



METHODS OF ADMINISTRATION STATE PLAN

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METHODS OF ADMINISTRATION? WHAT'S THAT?

As a reminder...

- The ICCB conducts periodic compliance reviews of Illinois community college CTE programs to ensure that they are complying with federal civil rights laws.
- The Methods of Administration (MOA) Program is what gives the ICCB this authority.
- The MOA Program was enacted through the creation of the **Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs**, which were developed by the U.S. Department of Education, Office for Civil Rights in 1979.
- The purpose of the MOA program is to ensure that all students, regardless of race, color, national origin, sex, or disability, have equitable access to high quality CTE programs.

DID YOU KNOW...?

- Each state operates its MOA Program under a state plan that has been approved by the U.S. Department of Education, Office for Civil Rights (USDOE, OCR).
- Until this year, most state plans had not been updated since the creation of the MOA Program (...which was in 1979, remember?!)
- Illinois submitted one plan to the USDOE, OCR, inclusive of both secondary and postsecondary; however, MOA activities will still be conducted separately by the State Board of Education and the Community College Board, respectively.
- Illinois's MOA State Plan was **APPROVED** by the USDOE, OCR, on September 15!

WHY A NEW PLAN NOW?

The short answer...Perkins V!

- On February 6, 2020, the U.S. Departments Office for Career, Technical, and Adult Education and Office for Civil Rights issued an updated Memorandum of Procedures (MOP) regarding state agencies' Methods of Administration (MOA) programs.
- The new MOP provides states with more flexibility in conducting its MOA activities, and encourages states to **harmonize civil rights activities under MOA and Perkins.**
- Since the issuance of the 1979 MOA Guidelines and subsequent MOP (1996), the Perkins Act has come a long way in terms of **equity** and **respective civil rights provisions.**
- The updated MOP also required states to submit an updated MOA State Plan. Hence, why we're here today.

THE OLD MOP VS. THE NEW MOP

The new MOP...

- Allows for states to place more emphasis on technical assistance and preventing discrimination, as opposed to the somewhat rigid nature of the previous MOP.
- Encourages states to utilize existing practices such as Perkins grant monitoring, as well as utilize data gleaned from the Local Application and Comprehensive Local Needs Assessment, to supplement MOA activities.

1. UTILIZATION OF PERKINS DATA AND DATA FROM THE LOCAL APPLICATION AND CLNA

- The ICCB **will continue to employ the use of traditional MOA data** (comparing total institutional enrollment to CTE enrollment by race, sex, and disability) to determine which subrecipients will be selected for review. *These data are mined by each community college's Institutional Research department and then sent to the ICCB to be cleaned, vetted, and analyzed.*
- In addition to the utilization of traditional MOA data sets, **the ICCB will integrate the use of data collected for Perkins V analysis and reporting.** These data are provided in a college's Local Application, submitted annually, and the college's Comprehensive Local Needs Assessment (CLNA).
- Like what?
 - Performance data for all three performance indicators
 - Data disaggregated by subpopulations including race/ethnicity and gender
 - Identified equity gaps as gleaned from the CLNA

2. ADDITION OF TWO MORE REVIEWS PER YEAR

- In past years, the ICCB has conducted two compliance reviews annually. Under the new MOA State Plan, **four reviews** will be conducted annually.
- Why the change?
 - The nature of the reviews will be more focused on providing technical assistance to institutions, and will therefore be less intensive for ICCB staff, as well as college personnel.
 - ICCB staff are no longer required to do an on-site component review for each compliance review.
 - Along similar lines...not all reviews will consist of the same components.

3. ADDITIONAL SELECTION CRITERIA

- **As a reminder...selection criteria is what is used to determine what institutions are chosen for a review in a given year.**
- The ICCB's selection criteria is divided into two tiers, Tier I and Tier II.
- Tier I criteria:
 - Data is utilized to determine **which** subrecipients will receive a review, either on-site or via a desk review.
- Tier II criteria:
 - Determine the **specific scope of the review** (tailored to each college), ex. which specific content areas will be prioritized, after a subrecipient has been selected for review.

ADDITIONAL SELECTION CRITERIA: BREAKDOWN

Tier I Criteria encompass the following components:

- Disproportion of CTE enrollment and total enrollment in the areas of:
 - 1) gender
 - 2) disability
 - 3) race
- When a college last received a civil rights compliance review

Tier II Criteria encompass the following components:

- These criteria are specific to aspects of both MOA activities and Perkins monitoring.
 - 1) A review of Perkins V data as relayed in a subrecipient's Local Application
 - 2) A review of equity gaps as identified through a subrecipient's CLNA
 - 3) A review of the relative age of a subrecipient's facilities and any subsequent alterations to those facilities
 - 4) If the subrecipient's district contains a community of national origin minority individuals with limited English language skills

4. TECHNIQUES FOR REVIEWING SUBRECIPIENTS

- In the past, the same investigative techniques were applied to all reviews, regardless of any specific factors.
- As noted, the new MOP stresses increased flexibility for states in how they review a specific subrecipient.
- It is at the discretion of the MOA Coordinator to determine which investigative techniques to employ when conducting a review, as well as the merits of conducting either an on-site or desk review
- What does this really mean...?
 - **Not all reviews will look the same.** For example, if it is noted that a college's existing infrastructure is old but has undergone major alterations (ex. all new bathrooms), the ICCB can use that to determine the need for conducting a facilities review.

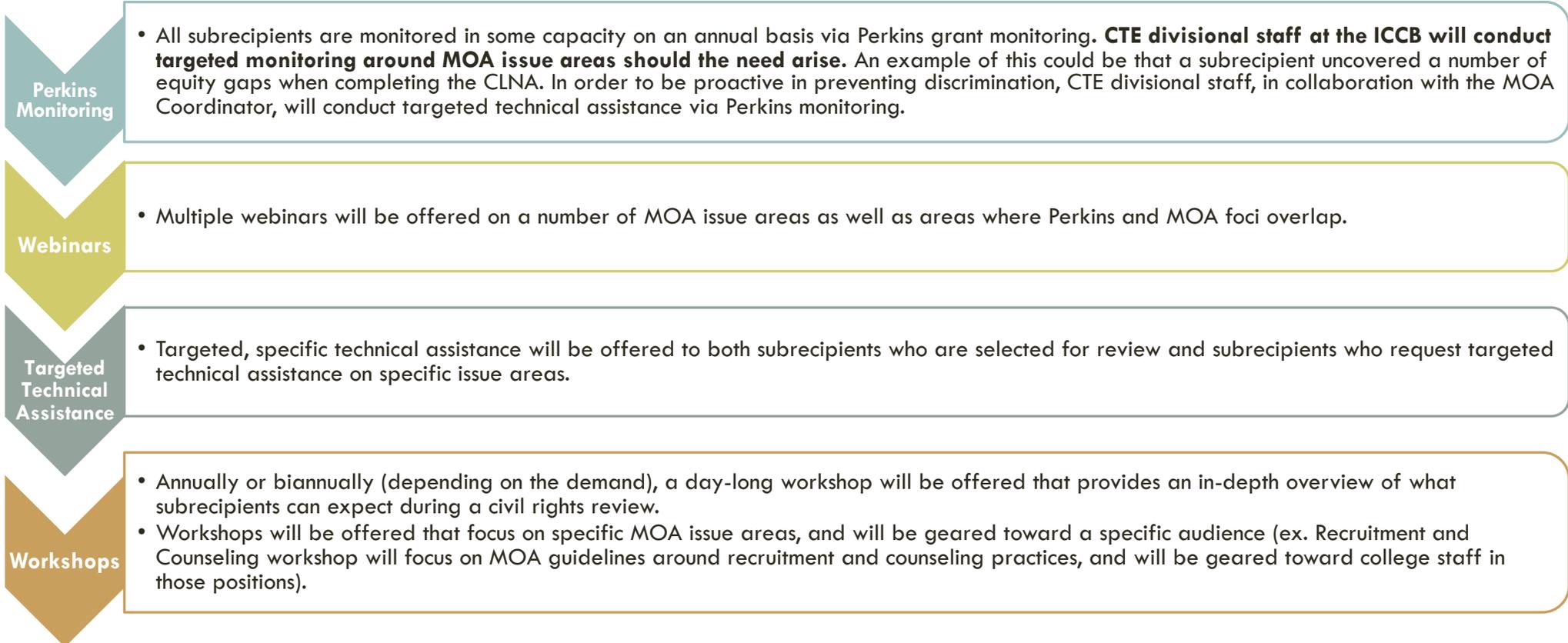
TECHNIQUES FOR REVIEWING SUBRECIPIENTS

- A comprehensive review of a subrecipient's website
- A comprehensive review of a subrecipient's publications, policies, and procedures-
ex. notices of nondiscrimination, grievance procedures, recruitment processes, financial
aid policies
- Interviews of administrators, CTE faculty, support services staff, CTE students, Perkins
Coordinators
- Surveys
- Facilities review
- Perkins monitoring

5. REQUIREMENT OF TECHNICAL ASSISTANCE PARTICIPATION

- **All subrecipients who are selected for review must participate in some capacity in all available technical assistance for that given year.**
- Technical assistance activities will be conducted in collaboration with the Illinois Center for Specialized Professional Support (ICSPS) and other partners. *The ICSPS specializes in developing professional development with an equity lens and will work in tandem with the ICCB to develop and implement technical assistance and outreach activities for the Illinois community college system.*
- The ultimate goal of these TA opportunities is to provide colleges with the tools to be proactive in identifying discriminatory or harmful practices for students or employees, based on race, gender, and disability status.

OUTREACH AND TECHNICAL ASSISTANCE ACTIVITIES





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<https://www.iccb.org/cte/civil-rights-reviews/>