<Month dd, yyyy>

Dear Superintendent <Superintendent Name> and Principal <Principal Name>:

Subject: 2015-16 Letter of Findings for Civil Rights Reviews

The following is the Letter of Findings (LOF) for Trinity High School and the Trinity Alps Unified School District for the Civil Rights Review (CRR) of schools that offer career and technical programs conducted from <mm/dd/yyyy – mm/dd/yyyy> by the Office of Equal Opportunity (OEO). We appreciate your cooperation and assistance during our review.

The reviews utilize the 2015-16 CRR Instrument which is based upon federal civil rights requirements pertaining to vocational education programs, commonly referred to as CTE programs, under the Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (Guidelines) (34 CFR Part 100 Appendix B). Parallel citations of state civil rights laws and regulations have been provided to ensure that all students have access to the programs.

Each LEA found to have one or more CRR items in violation must complete the enclosed Voluntary Compliance Plan (VCP) form resolving all violations indicated on their LOF report. The VCP is to be e-mailed to oeocte@cde.ca.gov within 60 calendar days from receipt of the LOF report. Following receipt of the LOF, LEA staff may contact the OEO for technical assistance with the resolution process, as needed.

The findings resulting from our review of Trinity High School and Trinity Alps Unified School District follow.
CRR-CTE OUTCOMES BY PROGRAM ITEM AND MONITORING DIMENSION:

A. ADMINISTRATIVE ISSUES

CRR-CTE 01 (Administrative)
CONTINUOUS NONDISCRIMINATION NOTICE

Requirements for CRR-CTE 01:
A district/school 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 district/school that it does not discriminate on the basis of race, color, national origin, sex, or disability. Title IX: 34 CFR § 106.9; 504: 34 CFR § 104.8; related California legal citations: CCR, Title 5, Chapter 5.3 § 4622, 4960(b), 4900 et. seq.

Findings and Analysis for CRR-CTE 01:
The CRR-CTE 01 assessment regarding continuous nondiscrimination notices did not reveal any evidence of a violation.

CRR-CTE 02 (Administrative)
PERSONS RESPONSIBLE FOR COORDINATING 504, TITLE II, TITLE IX, AND CALIFORNIA CODE OF REGULATIONS TITLE 5

Requirements for CRR-CTE 02:
Each district/school shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under 504, Title II, and Title IX and related California legal citations: CCR, Title 5, Chapter 5.3 § 4621(b).

The district/school must notify students and employees of the name or title, office address, and phone number of the designated employee(s). Title IX: 34 CFR § 106.8(a); 504: 34 CFR § 104.7(a); related California legal citations: CCR, Title 5, Chapter 5.3 § 4961

Findings/Analysis for CRR-CTE 02:
The CRR-CTE 02 assessment regarding the designation of and providing contact information for the education equity coordinator(s) did not reveal any evidence of a violation.

CRR-CTE 03 (Administrative)
ANNUAL PUBLIC NOTIFICATION
Requirements for CRR-CTE 03:
Prior to the beginning of each school year, districts and schools must advise students, parents, employees and general public that all CTE opportunities will be offered regardless of race, color, national origin, sex or disability. 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 Guidelines: 34 CFR § 100 Appendix B (IV-O); related California legal citations: CCR, Title 5, Chapter 5.3 § 4622, 4961 et. seq.

Findings/Analysis for CRR-CTE 03:
The CRR-CTE 03 assessment regarding the publication and distribution of the annual public nondiscrimination notice did not reveal any evidence of a violation.

CRR-CTE 04 (Administrative)
GRIEVANCE PROCEDURE

Requirements for CRR-CTE 04:
A district/school 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. All complaints or allegations of discrimination will be kept confidential during any informal and/or formal complaint procedures except when disclosure is necessary during the course of an investigation, in order to take subsequent remedial action and to conduct ongoing monitoring. Harassment on the basis of sex, sexual orientation, gender, ethnic group identification, race, ancestry, national origin, religion, color, or mental or physical disability is a form of discrimination, and as such, may result in disciplinary taken. In the case of an employee, such disciplinary action may include termination. The focus of this review covers citations of federal laws that provide protection on the basis of race, color, national origin, gender, or disability. Related state laws provide added protection on the basis of sexual orientation, ancestry, ethnic group identification, or religion. Title II: 28 CFR § 35.107(b); Title IX: 34 CFR § 106.8(b); 504: 34 CFR § 104.7(b); related California legal citations: CCR, Title 5, Chapter 5.3 § 4621, 4960 et. seq.

Findings/Analysis for CRR-CTE 04:
The CRR-CTE 04 assessment regarding the publication and maintenance of grievance procedures did not reveal any evidence of a violation.

B. SITE LOCATION AND STUDENT ELIGIBILITY CRITERIA ISSUES

CRR-CTE 05 (Site Location and Student Eligibility Criteria)
STUDENT ELIGIBILITY

Requirements for CRR-CTE 05:
District/school 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, sexual orientation, gender, ethnic group identification, ancestry, religion, or color. Guidelines: 34 CFR § 100 Appendix B (IV-A); related California legal citations: CCR, Title 5, Chapter 5.3 § 4920-27; EC § 200, 220 and 221.5

Findings/Analysis for CRR-CTE 05:
The CRR-CTE 05 assessment in regards to student eligibility did not reveal any evidence of a violation.

CRR-CTE 06 (Site Location and Student Eligibility Criteria)
SITE SELECTION & MODIFICATION

Requirements for CRR-CTE 06:
District/school 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. Districts and schools must locate CTE facilities at sites that are readily accessible to both minority and nonminority communities and that do not tend to identify the facility or program as intended for minority or nonminority students. Guidelines: 34 CFR § 100 Appendix B (IV-B)

A district/school may not add to, modify, or renovate the physical plan of a CTE facility in a manner that creates, maintains, or increases segregation on the basis of race, color, national origin, sex, disability, sexual orientation, gender, ethnic group identification, ancestry, or religion. The focus of this review covers citations of federal laws that provide protection on the basis of race, color, national origin, gender, or disability. Related state laws provide added protection on the basis of sexual orientation, ancestry, ethnic group identification, or religion. Guidelines: 34 CFR § 100 Appendix B (IV-D); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Findings/Analysis for CRR-CTE 06:
The CRR-CTE 06 assessment in regards to school site selection and modifications did not reveal any evidence of a violation.

CRR-CTE 07 (Site Location and Student Eligibility Criteria)
RESIDENCY

Requirements for CRR-CTE 07:
A district/school may not establish, approve, or maintain geographic boundaries that unlawfully excludes students on the basis of race, color, national origin, ethnic group identification or ancestry. Guidelines: 34 CFR § 100 Appendix B (IV-C); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Findings/Analysis for CRR-CTE 07: The CRR-CTE 07 assessment in regards to student residency did not reveal any evidence of a violation.

C. RECRUITMENT ISSUES

CRR-CTE 08

Requirements for CRR-CTE 08: Districts and schools must conduct their recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, disability, sexual orientation, gender, ethnic group identification, ancestry, or color. Recruitment materials’ description of career and occupational opportunities should not be limited on the basis of race, color, national origin, sex, disability, sexual orientation, gender, ethnic group identification, ancestry, or color. The focus of this review covers citations of federal laws that provide protection on the basis of race, color, national origin, gender, or disability. Related state laws provide added protection on the basis of sexual orientation, ancestry, ethnic group identification, or religion. Guidelines: 34 CFR § 100 Appendix B (V-C); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.; EC § 221.5

To the extent possible, recruiting teams should represent persons of different races, national origins, sexes, and disabilities. Districts and schools must ensure that counselors can effectively communicate with students with limited English proficiency and with students with sensory impairments. Guidelines: 34 CFR § 100 Appendix B (V-D); related California legal citations: EC § 221.5

Districts and schools 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. If a district/school’s service area contains a community with persons of limited English proficiency, information must be available to that community in its language. Guidelines: 34 CFR § 100 Appendix B (V-E); related California legal citations: EC § 221.5

Findings/Analysis for CRR-CTE 08:
The CRR-CTE 08 assessment in regards to the LEA’s student recruitment activities did not reveal any evidence of a violation.

D. ADMISSIONS ISSUES

CRR-CTE 09

Requirements for CRR-CTE 09:
Admission policies, procedures and criteria may not exclude students from CTE programs on the basis of race, color, national origin, sex or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin or sex or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental or disability status should be avoided. A district/school may not assess candidates for admission to CTE 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: 34 CFR § 100 Appendix B (IV-K); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

A district/school 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 nondisabled persons. 504: 34 CFR § 104.33; Guidelines: 34 CFR § 100 Appendix B (IV-N); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

A district/school may not restrict admission to CTE programs because the applicant, as a member of a national origin minority group with limited English language skills, cannot participate in and benefit from CTE to the same extent as students whose primary language is English. An elementary and secondary school is responsible for identifying applicants with limited English language skills and assessing their ability to participate in Career and Technical Education. An elementary and secondary school must take steps to open all CTE programs to national origin minority students with limited English proficiency. Guidelines: 34 CFR § 100 Appendix B (IV-L); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Findings/Analysis for CRR-CTE 09:
The CRR-CTE 09 assessment in regards to the LEA’s admissions policies did not reveal any evidence of a violation.

E. STUDENT FINANCIAL ASSISTANCE ISSUES
CRR-CTE 10

Requirements for CRR-CTE 10:
Education agencies shall not limit honors, awards, and scholarships to a group on the basis of sex, unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the agency’s nondiscrimination policy.

A school district may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex. Because financial aid is often the stumbling block for those historically underrepresented in postsecondary education, secondary schools should assist all students preparing for postsecondary experiences, including disadvantaged students, to become aware of this requirement. Interviews with the following persons may clarify compliance with this standard: financial aid staff, guidance counselors, department chairs, Title IX Coordinator, 504/ADA Coordinator and bilingual staff. Financial assistance regarding post secondary opportunities is available to all students regardless of sex, race, color, national origin, or disability. 504: 34 CFR § 100.3(b), 104.4, 106.37(a); Guidelines: 34 CFR § 100 Appendix B (VI-B)

Findings/Analysis for CRR-CTE 10:
The CRR-CTE 10 assessment in regards to the LEA’s financial assistance policies did not reveal any evidence of a violation.

F. CAREER COUNSELING PROGRAM ISSUES

CRR-CTE 11

Requirements for CRR-CTE 11:
The focus of this review covers citations of federal laws that provide protection on the basis of race, color, national origin, gender, or disability. Related state laws provide added protection on the basis of sexual orientation, ancestry, ethnic group identification, or religion. Counseling programs may not include steering of students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, disability status, sexual orientation, gender, ethnic group identification, ancestry, or religion. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content,
and illustration. Districts and schools 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, disability, sexual orientation, gender, ethnic group identification, ancestry, or religion. Title II: 28 CFR § 35.130; Title IX: 34 CFR § 106.36 (a); 504: 34 CFR § 104.33, 104.35; Guidelines: 34 CFR § 100 Appendix B (V-A, V-B); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Counselors do not direct students into programs based on their race, color, national origin, sex, disability, sexual orientation, gender, ethnic group identification, ancestry, or religion. Districts and schools 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, disability, sexual orientation, gender, ethnic group identification, ancestry, or religion. 504: 34 CFR § 104.33, 104.35, 104.37, 106.36(a); Guidelines: 34 CFR § 100 Appendix B (V-B); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Districts and schools may not counsel students with disabilities toward more restrictive career objectives than nonstudents with disabilities with similar abilities and interests. Guidelines: 34 CFR § 100 Appendix B (V-B)

If disproportionate enrollments occur, efforts must be made to ensure that counseling services and materials are not responsible. Districts and schools must take steps to ensure that any disproportionate enrollment does not result from unlawful discrimination in counseling activities. Title IX: 34 CFR § 106.36(c); Guidelines: 34 CFR § 100 Appendix B (V-B); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Findings/Analysis for CRR-CTE 11:
The CRR-CTE 11 assessment in regards to the LEA’s guidance counselor activities, counseling program policies, and counseling materials did not reveal any evidence of a violation.

G. SERVICES FOR STUDENTS WITH DISABILITY ISSUES

CRR-CTE 12

Requirements for CRR-CTE 12:
A qualified person with a disability may not be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A district/school may not
restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. 504 and ADA Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function and the able-bodied should not put them in a position where they might be “uncomfortable.” However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services.

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. Title II: 28 CFR § 35.130(a); 504: 34 CFR § 104.4(a); Guidelines: 34 CFR § 100 Appendix B (IV-N); related California legal citations: EC § 200, 220

Students with disabilities must not be excluded from CTE, career, or academic programs, courses, services or activities due to equipment barriers or because necessary related aids and services or auxiliary aids are not available. 504: 34 CFR § 104.4, 104.33; Guidelines: 34 CFR § 100 Appendix B (IV-N); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

A district/school that operate an elementary or secondary program or activity must provide a free, appropriate public education (FAPE) to each qualified disabled person in its jurisdiction. 504: 34 CFR § 104.33

The district/school 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. 504: 34 CFR § 104.33(b), 104.35(c).

The district/school must provide procedural safeguards through which parents or guardians may obtain an impartial review of the evaluation and placement actions. 504: 34 CFR § 104.36

Disabled secondary students must be placed in the regular educational environment of any CTE, 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. Guidelines: 34 CFR § 100 Appendix B (VI-A); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.
Secondary students with disabilities are placed in a CTE program only when the 504 FAPE requirements for evaluation, placement, and procedural safeguards have been satisfied. 504: 34 § CFR 104.35, 104.36; Guidelines: 34 CFR § 100 Appendix B (VI-A)

Findings/Analysis for CRR-CTE 12:
The CRR-CTE 12 assessment in regards to the LEA’s policies pertaining to services for students with disabilities did not reveal any evidence of a violation.

H. 504 AND AMERICANS WITH DISABILITIES ACT ACCESSIBILITY ISSUES

A list of facilities reviewed for compliance with this section is attached. The list includes the specific facilities reviewed, construction or alterations dates for each facility, and applicable standards.

CRR-CTE 13 (504/ADA Accessibility)
504 ACCESSIBILITY ISSUES; BUILT/ALTERED ON OR PRIOR TO 06/03/1977

Requirements for CRR-CTE 13:
For existing district/school facilities under 504 that were built or altered beginning June 3, 1977 or earlier, a district/school shall operate its program or activity so that when each part is viewed in its entirety, it is “readily accessible” to disabled persons. A district/school is not required to make each of its existing facilities or every part of a facility accessible to and usable by persons with disabilities. 504: 34 CFR § 104.23(b)

Findings/Analysis for CRR-CTE 13:
The CRR-CTE 13 assessment in regards to disabled accessibility issues under 504 for buildings built or modified before 06/03/1977, revealed the following evidence of a violation.

Findings:

1. Facility review revealed Trinity High School does not have accessible showers, for males or females, on campus.
2. Travel pathways to access some classroom are not accessible - currently ramps under construction between the cafeteria and gym.

CRR-CTE 14 (504/ADA Accessibility: ANSI)
504 ACCESSIBILITY ISSUES; BUILT/ALTERED BETWEEN 06/04/1977 & 01/17/1991

Requirements for CRR-CTE 14:
Each facility or part of a facility constructed by, on behalf of, or for the use of a district/school under 504 that were built or altered between June 4, 1977 and January 17, 1991, inclusive, shall be 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. 504: 34 CFR § 104.23 (prior to January 18, 1991 amendment)

Findings/Analysis for CRR-CTE 14:
The CRR-CTE 14 assessment in regards to disabled accessibility issues under 504 for buildings built or modified between 06/04/1977 and 01/17/1991, inclusive, did not reveal any evidence of a violation.

CRR-CTE 15 (504/ADA Accessibility: UFAS)
504/ADA ACCESSIBILITY ISSUES; BUILT/ALTERED BETWEEN 01/18/1991 & 01/26/1992

Requirements for CRR-CTE 15:
Each facility or part of a facility constructed by, on behalf of, or for the use of a district/school or public entity under 504 that were built or altered between January 18, 1991, and January 26, 1992, inclusive, shall be 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 § 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. Title II: 28 CFR § 35.151; 504: 34 CFR § 104.23

Findings/Analysis for CRR-CTE 15:
The CRR-CTE 15 assessment in regards to disabled accessibility issues under 504 for buildings constructed or modified after 01/18/1991 and following UFAS guidelines did not reveal any evidence of a violation.

CRR-CTE 16 (504/ADA Accessibility: UFAS or ADAAG)
504/ADA ACCESSIBILITY ISSUES; BUILT/ALTERED ON OR AFTER 01/27/1992

Requirements for CRR-CTE 16:
Each facility or part of a facility constructed by, on behalf of, or for the use of a district/school 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. (Appendix A to 34 CFR § 36). UFAS or the 1991 ADA Standard apply to
facilities constructed or altered on or after January 27, 1992 and before September 15, 2010. Departures from particular requirements permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. Title II: 28 CFR § 36, Appendix D; 504: 34 CFR § 104.23

Findings and Analysis for CRR-CTE 16:
The CRR-CTE 16 assessment regarding disabled student accessibility issues under 504 and the ADA for buildings constructed or modified on or after 01/26/1992 and following the <UFAS/ADAAG> did not reveal any evidence of a violation.

CRR-CTE 17 (504/ADA Accessibility: ADAAG)
504/ADA ACCESSIBILITY ISSUES; BUILT/ALTERED ON OR AFTER 03/15/2012

Requirements for CRR-CTE 17:
Each facility or part of a facility constructed by, on behalf of, or for the use of a district/school or 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. Between September 15, 2010 and March 14, 2012, a subrecipient may utilize UFAS, the 1991 ADA Standards or the 2010 ADA Standards. The 2010 ADA Standards apply to facilities constructed on or after March 15, 2012. Cite 36 C.F.R Part 1191, Appendices B & D

Findings and Analysis for CRR-CTE 17:
The CRR-CTE 17 assessment regarding disabled student accessibility issues under 504 and the ADA for buildings constructed or modified between 09/15/2010 and 03/14/2012 and following the <UFAS/ADAAG (1991 ADA)/2010 ADA > standards OR buildings constructed or modified on or after 03/15/2010 and following the 2010 ADA Standards did not reveal any evidence of a violation.

I. COMPARABLE FACILITIES ISSUES

CRR-CTE 18

Requirements for CRR-CTE 18:
Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female or students with disabilities should be located in similar proximity to the associated classrooms, shops or laboratories. If separate programs or facilities exist for
students with disabilities, they are comparable to those for students without disabilities. 
Guidelines: 34 CFR § 100 Appendix B (VI-A)

Changing rooms, showers, and other facilities for students of one sex are comparable to those provided to students of the other sex. Title IX: 34 CFR § 106.33; Guidelines: 34 CFR § 100 Appendix B (VI-D); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

Findings/Analysis for CRR-CTE 18:
The CRR-CTE 18 assessment in regards to comparable facilities utilized by both male and female students and also those comparable facilities utilized by disabled students and nondisabled students did not reveal any evidence of a violation.

J. WORK STUDY EDUCATION/JOB PLACEMENT AND APPRENTICESHIP ISSUES

CRR-CTE 19 (Work Study Education/Job Placement and Apprenticeship)
WORK STUDY, COOPERATIVE EDUCATION, JOB PLACEMENT, AND APPRENTICESHIP TRAINING ISSUES

Requirements for CRR-CTE 19:
An agency not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment, workplace learning sites or apprenticeship training programs. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin, or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin or disability status. Agencies should have written agreements whereby the cooperating worksite indicates that they will not discriminate. It is necessary to review these written agreements, the assignments of students presently in such programs and the placement process to see whether any such patterns exist. Opportunities in work study, cooperative education, job placement and apprenticeship training programs are available equally to all students regardless of race, color, national origin, sex, or disability. Title VI: 34 CFR § 100.3(b); Title IX: 34 CFR § 106.31(d); 504: 34 CFR § 104.4(b); Guidelines: 34 CFR § 100 Appendix B (VII-A)

A district/school that assist employers and prospective employers in making employment opportunities 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. Title VI: 34 CFR § 100.3(b); Title IX: 34 CFR § 106.38; Guidelines: 34 CFR § 100 Appendix B (VII-A)
Findings/Analysis for CRR-CTE 19:
The CRR-CTE 19 assessment in regards to work-study, cooperative education, and job placement programs did not reveal any evidence of a violation.

CRR-CTE 20 (Work Study Education/Job Placement and Apprenticeship)
APPRENTICESHIP TRAINING PROGRAM ISSUES

Requirements for CRR-CTE 20:
In the same way that an employer may not discriminate and the educational agency may not work with any that do discriminate, it also has the responsibility to ensure that entities sponsoring apprenticeship programs such as unions do not discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. A written agreement is recommended whereby the apprenticeship program indicates it will not discriminate on these bases. It is necessary to review apprenticeship assurance forms, the assignments of students presently in such programs and the placement process to see whether any such patterns exist. Schools may not enter into an agreement for the provision or support of apprentice training for students or union members with any labor union or other sponsor that discriminates against its members or applicants on the basis of race, color, national origin, sex, or disability. Title VI: 34 CFR § 100.3(c); Title IX: 34 CFR § 106.31(d); 504: 34 CFR § 104.11(a)(4); Guidelines: 34 CFR § 100 Appendix B (VII-B)

A written agreement between the agency and the labor union or other sponsor includes an assurance of nondiscrimination on the basis of race, color, national origin, sex, or disability. Guidelines: 34 CFR § 100 Appendix B (VII-B)

Findings/Analysis for CRR-CTE 20:
The CRR-CTE 20 assessment in regards to the LEA’s apprenticeship training program did not reveal any evidence of a violation.

K. EMPLOYMENT ISSUES

CRR-CTE 21

Requirements for CRR-CTE 21:
Districts/schools are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, national origin, sexual orientation, gender, ethnic group identification, ancestry, religion, or mental or physical disability. Specific issues include
employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination. Districts/schools may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of sex or disability. Districts and schools 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. Districts/schools may not make pre-employment inquiries concerning disability, marital, or parental status. Title VI: 34 CFR § 100.3(c); Title IX: 34 CFR § 106.51; 504: 34 CFR § 104.11, 104.13; Guidelines: 34 CFR § 100 Appendix B (VIII-A); related California legal citations: CCR, Title 5, Chapter 5.3 § 4900 et. seq.

The district/school must notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability. Title IX: 34 CFR § 106.57, 106.60; 504: 34 CFR § 104.14; Guidelines: 34 CFR § 100 Appendix B (VIII-B)

The district/school 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. Title IX: 34 CFR § 106.54; 504: 34 CFR § 104.11-12; Guidelines: 34 CFR § 100 Appendix B (VIII-D)

District/schools must provide equal employment opportunities for teaching and administrative positions to applicants with disabilities 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. 504: 34 CFR § 104.12; Guidelines: 34 CFR § 100 Appendix B (VIII-E)

Findings/Analysis for CRR-CTE 21:
The CRR-CTE 21 assessment in regards to employment issues did not reveal any evidence of a violation.

L. ADDITIONAL CALIFORNIA NONDISCRIMINATION LAWS

CRR-CTE 22 (Additional California Nondiscrimination Laws)
SEXUAL HARASSMENT ISSUES

Requirements for CRR-CTE 22:
District/school shall not sexually harass another person in the work or educational environment. No person from or in the educational or work environment shall retaliate
against a complainant, witness, or other person who supports or participates in a sexual harassment investigation. CCR, Title 5, § 4915-17, 4963; EC § 200, 220, 230(g)

Findings/Analysis for CRR-CTE 22:
The CRR-CTE 22 assessment regarding additional state laws and regulations pertaining to sexual harassment complaints and retaliation related to sexual harassment complaints and investigations did not reveal any evidence of a violation.

CRR-CTE 23 (Additional California Nondiscrimination Laws)
NONDISCRIMINATION POLICIES PERTAINING TO STUDENT CLUBS

Requirements for CRR-CTE 23:
District/school may not exclude any person from membership in student clubs regardless of sex, sexual orientation, gender, ethnic group identification, race, ancestry, national origin, religion, color, or mental or physical disability. CCR, Title 5, Chapter 5.3 § 4925; EC § 200, 220

Findings/Analysis for CRR-CTE 23:
The CRR-CTE 23 assessment regarding additional state nondiscrimination laws and regulations pertaining to student clubs did not reveal any evidence of a violation.

CRR-CTE 24 (Additional California Nondiscrimination Laws)
NONDISCRIMINATION POLICIES PERTAINING TO PARENTAL, FAMILY, OR MARITAL STATUS

Requirements for CRR-CTE 24:
District/school may not exclude any person from any program or activity or employment because of actual or potential parental, family, or marital status, or the exclusion of any person because of pregnancy or related conditions. CCR, Title 5, Chapter 5.3 § 4914

Findings/Analysis for CRR-CTE 24:
The CRR-CTE 24 assessment regarding additional state nondiscrimination laws and regulations pertaining to a student’s parental status, family status, marital status, or pregnancy and related conditions did not reveal any evidence of a violation.

CRR-CTE: 25 (Additional California Nondiscrimination Laws)
EXTRACURRICULAR ACTIVITIES

Requirements for CRR-CTE 25:
A district/school may not provide or otherwise carry out any of its extracurricular programs or activities separately, or require or refuse participation by any of its students
on the basis of sex, sexual orientation, gender, ethnic group identification, race ancestry, national origin, religion, color, or mental or physical disability. CRR, Title 5, Chapter 5.3 § 4925; EC § 200, 220

Findings/Analysis for CRR-CTE 25:
The CRR-CTE 25 assessment regarding state nondiscrimination laws and regulations pertaining to participation in extracurricular programs and activities did not reveal any evidence of a violation.

NO ADDITIONAL 2015-16 CRR FINDINGS FOLLOW

If there are any questions regarding the CRR process, please contact the OEO at 916-445-9174 or by e-mail at oeocte@cde.ca.gov.

Sincerely,

Sharon Felix-Rochon, Director
Office of Equal Opportunity

SFR:<Reviewer First and Last Initial; lower case>