

CIVIL RIGHTS CAREER AND TECHNICAL EDUCATION ON-SITE REVIEW
VOLUNTARY COMPLIANCE PLAN

Community College: Oregon Coast Community College

Reviewers: Karin Moscon, ODE, MOA Coordinator
Luis Juarez, HECC, Education Specialist
Art Witkowski, ODE, CTE Program Specialist
Ed Woods, CTE Regional Coordinator

Dates of Review: June 5 – 7, 2018

Letter of Findings: Issued June 27, 2019

ON-SITE REVIEW FINDINGS

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

ADMINISTRATIVE

2. Annual Public Notification – Noncompliant

Individuals Responsible: Birgitte Ryslinge, Dave Price

Prior to the beginning of each school year, the college must advise students, parents, employees, and general public that all Career and Technical Education opportunities will be offered regardless of race, color, national origin, sex, or disability. (Oregon - marital status and sexual orientation)

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 and Section 504.

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 and Technical Education programs.

Guidelines IV-O

Background:

Oregon Coast Community College sends out a publication called *Catch the Wave* to the community. This includes course listings and requirements, and has a notice of nondiscrimination. It is available in English, but not in Spanish. Interviews with college personnel indicated that there is a Spanish Speaking Community in the service area.

Corrective Action:

Provide the notice, including 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 and Section 504, and Title II. Include a statement that the lack of English language skills will not be a barrier to admission and participation in Career and Technical Education (CTE) programs.

Send this notice and translation to the ODE by January 15, 2020.

**3. Continuous Nondiscrimination Notice – Noncompliant
Individuals Responsible: Cindy Carlson, Joy Gutknecht**

The college 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.

34 CFR 106.9

34 CFR 104.8

34 CFR 100.6(d)

28 CFR 35.106

Background: The college uses a notice of nondiscrimination, but it is not consistently used, and does not contain contact information for Title IX and Section 504 Coordinators, nor is it available in Spanish, which has an established community served by the college.

Corrective Action(s):

Use the comprehensive statement of nondiscrimination that includes all of the federal protected classes; provide contact information for Title IX, Section 504, and Title II Coordinators.

Use the designated comprehensive statement of nondiscrimination consistently on documents and publications, including but not limited to: College and Department web sites, parent/student handbook, staff handbook, and school newspaper or brochures.

- a. Add the statement of nondiscrimination to the following documents:
 - Oregon Coast CC Catalog

- Oregon Coast CC Handbooks (students and staff)
- Other College Publications

Send a copy of the above listed publications with this information labeled to the ODE by December 15, 2019.

- b. Add the statement of nondiscrimination to the Oregon Coast CC web site along with translations in Spanish.

Send a link to the comprehensive statement of nondiscrimination on the website to the ODE by September 15, 2019.

4. Persons Responsible For Coordinating Title II, Title IX and Section 504

Individuals Responsible: Cindy Carlson, Joy Gutknecht

Each college shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX.

The recipient must notify students and employees of the name, office address, and phone number of the designated employee(s).

Title II: 28 CFR 35.107 (a)

Title IX: 34 CFR 106.8

Section 504: 34 CFR 104.7(a)

Background:

The college has designated various individuals to coordinate duties of Title IX, Section 504, and Title II. There is some informal understanding among staff of specific duties, but it is not found in job descriptions, and is not listed as duties for all coordinators. There are no employees who have been designated to oversee and coordinate the efforts of the many who are informally doing the work.

Corrective Action:

The College must designate at least one employee to coordinate the efforts and carry out responsibilities of 504, Title IX, and Title II of the ADA. Send the job description of the individuals who have been designated to coordinate each of those efforts, along with a list of the duties that are performed by each coordinator in that role.

Send the position description and list of duties for each of the three coordinators to the ODE by September 15, 2019.

5. Notice of Contact for Special Needs –

Individuals Responsible: Joy Gutknecht

The college has and uses an approved statement notifying the public whom they should contact for special accommodations by title, phone, and address.

Title II/ADA Federal Code, Subpart E, Communications, 35.160 General (b) (1) (a)

Background: Interviews with college staff and students indicated that the college does make accommodations for community members when needed upon their arrival to school functions. There are instructions on some announcements, but the college does

not have a consistent policy or procedures for departments to use when sponsoring events, nor is it available in Spanish.

Corrective Action(s):

Develop a consistent statement to be used for public notification regarding the existence and location of services, activities, and location of facilities that are accessible and usable by individuals with disabilities.

Send the statement and how it is shared with the public in English and Spanish to the ODE by September 15, 2019.

6. Grievance Procedure – Noncompliant

Individuals Responsible: Cindy Carlson, Joy Gutknecht, Robin Gintner

The college shall adopt and publish a grievance procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex (gender) or disability.

Section 504: 34 CFR 104.7(b)

Title IX: 34 CFR 106.8(b)

Title II: 28 CFR 35.107(b)

ORS 659.850

Background: Current grievance procedures do not specify that they are available for students, staff, and third parties. There is a form provided for filing complaints, but there is not a description of what the complainant or respondent would expect (specific procedures the college will follow). It is not clear who will investigate when a discrimination complaint is filed, and those involved in this process have not all received training. The college explained that they are currently reviewing their grievance procedures.

Corrective Action(s):

Review and update the grievance policy and procedures for students, employees, and third parties. Provide for prompt and equitable resolution of complaints alleging discrimination, and making the informal process optional. Ensure that all persons involved in the investigation or appeal process have received the necessary training for any of the following that they may be involved with: Title IX, Section 504, or Title II of the ADA.

- a. *Send a copy of the new policy and the new procedures to the ODE, along with its location (link) on the OCCC web page by October 15, 2019.*
- b. *Send dates and materials from trainings to the ODE by March 15, 2020.*

ADMISSIONS

1. Student Eligibility and Admission Issues – Noncompliant

Individuals Responsible: Linda Molino, Larry Boles

The college 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.

Guidelines IV-A

The college 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.

Guidelines IV-K

Background:

Currently, the college course catalogue lists the following as a requirement for Aquarium Sciences, but could not validate as essential for participation in the program:

- a. Intermediate algebra
- b. Reading and writing requirements beyond those required for entrance into the college
- c. An experiential assessment that does not include volunteering

Corrective Action: Because disproportional enrollment occurs at OCCC, review the applications process for entry to Career and Technical Education programs to ensure that the criteria for admission does not create barriers and is essential to participation, and not just being used as a filtering process.

Send the new Aquarium Sciences Application to the ODE along with the method that Career and Technical Education courses will use to review other criteria for admission by March 15, 2020.

Recommendation: Examine data about who has been accepted to limited entry programs, and who has not, in order to remove any unnecessary barriers for admissions.

2. Preadmission Inquiries

Individuals Responsible: Linda Molino, Larry Boles

The college must avoid preadmission inquiries about marital, parental, or disability status.

Title IX: 34 CFR 106.21(c)

Section 504: 34 CFR 104.42 (b) (4)

Background: The online application used for students to apply to be a student in the college contains questions about the following:

Employment and employer	Race
Permanent resident/ immigrant	Previous last name
Single Parent/ Displaced Homemaker	Gender (M,F,Declined)

Corrective Action: Change the application so that it does not ask questions about marital/parental status by removing Single Parent/Displaced homemaker and Previous last name fields from the application.

The following could be perceived to have a “chilling effect” on enrollment.

a. Employment and Employer: The college personnel did not know why this was on the application and indicated that they do not use the information.

Recommendation: Remove from application by September 1, 2019.

b. Race, Permanent Resident/immigrant (Title VI, Race and National Origin): The college uses race for reporting purposes, staff reported to ODE that they do not use resident/immigrant status.

Recommendation: Ask for race as an optional field, remove Permanent Resident/immigrant from the application.

Send proof of implementation to the ODE by October 15, 2019.

3. Unlimited Occupational Opportunities for Persons with a Disability

Individuals Responsible: Linda Molino, Larry Boles, Cindy Carlson

The college must not deny access to Career and Technical Education 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.

Section 504: 34 CFR 104.10

Section 504: 34 CFR 104.43(c)

Guidelines IV-N

Background: Applications for the Nursing program ask about and limit student entry for certain medical conditions such as pregnancy and other health issues. The Nursing Assistant application asks if students will require accommodations.

Corrective Action: Change the application so that it does not ask questions about health and medical issues. *Send the new application and rubric to the ODE by January 15, 2020.*

Background: The college does not provide training for the multiple staff members involved in advising students. Because of this, the college could not show that faculty and staff do not discourage students with disabilities from participating in programs. Interviews with students, as well as applications, indicated that access is not available to all students.

Corrective Action(s):

Develop and provide training for all staff involved in advising students to ensure that students with disabilities are not denied access to Career and Technical Education and academic programs.

Send proof of implementation to the ODE by March 15, 2020.

RECRUITMENT

Individuals Responsible: Dave Price, Steve Seney

Background: The ODE and CCWD reviewed and analyzed documentation that was provided by the college and interviewed staff related to recruitment activities for both the college and the Career and Technical Education programs.

4. A Community with Persons of Limited English Proficiency - Noncompliant

If a college's service area contains a community with persons of limited English proficiency, information must be available to that community in its language.

Guidelines V-E

Background: The college indicated in interviews that there is a Spanish speaking community within the college service area. However, promotional materials for Career and Technical Education and other classes in the college are not available in any language other than English.

Corrective Action: Continuously monitor demographics of the community being served by OCCC. Provide translations/interpretation for recruiting activities, posters, and other publications.

Send copies of these to the ODE by March 15, 2020.

SERVICES FOR STUDENTS WITH DISABILITIES

Individuals Responsible: Darci Adolf, Chris Rogers

1. No Exclusion Based on Disability – Noncompliant

No qualified person with a disability is excluded from, denied benefits of, or subjected to discrimination in any course, program, service, or activity on the basis of disability.

Section 504: 34 CFR 104.4(a)

Title II: 28 CFR 35.130(a)

Guidelines IV-N

Students with disabilities must not be excluded from Career and 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.

Guidelines IV-N

Background: Student and staff interviews indicated that the college is not consistent with platforms used for course materials shared by faculty, or for online courses. The staff often share documents in a format that is not able to be used with their own reader software. Faculty members that the review team questioned on an informal basis revealed that they do not believe students with disabilities should be in their classes. Students commented in interviews that their requests to staff concerning these issues will go unaddressed.

Corrective Action: Create policies and training for students and staff who are posting course materials to ensure that all materials are available to students with disabilities. *Send proof of software availability to the ODE by January 15, 2020.*

- a. *Send copies of the policy and training to the ODE by March 15, 2020.*
- b. Ensure that all instructional staff, including adjunct instructors receive the training. *Send proof of implementation to the ODE by **June 15, 2020.***

4. Course Tests and Evaluations – Noncompliant

Course examinations or other procedures for evaluating students' academic achievements are administered in such a way that disabled students' aptitudes or achievement levels or other relevant factors are measured and not the disability.

Section 504: 34 CFR 104.44(c)

Title II: 28 CFR 35.130(b) (8)

Guidelines IV-N

Background:

The labs used for testing did not have adjustable tables available for use by persons with disabilities.

Corrective Action:

Provide a reserved adjustable workstation in computer labs with access to software used by the college for use by persons with a disability.

Send photo proof of implementation to the ODE by October 15, 2019.

PROGRAM ACCESSIBILITY

Individuals Responsible: Chris Rogers

1. Section 504/ADA Accessibility Issues - Noncompliant

The college 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.

Existing facilities/Section 504 (34 CFR, 104.22)

New construction/Section 504 (34 CFR 104.23)

New construction/Section 504 (34 CFR 104.23)

New construction/ ADA (28 CFR 35.151)

Building Name	Year of Construction	Alterations	Date of Alteration	Purpose/Programs	Construction Standard
Central Campus	2009	Relocation of the Student Store	2013	Administration, instruction, allied health	1991 ADA
North Center	2008	None		Student Services, instruction, SBDC	1991 ADA
South Center	2009	Expanding of teaching lab	2013	Allied health, EMT	1991 ADA
AQS	2011	None		Aquarium Science	2010 ADA

Parking Lots

Name of Lot	Year of Origin	Alterations (repaving or restriping)	Date of most recent Alterations	Total # of parking spaces	Number of ADA accessible spaces	Number of van accessible spaces	Construction Standard
Central Campus lot	2009	Restripe every 4 years (most recently in 2017)	Addition of 38 spots, South end of lot	200	9	2	2010 ADA
North center lot	2008	Restripe every 4 years (most recently 2018)	None	59	3	1	2010 ADA
South center lot	2009	Restripe every 4 years (most recently 2014)	None	46	2	1	2010 ADA

The following findings and actions are specific to buildings whose construction or alterations are using the 1991 ADA Standards, as described below.

New construction under ADA Title II – Built after January 26, 1992, and before September 15, 2010; exercising the option to follow 1991 ADA Standards

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.)

Title II: 28 CFR 35.151 (a), (b) & (c) (1)

North Center:

North Center is located in Lincoln City, Oregon, and houses Student Services, instruction, and SBDC.

The following chart shows door pressure that is greater than the amount for accessible use and is out of compliance with the 1991 ADA Standard 4.13.12 requiring no more than 5 pounds of pressure.

Location	Current Force Identified
Testing Area	20 lbs
GED Computer Room	8 lbs
Men's restroom	15 lbs
Class 124	7 lbs
room 208	8 lbs
2 nd floor men's restroom	11 lbs

Corrective Actions/Door Pressure:

Adjust the above listed doors to be consistent with 2010 ADA Standard 404.2.9 requiring interior hinged doors to have an opening force of no more than 5 lbs.
Send proof of implementation to the ODE by September 25, 2019.

Background: In all restrooms in the North Center, the reach required to operate the paper towel dispenser is 52 inches, which does not comply with the 1991 ADA Standard 4.27.3 requiring reach ranges of 30 inches forward reach, and 48 inches side reach.

Corrective Action/Dispensers:

Lower the dispensers in all three restrooms to require no more than a 48 inch reach from the floor level to the lever for operation.
Send photo proof of completion to the ODE by September 15, 2019.

Background:

The Check in Counter/Information Desk in the student commons area has a counter that is 41 inches high, which is not in compliance with the 1991 ADA Standard 7.2 requiring a portion of the counter to be no higher than 36 inches.

Corrective Action: Since this is a forward approach, provide a portion of the counter surface that is a minimum of 30 inches long and a maximum of 36 inches high, consistent with the 2010 ADA Standard 904.

Send photo proof of implementation to the ODE by January 15, 2020.

South Center:

The South Center is located in Waldport, Oregon, and houses Nursing and Nursing Assistance programs.

Background: The automatic door opener is catching, which makes it difficult to open. This is not consistent with the 1991 ADA Standard 4.13

Corrective Action: Provide a working door opener that meets the 2010 ADA Standard 404.3. *Send photo proof of implementation to the ODE by September 15, 2019.*

Background: In all restrooms, the reach required to operate the paper towel dispenser is 52 inches, which does not comply with the 1991 ADA Standard 4.27.3 requiring reach ranges of 30 inches forward reach, and 48 inches side reach.

Corrective Action/Dispensers:

Lower the dispensers in all three restrooms to require no more than a 48 inch reach from the floor level to the lever for operation.

Send photo proof of completion to the ODE by October 15, 2019.

Background: The eyewash station in the science classroom is at a height of 41 inches for the sink/eye wash, requiring an individual to be standing and leaning over; the overhead pull in the unit requires a reach of 65 inches. This does not comply with the 1991 ADA Standards 4.15, and 4.27.3.

Corrective Actions/Eyewash Station:

Provide eyewash stations meeting the 2010 ADA standards by completing the following:

- Signage for emergency equipment must be highly visible, even when not in use, so that it can be easily located consistent with 2010 ADA 703.
- The activation handles (pull rod and sink eye wash lever) for turning on the shower should not require more than five pounds of force to operate (2010 ADA 404.2.9).
- Any pull rods must be located at or below 48 inches, consistent with 2010 ADA Standard 308, and the sink portion must be adjusted so that the spout height is no more than 36 inches above the finish floor, consistent with ADA 602.4.

Send photo proof of implementation to the ODE by April 15, 2020.

Main Campus:

The following chart shows door pressure that is greater than the amount for accessible use and is out of compliance with the 1991 ADA Standard 4.13.12 requiring no more than 5 pounds of pressure.

Location	Current Force Identified
Restroom in Admin	14 lbs each
Pre Lab	13 lbs
2 nd floor restrooms	13 lbs and 15 lbs
Math Lab (room 47)	8 lbs
Career and Transfer Readiness Office	8 lbs
Computer Lab	14 lbs
Rm 20	14 lbs
All Gender Restrooms	21 lbs each
Community Room	13 lbs

Corrective Actions/Door Pressure:

Adjust the above listed doors to be consistent with 2010 ADA Standard 404.2.9 requiring interior hinged doors to have an opening force of no more than 5 lbs. *Send photo proof of implementation to the ODE by October 15, 2019.*

Background, Restrooms in Admin, Student Services, all gender, and 2nd floor:

- a. Each of the men’s and women’s restrooms in the admin office, student services area, and on the second floor, along with both of the all-gender restrooms, requires a reach of 52 inches to operate the paper towel dispensers, which is not in compliance with the 1991 ADA Standard 4.27.3 requiring reach ranges of 30 inches forward reach, and 48 inches side reach.
- b. The hardware on the doors for accessible stalls in all of the above mentioned restrooms requires pinching to operate, which is not compliant with 1991 ADA Standard 4.13.9.

Corrective Action/Dispensers:

- a. Lower the dispensers in all restrooms to require no more than a 48 inch reach from the floor level to the lever for operation, as is required by 2010 ADA Standard 604/606.
- b. Replace the hardware with hardware that is consistent with 2010 ADA Standard 309.4/404.2.7, operable with one hand that does not require tight grasping, pinching, or twisting of the wrist, located between 34 and 48 inches from the floor surface. *Send photo proof of completion to the ODE by October 15, 2019.*

The following findings refer to facilities that have been modified or are New construction under ADA Title II – Built on or after March 15, 2012; follow 2010 ADA Standards for Accessible Design.

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 2010 ADA Standards for Accessible Design (2010 ADA Standards) Available at:

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

Title II: 28 CFR 35.151 (c) (3)

Aquarium Science Center:

Background: The following chart shows door pressure that is greater than the amount for accessible use and is out of compliance with the 2010 ADA Standard 404.2.9 requiring no more than 5 pounds of pressure.

Location	Current Force Identified
Teaching Lab	11 lbs
Student Workshop	10 lbs
Animal Holding Lab	10 lbs
Rm 108 and 109	10 lbs
Food Prep Room	10 lbs
Men's and Women's Restrooms	15 lbs each

Corrective Actions/Opening Force:

Adjust the above listed doors to be consistent with 2010 ADA Standard 404.2.9 requiring interior hinged doors to have an opening force of no more than 5 lbs.

Send photo proof of implementation to the ODE by October 15, 2019.

WORK STUDY, COOPERATIVE EDUCATION AND JOB PLACEMENT
Individuals Responsible: Sharon Hahn, Joy Gutknecht

2. Assurance of Employer Nondiscrimination– Noncompliant

A college that assists employers and prospective employers in making employment opportunities available to any of its students must ensure that the employer does not discriminate based on race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and pay.

Title VI: 34 CFR 100.3(b)

Title IX: 34 CFR 106.38

Section 504: 34 CFR 104.46(b)

Guidelines VII-A

Background: The college does not include the Notice of Nondiscrimination in the Student Employment Handbook, nor is there an assurance of nondiscrimination signed by employers and the college.

Corrective Action:

- a. Include the college's Notice of Nondiscrimination in the Student Employment Handbook. *Send a copy to the ODE by January 15, 2020.*
- b. Provide an assurance of nondiscrimination to be signed by the employer and the college on the written workplace and practicum agreements. *Send a copy to the ODE by January 15, 2020.*

GUIDANCE AND COUNSELING

Individuals Responsible: Cindy Carlson, Ben Kaufman

1. Counseling Materials and Activities Do Not Discriminate

Colleges 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.

Title IX: 34 CFR 106.36 (a)

Section 504: 34 CFR 104.47 (b)

Guidelines V-A

Background:

Students reported that while some had positive advising experiences, others did not. The quality of advice depended on the knowledge of the advisor. The college does not have a procedural manual or written procedures for those who are advising students.

Corrective Action:

- a. Review and revise the counseling/advising process for students in order to eliminate barriers that may have a discriminatory impact.
- b. Create written procedures to be followed by those involved in advising.

Train all staff involved in advising students to ensure consistency in eliminating barriers. *This training should include graduation requirements, advisory methods for selecting a course of study, protocols for minimum number of visits per student, and any other information necessary to insure quality guidance to students.*

Send proof of implementation to the ODE by **June 15, 2020**.

5. Disproportional Enrollment – Noncompliant

Individuals Responsible: Dan Lara, Cindy Carlson

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.

Title IX: 34 CFR 106.36

Guidelines V-B

Background: The college currently does not have a method in place to review when disproportionate enrollment occurs, or to determine if it is a result of unlawful discrimination in counseling or appraisal activities, as is required in Vocational Education Guidelines.

Corrective Action:

- a. Create a process for how data will be collected, reviewed, and assessed. *Send proof of implementation to the ODE by **June 15, 2020**.*
- b. Create a written policy and procedures for counseling practices, including how to assess and respond to disproportionate enrollment, in order to ensure that the disproportion is not the result of discrimination in counseling or appraisal practices and materials. *Send this written policy and procedures to the ODE by March 15, 2020.*
- c. Provide implicit bias training to all staff working with students to ensure that the disproportionate enrollment is not the result of bias. *Send proof of implementation to the ODE by **June 15, 2020**.*

Recommendation: Use the Dear Colleague Letter on Title IX and Gender Equity as a resource for this process.

<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201606-title-ix-gender-equity-cte.pdf>

FINANCIAL ASSISTANCE

Individuals Responsible: Kimberly Jones

4. Aid Information in Other Languages

National origin minority persons with limited English language skills receive information about financial assistance in their own language.

Guidelines VI-B

Background: The college does not provide information about foundation scholarships in languages other than English.

Corrective Action:

Provide information about scholarship opportunities in Spanish and publish in a manner that will allow persons from the Spanish speaking community to be aware of possible financial assistance opportunities.

Send the ODE a copy of this list and information on how it is being disseminated by January 15, 2020.

EMPLOYMENT

Individuals Responsible: Joy Gutknecht

2. Notice to Faculty of Nondiscrimination - Noncompliant

The college must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.

Guidelines VIII-B

Background: Currently, the college provides an abbreviated statement to notify staff about policy or procedures guaranteeing that the college does not discriminate on the basis of race, color, national origin, sex, or disability.

Corrective Action(s):

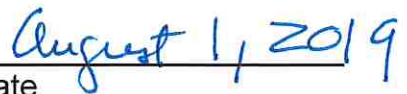
Add complete Notice of Nondiscrimination to employment applications and handbooks.
Send a copy to the ODE by October 15, 2019.

Acknowledgement:

Oregon Coast Community College acknowledges receipt of the Letter of Findings and Voluntary Compliance Plan for Programs and Activities, agrees to implement the Corrective Actions required, and acknowledges its ongoing civil rights responsibilities.



Dr. Birgitte Ryslinge, President,
Oregon Coast Community College



Date

Please return a signed copy of this Voluntary Compliance Plan by July 15, 2019, to:

Karin Moscon
Office of Equity, Diversity, and Inclusion
Oregon Department of Education
255 Capitol Street NE
Salem OR 97310-0203

Status Reports/Materials re: Implementation of Corrective Actions
should also be sent to Karin Moscon at the above address