

Ohio Department of Education and Workforce, Office of Career-Technical Education

Methods of Administration Plan

IMPLEMENTATION SCHOOL YEAR 2024

Section 1: Introductory Information

The Ohio Department of Education and Workforce (DEW), as the official state educational agency, has the primary responsibility for the development, administration, and management of the Methods of Administration (MOA) plan. The development and implementation of the MOA plan, as required under Guidelines (44 Federal Register 17162, March 21, 1979) issued by the Office for Civil Rights (OCR) and the February 6, 2020, Memorandum of Procedures issued jointly by the OCR and the Office of Career, Technical, and Adult Education (OCTAE) will be implemented through DEW, Office of Career-Technical Education (CTE).

Section 2: Plan for Performing Oversight Responsibilities

Ohio's selection of sub-recipients for review is based on guidance provided by OCTAE and OCR. It is designed to ensure broader coverage of the identified pool of sub-recipients by using career-technical planning district (CTPD), community college, and Ohio Technical Centers (OTCs) enrollment data as compared to CTE participant enrollment of funded workforce development courses for gender, minority students and students with disabilities to identify the district or institutions with the most risk for potential discriminatory policies and noncompliance to civil rights laws.

CTPDs (which include secondary community schools and traditional schools), community colleges, OTCs, and state-run educational schools and districts provide career-technical education and receive federal financial assistance in Ohio. Ohio will focus on reviewing secondary schools in a CTPD, community colleges and OTCs. Ohio will identify each CTPD as a sub-recipient and all secondary building locations that house career-technical education and receive federal funding included in that district. The size of CTPDs vary between one and over 30 different building locations, therefore a maximum of three building locations in the CTPD will participate in the review process. Postsecondary community colleges and OTCs will be identified as individual sub-recipients for selection for review.

The design of Ohio’s review selection process is not tied directly to any other monitoring or accreditation cycle. If it is discovered that OCR on-site monitoring will coincide with another on-site monitoring process, the local administration may request special dispensation and the MOA coordinator will consider adjusting the visitation dates to accommodate the local calendar, to the extent possible. The period of adjustment, however, will be limited to the school year in which the sub-recipient is eligible and may not be moved to the next school year. Any exceptions will be made under the approval of the OCR.

PURPOSE OF THE REVIEW PROCESS

The purpose of reviewing institutions that offer career-technical education is to ensure that all students, regardless of race, color, national origin, sex or disability, have equal access and opportunities to succeed in career-technical programs.

Ohio’s approach to monitoring will include technical assistance, comprehensive reviews including desk reviews and virtual or on-site reviews for the sub-recipient universe of secondary CTPDs and postsecondary community colleges and OTCs. Technical assistance will be offered to all sub-recipients including secondary and postsecondary state-run educational districts. Comprehensive reviews including a desk review and virtual or on-site civil rights review will be required by selected sub-recipients based on the data analysis of race, sex, and disability.

STAFF RESOURCES

Staff Member and Title	FTE
Rebecca Crance, Assistant Administrator/MOA Coordinator	.50
Shell Nichols, Associate Director, Office of Career-Technical Education	.20
Total FTE	.70

SUBRECIPIENT UNIVERSE

The subrecipient universe will be divided into three distinct categories:

- Secondary will consist of CTPDs and a maximum of three building locations within the district;
- postsecondary consists of community colleges and OTCs; and,
- state-run educational schools and districts.

The sub-recipient’s universe, as of September 1, 2023, offering career-technical programs and receiving federal financial assistance is approximately 89 CTPDs; consisting of over 700 building locations, 76 postsecondary community colleges and OTCs, two state-run educational schools, and two state-run educational districts.

SELECTION CRITERIA AND PROCESS

In accordance with OCR, sub-recipients who receive federal financial aid and offer career-technical education programs must be evaluated by means of a review on a regular basis.

First, data from Ohio's Educational Management Information System (EMIS) and the Higher Education Information (HEI) system will be used from the previous school year to conduct the analysis for the selection process. Overall enrollment and overall enrollment of minorities, gender, and students with disabilities in CTPDs, secondary building locations, community colleges, and OTCs will be evaluated using a percent difference calculation and then compared to the CTE enrollment of minorities, gender, and students with disabilities in the same locations.

After November 1 of each year, data will be compiled for selection of two secondary CTPDs and a maximum of three building locations in each CTPD, and one postsecondary OTC or community college to receive a comprehensive desk review and virtual or on-site review. The number of secondary comprehensive reviews will be a maximum of six buildings each year. The number of comprehensive desk and virtual and on-site reviews for postsecondary will be one each year, with all building locations in the postsecondary location housing CTE programs included in the review. The total number of institutions receiving a review will be three to seven, depending upon the building locations housing CTE in secondary districts.

Any building location in the CTPD, community college or OTC that has received a review within the last five calendar years will be excluded from participating in a review.

SECONDARY SCHOOLS

All CTPDs are included in the sub-recipient pool each year. Using race, gender and disability data extracted from the Educational Management Information System (EMIS), CTPDs will be ranked and evaluated using the percent difference calculation comparing approved workforce development course enrollment to the overall CTPD enrollment. Of those, two CTPDs will be selected for review. Those CTPDs will have the building locations offering CTE in the district then ranked and evaluated using the percent difference calculation comparing approved workforce development course enrollment to the overall building enrollment. A maximum of the top three ranked buildings will be selected for a comprehensive review every year. These two to six secondary locations will be required to complete a comprehensive desk review and virtual or on-site review from the MOA coordinator and civil rights review team.

POSTSECONDARY SCHOOLS

The postsecondary community colleges and OTCs in Ohio providing career-technical education programs and receiving Federal funds will be eligible for selection of civil rights monitoring. If a selected community college or OTC operates at multiple building locations, all locations offering career-technical programming will be reviewed.

The selection process will identify one sub-recipient, based on the data reported in the HEI system using race, gender and disability CTE enrollment data as compared to the overall institution enrollment demographics of the sub-recipient, then ranked and evaluated using the percent difference calculation comparing approved CTE course enrollment to the overall school enrollment. The selected postsecondary sub-recipients will be asked to complete a comprehensive desk review and virtual or on-site review from the MOA coordinator and civil rights review team.

STATE-OPERATED PROGRAMS

Inmates in Ohio are served by one of two school districts assigned to the adult and juvenile correctional systems. For incarcerated adults, career-technical activities and courses are operated by the Ohio Central School System, a component of the Ohio Department of Rehabilitation and Corrections. Juveniles are served by the Buckeye United School System as part of the Ohio Department of Youth Services. Career-technical activities and courses are offered through the district at all locations. The Ohio Deaf and Blind Education Service are two state-run educational schools offering career-technical exploration and activities in the state of Ohio. These schools and districts report limited data to DEW, therefore, support through the MOA program will be offered in the form of technical assistance by the MOA coordinator.

RANKING PROCEDURES FOR DESK REVIEW

For determining the selection of sub-recipients for a comprehensive review, self-reported data collected from EMIS and HEI will be used to determine risk for potential discriminatory policies and noncompliance to civil rights laws. This will be determined by a system that ranks the difference in enrollment between the students in CTE funded workforce development programs as compared to the sub-recipient’s overall enrollment. The percentage difference between the two sets of data and the resulting difference will be assigned a numerical rank.

GENDER

The percentage of females enrolled in the overall CTPD will be compared to the percentage of females enrolled in funded workforce development career-technical programs in the district. A point value will be applied to the percent difference range. This same process will be used to determine the maximum of three building locations for each CTPD. For each building location offering funded workforce development career-technical courses, the percentage of females enrolled in these programs will be compared to the overall building enrollment, and the point value will be assigned. The percentage of females enrolled in a postsecondary sub-recipient will be compared to the percentage of females enrolled in the career-technical programs in the institution, and a point value will be assigned. The table below demonstrates the point value assignment.

Range of % Difference	Points
0 - 5	1
6 - 10	2
11 - 20	3
21 - 30	4
31 - 40	5
41 - 50	6
51 - 60	7
61 and above	8

Table 1: Percentage difference point value assignment for female enrollment for the Ohio MOA selection process.

MINORITY

The percentage of minority students enrolled in the overall CTPD will be compared to the percentage of minority students enrolled in funded workforce development career-technical

programs in the district. A point value will be applied to the percent difference range. This same process will be used to determine the maximum of three building locations for each CTPD. For each building location offering funded workforce development career-technical courses, the percentage of minority students enrolled in these programs will be compared to the overall building enrollment and the point value will be assigned. The percentage of minority students enrolled in a postsecondary sub-recipient will be compared to the percentage of minority students enrolled in the career-technical programs in the institution and a point value will be assigned. The table below demonstrates the point value assignment.

Range of % Difference	Points
0 - 5	1
6 - 10	2
11 - 20	3
21 - 30	4
31 - 40	5
41 - 50	6
51 - 60	7
61 and above	8

Table 2: Percentage difference point value assignment for minority student enrollment for the Ohio MOA selection process.

STUDENTS WITH DISABILITIES

The percentage of students with disabilities enrolled in the overall CTPD will be compared to the percentage of students with disabilities enrolled in funded workforce development career-technical programs in the district. A point value will be applied to the percent difference range. This same process will be used to determine the maximum of three building locations for each CTPD. For each building location offering funded workforce development career-technical courses, the percentage of students with disabilities enrolled in these programs will be compared to the overall building enrollment and the point value will be assigned. The percentage of students with disabilities enrolled in a postsecondary sub-recipient will be compared to the percentage of students with disabilities enrolled in the career-technical programs in the institution, and a point value will be assigned. The table below demonstrates the point value assignment.

Range of % Difference	Points
0 - 5	1
6 - 10	2
11 - 20	3
21 - 30	4
31 - 40	5
41 - 50	6
51 - 60	7
61 - 70	8
71 and above	9

Table 3: Percentage difference point value assignment for students with disabilities enrollment for the Ohio MOA selection process

BREAKING A TIE

Should the ranking result in a tie, the date of the last review will be examined using the longest duration since the last visit as the determining factor. If a tie still exists, the sub-recipient with the largest number of CTE participants will be chosen.

EXTENUATING CIRCUMSTANCES

If a selected sub-recipient has experienced a catastrophic event such as an environmental disaster that caused significant damage to the facility, or if the facility is currently undergoing major construction, the sub-recipient next on the ranked list will be selected. Such action will be communicated to OCR and noted in the biennial report.

Annual Review Process

1. The MOA Coordinator will request data reports from the most recent reporting year and conduct risk analysis for selection of the sub-recipients receiving a review.
2. The MOA Coordinator will notify the superintendent of the CTPD and the selected sub-recipients of the review and provide an orientation date.
3. The MOA Coordinator will provide the district or postsecondary institution with the desk review survey.
4. The MOA Coordinator will conduct a desk review using the response from the sub-recipient, ascertaining where there are findings or additional information required.
5. The MOA Coordinator will notify sub-recipients of the date for the virtual or on-site comprehensive review.
6. The MOA Coordinator and team will conduct a virtual or on-site review of the selected locations.
7. The MOA Coordinator has 60 days upon completion of the virtual or on-site review to provide sub-recipients with a letter of findings.
8. Sub-recipients will have 30 days from the date of the letter of findings to submit a voluntary compliance plan.
9. The MOA coordinator reviews and approves the voluntary compliance plans. If not approvable, the plan will be returned to the sub-recipient who has 15 days to make the necessary revisions and resubmit.
10. The MOA coordinator scheduled monthly technical assistance meetings with the sub-recipient until evidence of completion is submitted to the MOA coordinator.
11. Evidence of completion of the negotiated corrections is submitted to the MOA coordinator on or before the negotiated date in the voluntary compliance plan.
12. The MOA coordinator validates the submitted evidence and validates that all negotiated corrections are complete. The review process is complete.

DESK REVIEW SURVEY SAMPLE

1. According to the [1979 Guidelines, IV\(O\)](#), recipients must comply with the requirement to provide an annual notice of career-technical opportunities. The annual notice may be published or posted in a local newspaper, publications and/or other media (school website, public-facing area of the school) that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; as well as the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity.

EVIDENCE REQUESTED: Provide a copy of the building annual notice. Please include a brief description of where the notice may be viewed in the building location or where the notice was published, and photo evidence of their location in the building or publication.

2. According to the Office of Civil Rights, Section 504 and Title IX coordinators must receive adequate initial and ongoing training in the completion of their duties.

EVIDENCE REQUESTED: Provide copies of purchase orders, meeting agendas or other proof of all completed training for the last three years for the district Title IX and 504 coordinator(s).

3. According to the Office of Civil Rights, recipients of Federal Funds must comply with the requirement to publish sexual harassment and discrimination policies.

EVIDENCE REQUESTED: Provide copies of the district sexual harassment and discrimination policies, along with evidence of where they are posted or available for public viewing.

4. According to the [1979 Guidelines, IV \(K\)](#), admission criteria for career-technical education courses or programs must be validated as essential to participation. Factors like past academic performance (grades or grade point average), record of disciplinary infractions, counselors' approval, teachers' recommendations, interest inventories, essays, interviews, and attendance may only be recommended for admission if proved to be necessary for participation.

EVIDENCE REQUESTED: Provide a copy of the career-technical education admissions process for the building location and other locations that may provide career-technical education for the students currently enrolled. Include a description of all criteria for program selection and a description of the process used when programs are oversubscribed. Please include information on whether the district or other career-technical education provider uses, either officially or unofficially, any selection criteria such as past academic performance (grades or grade point average), record of disciplinary infractions, counselors' approval, teachers' recommendations, interest inventories, essays, interviews, attendance, or any other criteria for admission into career-technical education programs.

5. According to the [1979 Guidelines, V \(A\)](#), recipients must ensure their counseling materials and activities, including promotional and recruitment efforts, do not discriminate on the basis of race, color, national origin, sex, gender identity or disability.

EVIDENCE REQUESTED: Provide a sample copy of the following: career-technical education marketing materials (ex: PowerPoint presentations, handouts, advertising flyers, brochures and any other material) used for recruiting or marketing for career-technical education courses or programs; work-based learning agreement for student placement; course or program application.

Sanctions

All applicants for grants, loans and contracts, property, discounts, other federal financial assistance from the U.S. Department of Education (USDOE), or funds made available through USDOE, are required to submit an assurance of compliance with laws and regulations related to Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; and the Boy Scouts of America Equal Access Act of 2001. By signing the assurance, the applicant acknowledges that compliance with the assurance constitutes a condition of continued receipt of Federal financial assistance from or funds made available through USDOE. In the event of a failure to comply, the funds may be terminated, and the applicant may be denied the right to receive further assistance or funds.

Sub-recipients of federal financial assistance are subject to the requirements of this assurance. Violation findings and required corrective actions in the DEW letter of findings for subrecipients relating to violations of Title VI, Title IX, and Section 504, that continue uncorrected per the letter of findings and/or the submitted voluntary compliance plan may result in a district being deemed out of compliance with these laws and therefore out of compliance with its assurance. Based on this failure to comply, **any federal financial assistance** it receives from the Department could be terminated.

Sub-recipients who are out of compliance with civil rights law but are in good standing with the completion of activities in the civil rights process as defined in the local coordinator's manual, are not subject to sanctions. The following state actions shall be taken if a sub-recipient is out of compliance with the civil rights process, including failure to submit required documentation per the guidelines in the local coordinator's manual or failure to submit evidence per the agreed-upon actions in the voluntary compliance plan:

- 1. Hold on Perkins funding** - Documentation or evidence is missing or more than thirty days late. Perkins funds will be placed on hold for disbursement until the sub-recipient is in compliance with the MOA state plan.
- 2. Hold on CTE program approvals and renewals** - Documentation or evidence is missing or more than sixty days late. New programming approval and renewals of existing programming will not occur until the sub-recipient is in compliance with the guidelines in the local coordinator's manual (secondary subrecipients and SOP only).
- 3. Referral to the Office of Civil Rights, United States Department of Education** - Documentation or evidence is missing or more than ninety days late. The hold on Perkins funding (1) and CTE new program approvals and renewals (2) will remain in

effect until the subrecipient is in compliance. In addition, OCR will be notified regarding the sub-recipients non-compliance with the civil rights process.

An extension of deadlines or other requirements may be granted in extenuating circumstances. Examples of extenuating circumstances include an environmental disaster, epidemic, fire, or other circumstances outside of the control of the subrecipient. The MOA Coordinator will be the decision maker with regards to any extensions.

Section 3: Technical Assistance

Technical assistance for all sub-recipients will be provided by the MOA coordinator, who also serves as the Perkins Special Populations Administrator and education program specialists in the Office of Career-Technical Education. Ohio values the support and technical assistance provided by OCTAE and OCR and will include resources they have provided as a part of the comprehensive technical assistance plan.

Specific activities related to technical assistance may be modified as changing needs are identified and addressed. For the purpose of illustration, the following examples of technical assistance are and have previously been provided to all secondary and postsecondary sub-recipients:

TECHNICAL ASSISTANCE PROVIDED BY THE MOA COORDINATOR

1. Civil rights process and on-site review orientations
2. Web site resources page
3. A comprehensive guidelines manual for local coordinators
4. Published written processes
5. ADA or policy reviews upon request
6. Professional development
7. Videos tutorials
8. In-person or virtual consultations
9. Seminars and speaking engagements

TECHNICAL ASSISTANCE PROVIDED FOR THE MOA COORDINATOR OR SUB-RECIPIENT BY OCR

1. OCR reading room materials and resources
2. OCR Web Site
3. National Training Conference for MOA Coordinators
4. Assistance with technical questions
5. Feedback on state reports
6. Seminars and training (collaboration between the MOA coordinator and OCR)

TECHNICAL ASSISTANCE PROVIDED BY PERKINS SPECIAL POPULATION ADMINISTRATOR, MOA COORDINATOR, AND EDUCATION PROGRAM SPECIALISTS

1. The Equity Ambassador Program - Participating Career Technical Planning Districts will designate an ambassador who will act as local equity support and as a subject matter expert for career-technical education. These individuals will be certified through completion of the Equity Ambassador online course in the Learning Management System. The Equity Ambassadors will be invited to participate in professional development for Culturally Responsive Practices.
2. Equity Labs - Hands-on training will be delivered throughout the state in a workshop format and will provide a deeper dive into equitable education practices in the career-technical education environment. There will be a focus on equitable and open access to career-technical education and Culturally Responsive Practices as an effective instructional strategy in improving equity in the classroom.
3. Equity Grant - Equity for Each: Advanced Approaches for Improving Equity in Career-Technical Education Grant, which assists applicants and the Department in identifying and promoting promising best practices for equity in career-technical education delivery. The grant will prioritize applications that include collaboration between secondary and postsecondary partners, with strategies that focus on the promotion or expansion of programs of study aligned with state-identified high-skill, high-wage, or in-demand jobs. Additionally, the grant supports local recipients in the ongoing development and alignment of local data collection systems to improve data-driven decision-making and strategic planning regarding special populations and subgroups.
4. Program consultants will receive training courses from the MOA Coordinator on spotting civil rights issues while conducting site visits as part of their regularly scheduled duties. When issues are identified, they will provide basic support to the sub-recipient or refer the sub-recipient to the MOA coordinator for further technical assistance.
5. State-operated educational districts report limited data to DEW, therefore, support through the MOA program will be offered in the form of technical assistance by the MOA coordinator. Technical assistance will be provided in monthly virtual meetings and as-needed on-site visits.