



**METHODS OF ADMINISTRATION STATE PLAN TO THE U.S. DEPARTMENT OF EDUCATION,
OFFICE FOR CIVIL RIGHTS**

July 01, 2020

SECTION I: INTRODUCTORY INFORMATION

This section describes the process by which the MOA plan was developed.

The Illinois Methods of Administration (MOA) State Plan for postsecondary institutions was developed by the Illinois Community College Board (ICCB), the coordinating state agency over the Illinois community college system. The state’s MOA Coordinator for postsecondary institutions works in the career and technical education (CTE) division as the Director for CTE, and was in charge of developing the MOA State Plan. ICCB Executive staff provided feedback and conducted the final review of the plan; these individuals include the Senior Director for CTE, the Deputy Executive Director, and the Executive Director.

Throughout the development of the plan, members of the community college system were kept abreast of changes to the Memorandum of Procedures (MOP), as well as the general components of the new Illinois MOA State Plan. Communication was distributed in February 2020. In addition, the ICCB held discussions with the Illinois State Board of Education (ISBE), the regulatory state agency over Illinois secondary schools, as it is preparing the MOA State Plan for secondary schools.

The ICCB has always strived for accountability and transparency regarding state MOA practices, and continuously provides in-depth technical assistance. These practices allowed for the MOA Coordinator to develop the new plan with insights and feedback from the community college system. Refer to Section III: Technical Assistance, for a thorough review of outreach and technical assistance activities.

SECTION II: PLAN FOR PERFORMING OVERSIGHT RESPONSIBILITIES

This section sets out the state’s compliance program to prevent, identify, and remedy discrimination based on race, color, national origin, sex, and disability in the CTE programs of subrecipients. This section also outlines the state’s plans to analyze civil rights data and information; conduct periodic compliance reviews; notify subrecipients of illegal discrimination to remedy; and address voluntary corrective actions.

Section II. A.: Civil Rights Data Analysis Overview

Subrecipient Universe

Illinois’ MOA Universe for postsecondary institutions will include all 48 community colleges, as the Illinois community college system is the recipient of federal Perkins funding. A community college is eligible for federal Perkins funds as long as it has a minimum of one fully developed and approved CTE program of study.

Subrecipient	
1.	Black Hawk College
2.	Carl Sandburg College
3.	College of DuPage
4.	College of Lake County
5.	Danville Area Community College
6.	Elgin Community College
7.	Frontier Community College
8.	Harold Washington College

9.	Harry S Truman College
10.	Heartland Community College
11.	Highland Community College
12.	Illinois Central College
13.	Illinois Valley Community College
14.	John A. Logan College
15.	John Wood Community College
16.	Joliet Junior College
17.	Kankakee Community College
18.	Kaskaskia College
19.	Kennedy-King College
20.	Kishwaukee College
21.	Lake Land College
22.	Lewis & Clark Community College
23.	Lincoln Land Community College
24.	Lincoln Trail College
25.	Malcolm X College
26.	McHenry County College
27.	Moraine Valley Community College
28.	Morton College
29.	Oakton Community College
30.	Olive-Harvey College
31.	Olney Central College
32.	Parkland College
33.	Prairie State College
34.	Rend Lake College
35.	Richland Community College
36.	Richard J. Daley College
37.	Rock Valley College
38.	Sauk Valley Community College
39.	Shawnee Community College
40.	South Suburban College
41.	Southeastern Illinois College
42.	Southwestern Illinois College
43.	Spoon River College
44.	Triton College
45.	Wabash Valley College
46.	Waubonsee Community College
47.	Wilbur Wright College
48.	William Rainey Harper College

Data Collection and Analysis

The ICCB will 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) submitted in even number years beginning in 2020, and include the following:

- Performance data for all three performance indicators- 1P1: Postsecondary Retention and Placement, 2P1: Earned Recognized Postsecondary Credential, and 3P1: Nontraditional Program Enrollment
- Data specific to special populations as defined by Perkins V
 - Individuals with disabilities
 - Individuals from economically disadvantaged families, including low-income youth and adults
 - Individuals preparing for non-traditional fields
 - Single parents, including single pregnant women
 - Out-of-workforce individuals
 - English learners
 - Homeless individuals
 - Youth who are in, or have aged out of, the foster care system
 - Youth with a parent who is in the armed forces and is on active duty
- Data disaggregated by subpopulations including race/ethnicity and gender
- Identified equity gaps as gleaned from the CLNA

Subrecipient Selection Criteria

The ICCB’s selection criteria is divided into two tiers, Tier I and Tier II. Tier I criteria are the criteria that will be utilized to determine which subrecipients will receive a review, either on-site or via a desk review. The data will assist ICCB in identifying potential equity gaps. Once the subrecipients have been selected, the MOA Coordinator will utilize Tier II criteria to determine the scope of the review, ex. which specific content areas will be prioritized, if a facilities review needs to be conducted, etc.

Tier I: Tier I criteria encompass the following components: 1) enrollments by gender; 2) enrollments by disability; 3) enrollments by race; 4) prior review. This is the criteria that will be used to determine which subrecipients will be selected for review for a specific year. The following provides more information regarding the selection criteria, including the scales that will be utilized to assign points.

Selection Criteria One-Three: Gender, Disability and Race

In order to ensure that appropriate emphasis is given to the degree of difference between CTE enrollments and total college-wide enrollment, the ICCB will conduct an analysis of community college enrollments by gender, disability and race. Based on the percentage point difference between the overall college enrollments and the CTE program enrollments for gender, disability and race, community colleges will be divided into quartiles. Points will then be assigned for each quartile based upon the specific variable (i.e. gender, disability and race) utilizing the following scale:

POINTS ASSIGNED:					
GENDER		DISABILITY		RACE	
Quartile	Points	Quartile	Points	Quartile	Points
G1	4	D1	4	R1	4
G2	3	D2	3	R2	3
G3	2	D3	2	R3	2
G4	1	D4	1	R4	1

Selection Criteria Four: Prior Reviews

Utilizing the following scale, the ICCB will assign points to a community college based on if and/or when the community college received an on-site review.

POINT ASSIGNMENTS FOR PRIOR REVIEWS:	
PRIOR REVIEW	POINTS ASSIGNED
The community college has never been reviewed.	10
The community college was reviewed over 5 years ago.	5
The community college was reviewed within the last 5 years.	0

Each year, a list will be generated based on the procedure outlined above. Points assigned for selection criterion one through four- 1) enrollments by gender; 2) enrollments by disability; 3) enrollments by race; 4) prior review, respectively- will be tabulated and combined, providing a raw score. Community colleges will be ranked based on this raw score. No community college will receive a review more than once every five years. The community college with the highest score, which has not received a review in the last five years, will be visited in that specific academic year. *In the event of a tie*, the tie breaker will be based on prior review. Whichever college was reviewed most recently will not be selected. If both colleges have either never been reviewed or were previously reviewed during the same year, the college with the highest number of CTE enrollments will be selected for review.

Tier II: As aforementioned, Tier II criteria are the criteria that will be utilized to determine the scope of a review, after a subrecipient has been selected. These criteria are specific to aspects of both MOA and Perkins monitoring. Tier II criteria include, but are not limited to, the following components: 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.

Section II. B.: Processes and Procedures to Conduct Compliance Reviews of Selected Subrecipients
Number and Scope of Reviews

Four reviews will be conducted each year, the scope of which will be prioritized based on a review of a subrecipient’s Tier II criteria. In order to determine that prioritization, potential issue areas of review include, but are not limited to, the following:

- Administrative Requirements (notices of nondiscrimination, grievance procedures, review of compliance coordinators)
- Recruitment, Admissions, and Counseling (admissions criteria and access to classes, counseling practices for individuals with limited English language skills and those with hearing impairments, recruitment and promotion of CTE programs and services)
- Accessibility of CTE programs and campus facilities
- Services for Students with Disabilities
- Financial Assistance
- Work-study, Cooperative Programs, and Job Placement
- Employment
- Web and Document Accessibility

Investigative Techniques to be Utilized

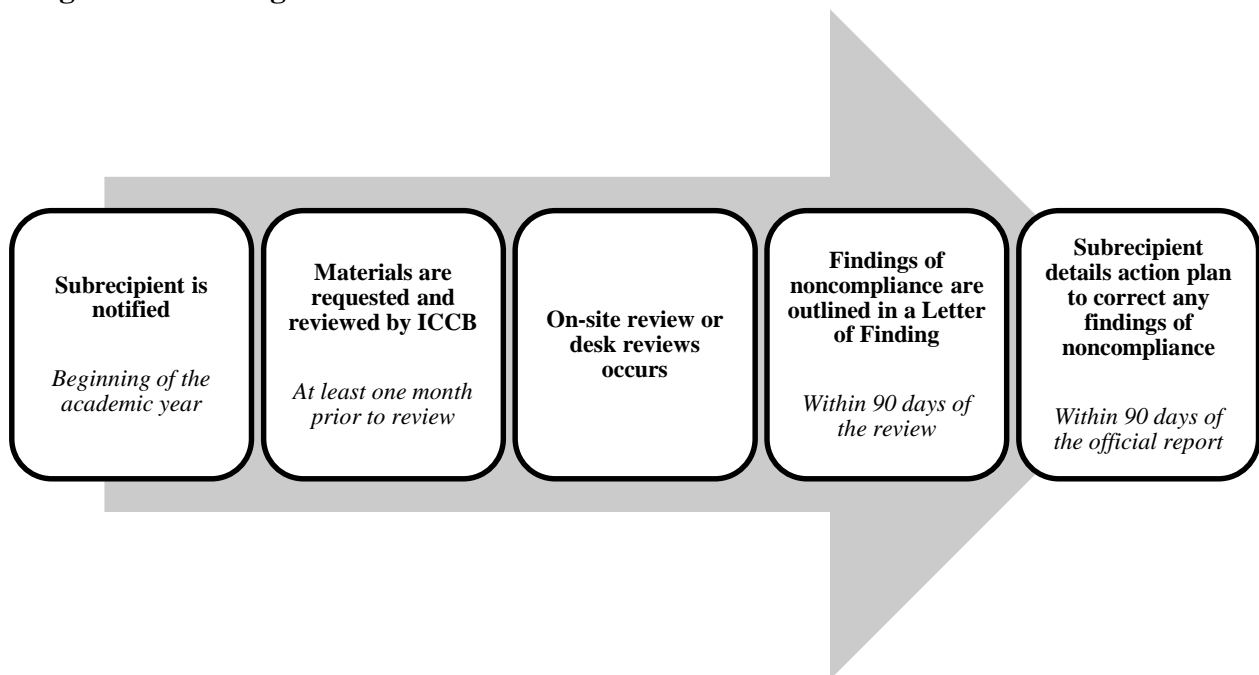
Based on the review of Tier I and Tier II selection criteria, the MOA Coordinator will determine which investigative techniques will be the most useful in the review of a particular subrecipient. These techniques will vary based on the scope of a review. For example, if it is noted that a subrecipient’s campus facilities are considerably older than most, or have not undergone significant alterations since their original date of construction, the MOA Coordinator may deem it necessary to conduct an on-site review of the subrecipient’s facilities to ensure physical accessibility is in compliance with federal civil rights laws and regulations. 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. Those techniques that will be utilized for each review are noted as such. These techniques can include, but are not limited to, the following:

- A comprehensive review of a subrecipient’s website (all reviews)
- 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 (all reviews in some capacity)
- Surveys (all desk reviews)
- Facilities review
- Perkins monitoring

Notification of Selection for Review and Conclusion of a Review

All subrecipients selected for review will be notified at the beginning of each academic year. Subsequent activities will follow a basic timeline as outlined below. Once a subrecipient’s action plan to correct any findings of noncompliance is approved by the ICCB, the review will be considered final and that subrecipient will be notified as such.

Figure 1: Civil Rights Review Timeline



Findings of Noncompliance: Letter of Finding and Corrective Action Plan

Within 90 days of the completion of a review, the ICCB will issue to the subrecipient a Letter of Finding (LOF). The LOF will compile the results of the review and will detail all areas where it was concluded that the subrecipient is out of compliance with federal civil rights law(s). The LOF will also outline all issue areas that were reviewed and why, as well as the investigative techniques that were utilized to review those areas.

If it is concluded that a subrecipient is out of compliance with federal civil rights law(s), it must submit to the ICCB a Corrective Action Plan (CAP). The CAP is due to the ICCB within 90 days of the receipt of the LOF and must detail the following information:

- How the subrecipient will correct any finding(s) of noncompliance
- Responsible party for ensuring the correction of finding(s) of noncompliance
- The timeline for completing the corrective action(s)
- What evidence will be submitted to the ICCB to verify the correction of any finding(s) of noncompliance

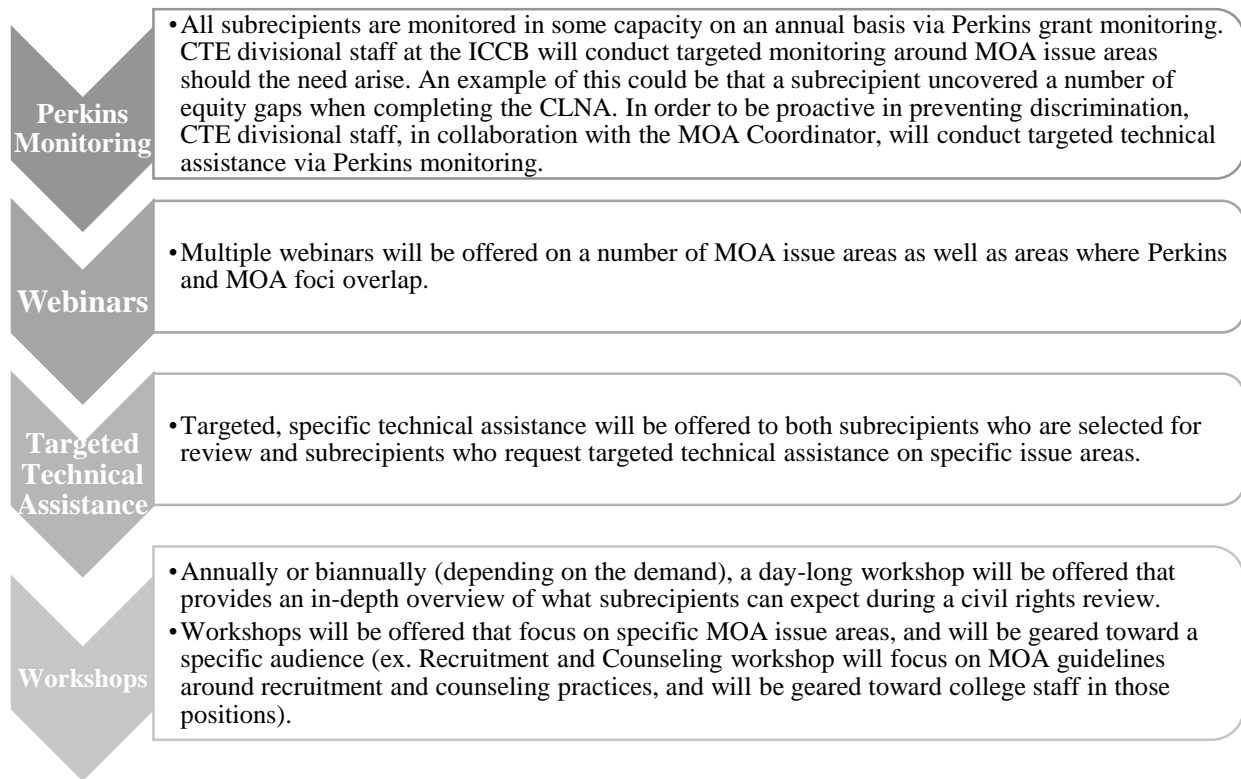
Once the ICCB approves the CAP, the subrecipient will be required to periodically submit verification of correction to the ICCB, based on the previously agreed upon timeline.

SECTION III: TECHNICAL ASSISTANCE

This section describes the state's plans to conduct outreach to subrecipients, offer technical assistance, and let subrecipients request technical assistance to improve access to CTE.

The ICCB holds itself to a high standard of accountability and transparency in terms of its MOA activities and expectations for the Illinois community college system to practice inclusive and non-discriminatory practices. 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 (ICSPPS) and other partners. The ICSPPS 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. While these technical assistance activities and resources aim to provide a deep understanding of MOA procedures, the ultimate goal 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. These outreach and technical assistance activities are outlined below.

Figure 2: Civil Rights Review Technical Assistance



The MOA State Plan was completed by Natasha Allan, Director for CTE and MOA Coordinator. Contact information is included below.

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