act of 1973 [34 C.F.R. 104.5] is on file in the institution.</p>	<ul style="list-style-type: none"> ▪ A copy of the signed Title VI, Title IX, Section 504 or a combined assurance document. ▪ A copy of College Board minutes authorizing the assurance. ▪ A copy of the application for federal Carl D. Perkins Career & Technical Education funds. Signatures on application signify compliance.
Annual Public Notification		
<p>Prior to the beginning of each school year, the district must advise students, parents, employees and general public that all career & technical education opportunities will be offered regardless of race, color, national origin, sex or disability.</p> <p>The notice must include a brief summary of program offerings and admission criteria and the name, office address, and phone number of persons designated to coordinate compliance under Title IX & Section 504.</p> <p>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 take steps to assure that the lack of English language skills will not be a barrier to admission and participation in Career & Technical Education programs. <u>Guidelines IV-O</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district issues annual public notice of nondiscrimination.</p> <p>The notice also is disseminated in the language of any national origin minority community in the service area.</p> <p>Annual notice lists coordinators of Section 504/ADA and Title IX with their name/title, address, and phone number.</p>	<ul style="list-style-type: none"> ▪ A notice in the local newspaper, district newspaper or other publication. ▪ A copy of the notice describing program offerings and admission criteria. ▪ A description of how the notice reaches: students, employees & applicants. ▪ A description of the method used to make this notice available to the visually impaired. ▪ If there are national origin minority students with limited English skills in the community, a description of the method used to make this notice available to students and community members

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1. Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
Continuous Nondiscrimination Notice		
<p>The district must take continuing steps to notify participants, beneficiaries, applicants, elementary and secondary school parents, 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.</p> <p><u>Title IX: 34 CFR 106.9</u> <u>Section 504: 34 CFR 104.8</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>A variety of district publications notify applicants, students, employees and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> ▪ Brochures on programs, activities ▪ Student application ▪ Job application ▪ Catalog ▪ Student handbook ▪ Job announcements ▪ Posters advertising various programs ▪ Recruitment materials ▪ Website ▪ School newspaper
Persons Responsible For Coordinating Title II, Title IX and Section 504		
<p>Each district 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.</p> <p>The recipient must notify students and employees of the name, office address, and phone number of the designated employee(s).</p> <p><u>Title II: 28 CFR 35.107 (a)</u> <u>Title IX: 34 CFR 106.8</u> <u>Section 504: 34 CFR 104.7(a)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district has assigned a person(s) to coordinate Section 504, Title II, and Title IX activities. This (these) person(s) must be aware of their duties and responsibilities and have the training necessary to carry out their responsibilities.</p> <p>The district lists coordinators of Section 504, Title II, and Title IX with their name/title, address, and phone number in the notice of nondiscrimination.</p>	<ul style="list-style-type: none"> ▪ Copies of information identifying the Title II, Title IX & Section 504 Coordinators: ▪ Catalogs ▪ Handbooks ▪ Job descriptions ▪ Website ▪ Interviews with Section 504, Title II, and Title IX coordinators ▪ Interviews with students, particularly nontraditional and students with disabilities ▪ Interviews with some faculty and administrators
Notice of Contact for Special Needs		
<p>The district has and uses an approved statement notifying the public who they should contact for special accommodations, by title, phone and address.</p> <p><u>Title II/ADA Federal Code, Subpart E, Communications, 35.160 General (b) (1) (a)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district provides a public notice to interested parties regarding the existence and location of services, activities and location of facilities that are accessible to and usable by individuals with disabilities</p>	<ul style="list-style-type: none"> ▪ Public notification statement of who to contact for special needs, by name/title, address/phone number and advance notice deadline. ▪ Copy of an event notice with the special needs statement.

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1. Administrative		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
Grievance Procedure		
<p>The district 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. <u>Section 504: 34 CFR 104.7(b)</u> <u>Title IX: 34 CFR 106.8(b)</u> <u>Title II: 28 CFR 35.107(b)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district notifies students and employees that there is a grievance procedure for persons who feel they have been discriminated against based on sex or disability.</p> <p>The procedure is readily available to students and employees and it is prompt and equitable.</p>	<ul style="list-style-type: none"> ▪ A copy of the grievance procedure ▪ Board minutes adopting the procedure ▪ Student handbooks ▪ Employee handbooks ▪ Catalogs ▪ Data on complaints ▪ Interviews with faculty, students and administrators ▪ Interviews with Section 504/ADA and Title IX coordinators
Harassment, Intimidation or Bullying and Prohibiting Cyberbullying		
<p>Each school district shall adopt a policy prohibiting harassment, intimidation or bullying and prohibiting cyberbullying. School districts are encouraged to develop the policy after consultation with parents and guardians, school employees, volunteers, students, administrators and community representatives. <u>ORS 339.351, 339.356, 339.359</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district has adopted a dissemination plan for its harassment, intimidation, bullying & cyberbullying policy.</p> <p>The grievance policies and procedures of the district include provisions for harassment, intimidation, bullying & cyberbullying.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Copy of policy <input type="checkbox"/> Copy of complaint form <input type="checkbox"/> Copy of staff and student handbooks <input type="checkbox"/> Copy of dissemination plan <input type="checkbox"/> Website
Distribution of Funds - OREGON		
<p>The district may not adopt a formula or other method for the allocation of Federal, State, or local career and technical education funds that has the effect of discriminating on the basis of race, color, national origin, sex or disability. <u>Guidelines III, A-F,</u> <u>The Carl D. Perkins Career and Technical Education Act of 2006, Public Law 105-332</u> <u>Title I—Voc & Tech Ed. Assistance to the States</u> <u>Part B—State Provisions</u> <u>Section 122 (c) (10)</u> <u>Title III—General Provisions, Part A—Federal Administrative Provisions</u> <u>Section 316—Fed. Laws Guaranteeing Civil Rights.</u></p> <p><u>Oregon State Plan for Vocational and Technical Education, February 2008</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>A description of how the district distributes federal career & technical education funds.</p> <p>Description of any formulas/criteria and/or factors used in the fund distribution.</p> <p>Description of how use of these formulas/criteria and/or factors for fund distribution result in a process that is nondiscriminatory.</p>	<ul style="list-style-type: none"> ▪ Local Perkins plan ▪ Criteria for local uses of Perkins career & technical education plan that ensures nondiscrimination ▪ Perkins Annual Report

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2. Admission		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Student Eligibility		
<p>The district 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.</p> <p>Guidelines IV-A</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Student eligibility criteria for admission to career & technical education facilities or programs do not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> ▪ Eligibility and admission criteria for career and technical education facilities or campuses. ▪ Eligibility and admissions policy and criteria for professional technical programs ▪ Descriptions of the admissions process ▪ Copy of career and technical education schedule of courses ▪ CTE Student Data Application
Admission Issues		
<p>The district 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.</p> <p>Guidelines IV-K</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Demographics of career-technical enrollment are similar to demographics of eligible pool or recipient provides a legitimate non-discriminatory rationale.</p> <p>Demographics of specific CTE programs are similar to demographics of entire career-technical enrollment or recipient provides a legitimate nondiscriminatory rationale.</p> <p>Admissions procedure, policy, and/or practice for career and technical education program enrollment avoid criteria that disproportionately exclude persons of a particular race, color, national origin, sex, or disability status.</p> <p>Admissions criteria that disproportionately exclude have been validated as essential to participation.</p>	<ul style="list-style-type: none"> ▪ Admissions policy for career and technical education programs. Description of the admissions process ▪ Procedures and criteria for selective admissions for career and technical education programs (where there are more applicants than can be accommodated). ▪ Demographics of rejected applicants by selections criteria ▪ Demographics of selected applicants by selection criteria ▪ Copy of CTE schedule of classes ▪ CTE Student Data Application

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2. Admission		
Equity Requirement/ Legal Citation	Indicators of Compliance	Suggested Documentation
Preadmission Inquiries		
<p>The district must avoid preadmission inquiries about marital, parental, or disability status. <u>Title IX: 34 CFR 106.21(c)</u> <u>Section 504: 34 CFR 104.42 (b)(4)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Application forms and materials do not request information about marital, parental, or disability status.</p>	<ul style="list-style-type: none"> ▪ Admissions application form and materials
Unlimited Occupational Opportunities for Disabled Persons		
<p>The district must not deny access to CTE 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 than for non-disabled persons. <u>Section 504: 34 CFR 104.10</u> <u>Section 504: 34 CFR 104.43(c)</u> <u>Guidelines IV-N</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district does not discourage students with disabilities from participating in programs due to potential workplace discrimination.</p>	<ul style="list-style-type: none"> ▪ Documentation of counseling ▪ Counseling materials ▪ Enrollment data ▪ Number of students with disabilities by program ▪ Placement/follow-up data ▪ Interviews
Limited English Skills		
<p>The district may not restrict admission to career & technical education 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. <u>Guidelines IV-L</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district has a procedure in place to identify and assess applicants with limited English proficiency.</p> <ul style="list-style-type: none"> – LEP enrollment in career & technical education is proportional to LEP enrollment in the service area – LEP enrollment in specific CTE programs is proportional to LEP enrollment in career & technical education overall. 	<ul style="list-style-type: none"> ▪ Procedure for LEP identification and placement ▪ Summary of steps taken to increase LEP participation in programs where they traditionally have been underrepresented ▪ Specific program enrollment demographics by LEP status

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3. Recruitment		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Non-exclusive Recruitment		
Districts must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or disability. <u>Title IX: 34 CFR 106.23 (a)(b)</u> <u>Guidelines V-C</u> Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation	All potential students have access to information. Efforts are made to reach underrepresented groups.	<ul style="list-style-type: none"> ▪ Recruitment plans ▪ List of recruitment activities and sites ▪ Description of recruitment activities ▪ Schedule of recruitment activities ▪ Selection & admissions criteria for career & technical education programs/courses
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. <u>Guidelines V-C</u> Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation	Descriptions of career opportunities are bias-free and free from stereotyping.	<ul style="list-style-type: none"> ▪ Recruitment brochures and marketing materials-English & non-English versions ▪ Course syllabi or catalog ▪ Policies/procedures for CTE programs/courses that address needs of Limited English Proficiency students.
Recruiting Teams		
To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities. <u>Guidelines V-C</u> Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation	Where possible, persons of differing races, genders, and disability are used for recruiting purposes. <i>(But a failure to do so should not be construed as noncompliance.)</i>	<ul style="list-style-type: none"> ▪ Staff demographics by program ▪ Recruitment team demographics by program
A Community with Persons of limited English Proficiency		
If a district's service area contains a community with persons of limited English proficiency, information must be available to that community in its language. <u>Guidelines V-E</u> Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation	Process is in place to identify and communicate with language minority communities. Efforts are made to communicate in a commonly understood language.	<ul style="list-style-type: none"> ▪ Verification of limited English proficient community ▪ Samples of materials in other languages

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3. Recruitment		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Promotional efforts and Materials		
<p>Districts 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.</p> <p><i>Guidelines V-E</i></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Materials and/or media presentations show persons of varying races, male and female, persons with disabilities, and different national origins.</p>	<ul style="list-style-type: none"> ▪ Promotional materials, including: <ul style="list-style-type: none"> -- brochures, -- flyers, -- newspaper advertising, -- catalogs

4. Site Location		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Site Selection		
<p>The district 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. District's must locate career & technical education facilities at sites that are readily accessible to both minority and non-minority communities and that do not tend to identify the facility or program as intended for minority or non-minority students.</p> <p><i>Guidelines IV-B</i></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Sites of professional technical programs are readily accessible to minority and non-minority communities and their location does not result in segregation.</p> <p><i>Guidelines IV-B</i></p>	<ul style="list-style-type: none"> ▪ Maps showing location of career & technical education facilities ▪ Enrollment demographics of each facility ▪ Demographics of communities surrounding the district
Site Modifications		
<p>A district may not add to, modify, or renovate the physical plan of a career & technical education facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex, or disability.</p> <p><i>Guidelines IV-D</i></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>After modification, the CTE site is readily accessible to minority and non-minority communities and the modification does not result in segregation.</p>	<ul style="list-style-type: none"> ▪ Maps showing location of modified career & technical education program facilities ▪ Student demographics before and after facility modifications ▪ Demographics of communities surrounding the district.

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4. Site Location		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Residency		
<p>A district may not establish, approve, or maintain geographic boundaries that unlawfully exclude students on the basis of race, color, or national origin. Guidelines IV-C</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Attendance zones do not have the effect of excluding students on the basis of race, color, or national origin</p>	<ul style="list-style-type: none"> ▪ Maps of attendance zones ▪ Demographics of contiguous service areas to the district ▪ Curriculum offerings at contiguous facilities ▪ Job placement rates at contiguous facilities

5. Services for Students with Disabilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
No Exclusion Based on Disability		
<p>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. <u>Section 504: 34 CFR 104.4(a)</u> <u>Title II: 28 CFR 35.130(a)</u> <u>Guidelines IV-N</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district implements policies and procedures ensuring access for students with disabilities to programs, services, and activities</p>	<ul style="list-style-type: none"> ▪ Board policy ▪ Student handbooks ▪ Membership in clubs & activities ▪ Procedures for selection into clubs, activities, programs ▪ Criteria for admission into courses, programs, services and activities ▪ Public notification that all services, activities, and facilities are accessible for individuals with disabilities.
<p>Students with disabilities must not be excluded from career & technical education or academic programs, courses, services, or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available. <u>Guidelines IV-N</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities.</p>	<ul style="list-style-type: none"> ▪ Examples of equipment adapted ▪ Description of policy for providing aids and services ▪ Description of aids and services available/provided/denied ▪ List of materials/resources available for students with sensory impairments ▪ Enrollment data by program ▪ Number of students with disabilities denied admission ▪ Student handbook, college catalog ▪ Policies governing use of guide dogs, tape recorders, note takers

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5. Services for Students with Disabilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Free Appropriate Public Education (FAPE)		
<p>A recipient that operates an elementary or secondary program or activity must provide a free, appropriate public education (FAPE) to each qualified disabled person in its jurisdiction. The recipient must have a system in place for the identification, evaluation and educational placement of these disabled persons. Placement decisions must be made by a group of persons, including persons knowledgeable about the child, the meaning of the evaluation, data, and the placement options. The recipient must provide procedural safeguards through which parents or guardians may obtain an impartial review of the evaluation and placement actions. <u>Section 504: 34 CFR 104.33, 35 and 36</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The FAPE policies and procedures provide for the identification, evaluation, and placement of students with disabilities and include procedural safeguards.</p> <p>Evaluations and placement records of individual students with disabilities indicate that placement decisions are fully documented and timely re-evaluations are conducted.</p> <p>Persons who are knowledgeable about placement options in career and technical education programs participate in CTE placement decisions</p> <p>The district implements policies and procedures ensuring access for students with disabilities to programs, services, and activities.</p>	<ul style="list-style-type: none"> ▪ FAPE policies and procedures ▪ A description or list of the materials and persons relied upon in the evaluation and placement process ▪ Description of the system of procedural safeguards ▪ List of persons with knowledge of career and technical education programs who participate in FAPE placement decisions for career and technical education programs ▪ Section 504 plans, placement records, IEPs, and similar records of students with disabilities place in a career and technical education program ▪ Board policy ▪ Student handbooks ▪ Membership in clubs & activities ▪ Procedures for selection into clubs, activities, programs ▪ Criteria for admission into courses, programs, services and activities ▪ Public notification that all services, activities, and facilities are accessible for individuals with disabilities.
Regular Educational Environment		
<p>Disabled secondary students must be placed in the regular educational environment of any career and technical education, academic, physical education, athletic or other school program or activity to the maximum extent appropriate to their needs with the use of supplementary aids and services. <u>Section 504: 34 CFR 104.34 9 (a) & (b)</u> <u>Title II: 28 CRF 35.130 (d)</u> <u>Guidelines VI-A</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district provides appropriate aids and services for students with disabilities and does not have policies that limit participation of students with disabilities.</p>	<ul style="list-style-type: none"> ▪ Examples of equipment adapted ▪ Description of policy for providing aids and services ▪ Description of aids and services available/provided/denied ▪ List of materials/resources available for students with sensory impairments ▪ Enrollment data by program ▪ Number of students with disabilities denied admission ▪ Student handbooks or calendars ▪ Policies governing use of guide dogs, tape recorders, note takers

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5. Services for Students with Disabilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Satisfaction of FAPE Requirements		
<p>Secondary students with disabilities are placed in a career and technical education program only when the 504 FAPE requirements for evaluation, placement, and procedural safeguards have been satisfied. <u>Section 504: 34 CFR 104.35 (a) Guidelines VI-A</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The FAPE policies and procedures provide for the identification, evaluation, and placement of students with disabilities and include procedural safeguards.</p> <p>Evaluations and placement records of individual students with disabilities indicate that placement decisions are fully documented and timely re-evaluations are conducted.</p> <p>Persons who are knowledgeable about placement options in career and technical education programs participate in CTE placement decisions</p>	<ul style="list-style-type: none"> ▪ FAPE policies and procedures ▪ A description or list of the materials and persons relied upon in the evaluation and placement process ▪ Description of the system of procedural safeguards ▪ List of persons with knowledge of career and technical education programs who participate in FAPE placement decisions for career and technical education programs ▪ Section 504 plans, placement records, IEPs, and similar records of students with disabilities placed in a career and technical education program

6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Section 504/ADA Accessibility Issues		
<p>The district may not exclude students with disabilities from enjoying the benefits of its program or service because its facilities are inaccessible to or unusable by persons with disabilities. <u>Existing facilities/Section 504 (34 CFR, 104.22)</u> <u>New construction/Section 504 (34 CFR 104.23)</u> <u>New construction/Section 504 (34 CFR 104.23)</u> <u>New construction/ ADA (28 CFR 35.151)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Applicable accessibility standards are determined by the date the facility was constructed or last renovated by the institution.</p>	<ul style="list-style-type: none"> ▪ List of each facility reviewed with the date of construction or last renovation and the career & technical education programs offered therein. <ul style="list-style-type: none"> --Building --Date --Programs ▪ Interviews with Agency CEO, Guidance Counselors, Department chairs, ADA and 504 Coordinators, Coordinator for Disabled Student Services, & Facilities Director.

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Existing (<i>Readily Accessible</i>) facility under Section 504 – Built or altered beginning June 3, 1977, or earlier		
<p>The district 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. <u>Section 504: 34 CFR 104.22</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>--Readily Accessible --Redesign of equipment --Reassignment of classes or other services to accessible buildings --Assignment of aides to beneficiaries (but no carrying) --Home visits --Alteration of existing facilities and construction of new facilities in conformance with the requirements for new construction or any other methods that result in making its program or activity accessible to persons with disabilities</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates
New construction under Section 504 – Built or altered between June 4, 1977, and January 17, 1991, inclusive		
<p>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 disabilities. 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. <u>Section 504: 34 CFR 104.23</u> (prior to January 18, 1991 amendment)</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>ANSI 4.1 Grading 4.2 Walks 4.3 Parking lots 5.1 Ramps and gradients 5.2 Entrances 5.3 Doors and doorways 5.4 Stairs 5.5 Floors 5.6 Toilet rooms 5.7 Water fountains 5.8 Public phones 5.9 Elevators 5.10 Controls 5.11 Identification 5.12 Warning signals 5.13 Hazards</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates
New construction under Section 504 – Built or altered between January 18, 1991, and January 26, 1992, inclusive:		
	<p><i>Uniform Federal Accessibility Standards (UFAS)</i> as applicable.</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
New construction under ADA Title II and Section 504 – Built after January 26, 1992; exercising the option to follow UFAS		
<p>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 subparts 101-19.6). Departures from particular technical and scoping requirements permitted where substantially equivalent or greater access to and usability of the building is provided. <u>Section 504: 34 CFR 104.23</u> <u>Title II: 28 CFR 35.151</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p><i>Uniform Federal Accessibility Standards (UFAS)</i> as applicable.</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates
New construction under ADA Title II – Built after January 26, 1992 and before September 15, 2010; exercising the option to follow 1991 ADA Standards		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a 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 1991 ADA Standards for Accessible Design (1991 ADA Standards) (Appendix A to 28 CFR Part 36). Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. Subrecipients may also exercise the option to follow UFAS.) <u>Title II: 28 CFR 35.151 (a), (b) & (c) (1)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p><i>1991 ADA Standards for Accessible Design (1991 ADA Standards)</i> as applicable.</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates

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6. Program Accessibility		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
<p><i>New construction under ADA Title II – Built on or after September 15, 2010, and before March 15, 2012; exercising the option to follow the 2010 ADA Standards for Accessible Design.</i></p>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity is designed and constructed in such a manner that the facility is readily accessible to and usable by persons with disabilities. Conformance with the 2010 ADA Standards for Accessible Design (2010 ADA Standards) Available at: http://www.ada.gov/regs2010/2010ADAStandards /2010ADAStandards.pdf. Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. (Subrecipients may also exercise the option to follow UFAS or the 1991 ADA Standards. The elevator exemption contained at 1991 ADA Standards 4.1.3(5) and 4.1.6(1) (k) shall not apply.) <u>Title II: 28 CFR 35.151(c)(2)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>2010 ADA Standards for Accessible Design (available at http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf) as applicable</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates
<p><i>New construction under ADA Title II – Built on or after March 15, 2012; follow 2010 ADA Standards for Accessible Design.</i></p>		
<p>Each facility or part of a facility constructed by, on behalf of, or for the use of a 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 disabilities. Conformance with the 2010 ADA Standards for Accessible Design (2010 ADA Standards) Available at: http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf. <u>Title II: 28 CFR 35.151 (c)(3)</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>2010 ADA Standards for Accessible Design (available at http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf)</p>	<ul style="list-style-type: none"> ▪ Observations and measurements ▪ Blueprints and plans ▪ Renovation schedules ▪ Maintenance records ▪ Work orders or contracts indicating construction start dates

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7. Comparable Facilities		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Separate Facilities		
<p>If separate programs or facilities exist for students with disabilities, they are comparable to those for students without disabilities. <u>Section 504: 34 CFR 104.34(c)</u> <u>Guidelines VI-A</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Facilities are comparable.</p> <p>Programs are comparable.</p> <p>Services are comparable.</p>	<ul style="list-style-type: none"> ▪ Review of facilities ▪ Comparison of programs and services offered to both students with disabilities and students without disabilities
Changing Rooms/Showers Comparable		
<p>Changing rooms, showers, and other facilities for students of one sex are comparable to those provided to students of the other sex.</p> <p>Changing rooms, showers, and other facilities for students with disabilities are comparable to those provided to students without disabilities. <u>Title IX: 34 CFR 106.33</u> <u>Section 504: 34 CFR 104.4(b)(ii)</u></p> <p><i>Guidelines VI-D</i></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Locker rooms have approximately the same space and amenities for both males and females.</p> <p>If there is disparity, the institution provides a legitimate, nondiscriminatory rationale.</p> <p>Changing rooms, shower, bathrooms, and other facilities near the professional technical areas are comparable for both men and women.</p> <p>Persons with disabilities have convenient access to changing facilities and shower facilities.</p>	<ul style="list-style-type: none"> ▪ Visual examination of the facilities ▪ Interviews students ▪ Interviews with staff

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8. Work Study, Cooperative Education and Job Placement		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Opportunities Available to All		
<p>Opportunities in career related learning experiences are available to all students regardless of race, color, national origin, sex, or disability. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.31(d)</u> <u>Section 504: 34 CFR 104.4(b)</u></p> <p>Guidelines VII-A</p> <p>Guidelines VII-A</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Students in the work-study, cooperative education and job placement programs are representative of the demographics of the school or program.</p> <p>If there is disparity, the institution provides a legitimate, nondiscriminatory rationale.</p>	<ul style="list-style-type: none"> ▪ Review of enrollment data in career related learning experiences, internships, and job placement programs ▪ Placement policies and criteria for placement ▪ Employment notices ▪ Interviews with students ▪ Interviews with staff ▪ Student employment notices
Assurance of Employer Nondiscrimination		
<p>A district that assists employers and prospective employers in making career related learning opportunities and job placements 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, and pay. <u>Title VI: 34 CFR 100.3(b)</u> <u>Title IX: 34 CFR 106.38</u> <u>Guidelines VII-A</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>If there are written workplace agreements, they contain an assurance of nondiscrimination that is signed by both the employer and the school.</p> <p>The district does not honor any employer's requests nor make referrals for the placement; career related learning experience or internship to any employer who indicates a preference for applicants based on race, color, national origin, gender or disability.</p>	<ul style="list-style-type: none"> ▪ Review of workplace assignments, hours of work, and job assignments ▪ Interviews with students ▪ Interviews with staff ▪ Copies of training agreements with employers that include statements of nondiscrimination and employer assurances ▪ Career related learning experience placement policies and criteria for placement ▪ Student employment notices

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9. Guidance and Counseling		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Counseling Materials and Activities Do Not Discriminate		
<p>Districts 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.</p> <p><i>Title IX: 34 CFR 106.36</i> <u>Section 504: 34 CFR 104.47 (b)</u></p> <p>Guidelines V-A</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The written guidance plan, policy, and procedures ensure nondiscrimination.</p> <p>The written assessment plan ensures nondiscrimination.</p>	<ul style="list-style-type: none"> ▪ A copy of the written district guidance and counseling policy, plan and procedure. ▪ A list of test administered for selecting students for placement in career & technical education programs/courses. ▪ Written procedures for evaluation and placement of students with disabilities ▪ List of tests and interest inventories administered. ▪ Promotional and recruitment materials
Career & Technical Education Programs Open to All Students		
<p>Counselors must not direct students into programs based on their race, color, national origin, sex, or disability. Districts 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.</p> <p><i>Title IX: 34 CFR 106.36</i> <u>Section 504: 34 CFR 104.47(b)</u></p> <p>Guidelines V-B</p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Career & technical education program enrollments by sex, race, national origin, and disability are proportionate to enrollment of these groups in the general student population.</p> <p>Where enrollments are not proportionate, the institution can furnish a legitimate, nondiscriminatory rationale.</p>	<ul style="list-style-type: none"> ▪ OCCURS data. (Enrollment demographics by class/program) ▪ Admission criteria ▪ Enrollment forms. ▪ Description of counseling services for students with limited English language skills and disabilities. ▪ Copies of promotional materials used with limited English language students
Nonrestrictive Career Objectives for Students with Disabilities		
<p>Districts may not counsel disabled students toward more restrictive career objectives than non-disabled students with similar abilities and interests.</p> <p><i>Section 504: 34 CFR 104.47(b)</i> <u>Guidelines V-B</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Students with disabilities have equal access to all programs and classes based on abilities and interests.</p>	<ul style="list-style-type: none"> ▪ Examples of pre-enrollment counseling ▪ Enrollment data

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9. Guidance and Counseling		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Counseling of Students with Limited English Proficiency or Hearing Impairments		
<p>Districts must ensure that counselors can effectively communicate with students with limited English proficiency and with students with sensory impairments. <u>Guidelines V-D</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The written guidance plan, policy, and procedures ensure nondiscrimination.</p> <p>The written assessment plan ensures nondiscrimination.</p>	<ul style="list-style-type: none"> ▪ Written plan for the provision of services for LEP individuals ▪ Written plan for provision of services for individuals with hearing impairments ▪ Samples of materials in other languages/formats
Disproportional Enrollment		
<p>If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Colleges must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities. <u>Title IX: 34 CFR 106.36</u> <u>Guidelines V-B</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Career and technical education program enrollments by sex, race, national origin, and disability are proportionate to enrollment of these groups in the general student population.</p> <p>Where enrollments are not proportionate, the institution can furnish a legitimate, nondiscriminatory rationale.</p> <p>Students with disabilities have equal access to all programs and classes based on abilities and interests.</p>	<ul style="list-style-type: none"> ▪ Description of any efforts made to correct disproportionate program enrollment by gender, minority or disabled status. ▪ Examples of pre-enrollment counseling ▪ Enrollment data ▪ Examples of revised counseling materials or activities in response to disproportionate enrollments

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10. Employment		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Pre-employment & Employment Practices		
<p>Districts may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or disability. Districts 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.</p> <p>Districts may not make pre-employment inquiries concerning disability, marital, or parental status. <u>Title IX: 34 CFR 106.60</u> <u>Section 504: 34 CFR 104.14</u> <u>Guidelines VIII-A</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district's employment practices are conducted without regard to race, color, national origin, sex, or disability of applicants or employees.</p> <p>Application forms and materials are free from prohibited questions concerning disability or marital or parental status.</p>	<ul style="list-style-type: none"> ▪ Copies of employment practices documents including: <ul style="list-style-type: none"> --hiring policies & procedures --advancement policies and procedures --employee handbooks --application materials and forms --screening committee policies and procedures --rating systems --job announcements --recruitment policies ▪ Copy of affirmative action or equal employment opportunity plan adopted by the board, if it exists, must be consistent with federal law.
Notice to Faculty of Nondiscrimination		
<p>The district must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability. <u>Guidelines VIII-B</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district notifies its sources of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> ▪ Copy of an employment application form ▪ Job/position descriptions. ▪ Copy of published job vacancy announcements and advertisements. ▪ Recruitment letters or contacts ▪ Personnel website and other related recruitment documents ▪ Published nondiscrimination statement in newspapers, student handbooks, & other college materials

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10. Employment		
Equity Requirement/ Legal Cites	Indicators of Compliance	Suggested Documentation
Faculty Salary Scales Do Not Discriminate		
<p>The district 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. <u>Title IX: 34 CFR 106.54</u> <u>Section 504: 34 CFR 104.11 and 12</u> <u>Guidelines VIII-D</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>Faculty salary scales and policy are based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.</p> <p>Faculty assignment patterns are non-discriminatory on the basis of race, color, national origin, sex, or disability.</p> <p>Non-faculty salary administration is based upon the conditions of employment without regard to race, color, national origin, sex, or disability.</p>	<ul style="list-style-type: none"> ▪ District salary schedule(s) ▪ Faculty assignment information by race/ethnic group, sex, and staff with disabilities ▪ Non-faculty classification/compensation system is in place that evaluates jobs and places them in appropriate salary ranges according to working conditions and levels of employment responsibility
Equal Employment Opportunities for Applicants with Disabilities		
<p>Districts 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. <u>Section 504: 34 CFR 104.12</u> <u>Guidelines VIII-E</u></p> <p style="text-align: center;">Investigation Does <input type="checkbox"/> Does Not <input type="checkbox"/> reveal evidence of a violation</p>	<p>The district's employment policies do not unlawfully discriminate against the disabled.</p> <p>Persons with disabilities are employed in teaching and administrative positions and are not treated differently in promotion and tenure decisions.</p>	<ul style="list-style-type: none"> ▪ Number of staff with disabilities ▪ Copies/descriptions of policies, procedures, and criteria considered for hiring, promotion, retention, and tenure including professional and non-professional applications