This manual is intended to aid vocational education personnel in eliminating unnecessary discrimination from vocational education programs, services, and activities. It includes a user handbook, a set of transparent masters, and a set of audience handout masters. These components are formatted in question-and-answer style to facilitate a speaker presentation of the basic Office of Civil Rights guidelines and requirements, and requirements for nondiscrimination in vocational education programs. The 51 questions group around these topical areas: overview questions, requirements for society, requirements for education programs, requirements for proprietary schools. These topical areas are concerned with the concerns of vocational educators and the issue of nondiscrimination in terms of policy, funding, monitoring, access to facilities, access to programs, equal educational opportunity, and student employment. Resources have been selected for the topical areas.
51 QUESTIONS
ON THE OCR GUIDELINES

Prepared by
Raymond E. Harlan
The National Center for Research in Vocational Education

The National Center for Research in Vocational Education
The Ohio State University
1960 Kenny Road
Columbus, Ohio 43210
January 1981
THE NATIONAL CENTER MISSION STATEMENT

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- Developing educational programs and products
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For further information contact:

The Program Information Office
The National Center for Research in Vocational Education
The Ohio State University
1960 Kenny Road
Columbus, Ohio 43210
Telephone: (614) 486-3655 or (800) 848-4815
Cable: CTVOCEDOSU/Columbus, Ohio
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FOREWORD

51 Questions on the OCR Guidelines is an interpretive kit intended to increase basic awareness of civil rights requirements for vocational education programs, services, and activities. The kit should be of interest to all vocational educators, including teachers, administrators, federal agency personnel, researchers, and the National Center staff.

It is one of several products developed during the third year of the National Center's knowledge transformation program. The review and synthesis in each topic area is intended to communicate knowledge and suggest applications. The series should be of interest to all vocational educators, including teachers, administrators, federal agency personnel, researchers, and the National Center staff.

The profession is indebted to Raymond E. Harlan for his scholarship in preparing this kit. Recognition is also due Douglas Adamson, Director, State Office of Civil Rights, New York; Lloyd Alston, Assistant Superintendent of Vocational Education, Baltimore City Public Schools; and R. Michael Morris, the National Center for Research in Vocational Education, for their critical review of the manuscript. Staff assistance was contributed by Shelley Grieve, Dr. Carol Kowle, and Alta Moser. Editorial assistance was provided by the Field Services staff.

Robert E. Taylor
Executive Director
The National Center for Research in Vocational Education
EXECUTIVE SUMMARY

51 Questions on the OCR Guidelines is designed to aid vocational education personnel in eliminating unlawful discrimination from vocational education programs, services, and activities. This working manual is a mixed-media kit that includes a user handbook, a set of transparency masters, and a set of audience handout masters. These components are formatted in question and answer style to facilitate speaker presentation of the basic concepts, issues, and requirements for nondiscrimination in vocational education programs contained in the Office for Civil Rights Guidelines.

The fifty-one questions group around these topical areas: Overview Questions; Requirements for the State Agency; Requirements for Vocational Education Programs; and Requirements for Proprietary Schools. These topical areas cut across the concerns of vocational educators and the issue of nondiscrimination in terms of policy, funding, monitoring, access to facilities, access to programs, equal educational opportunity, and student employment. Resources have been selected for the topical areas.
INTRODUCTION

This kit has been designed to meet the needs of vocational educators at all levels in presenting the main provisions of the Office for Civil Rights Guidelines. The Guidelines were issued to assist vocational educators in eliminating unlawful discrimination from vocational education programs, services, and activities. The Guidelines, as agency regulations, have the status and effect of law; hence, the provisions of the Guidelines impact on vocational education programs at all levels. We all need to know what the Guidelines say. This kit is designed to meet this need for knowledge.

The kit has three components: this handbook, a set of transparency masters for overhead projectors, and a set of audience handout masters for duplication. These three components are inter-related.

The handbook provides a question and answer text in a format that suggests leads you might use to get across the main concepts of the Office for Civil Rights Guidelines to a selected audience. Summary remarks of the text are provided, too, and appear in the margins.

The overhead projector transparency masters are keyed and titled. You may wish to use a transparency made from the master at the point indicated in the handbook. The use of a particular transparency is suggested by its key number in the margin of the handbook text, flagged with a 0.

The audience handout masters are also keyed and titled. You may wish to use an audience handout made from the master at the point indicated in the handbook. The use of a particular audience handout is suggested by its key number in the margin of the handbook text, flagged with a #. The audience handout masters provide material for discussion or reflection by your selected audience.

The separation of the three components of your kit enables you to use it with the greatest flexibility relative to your audience, your interests, and your presentation objectives. By all means, use the components of the kit as best serves your purposes.

A note area has been provided beneath each question of the text, providing room for your own personal notes.

Selected resources have been provided at the end of a section for further reading.
LIST OF ALL QUESTIONS

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1. What are the OCR Guidelines?
2. Why were the Guidelines issued?
3. Who is affected by the Guidelines?
4. What do the Guidelines mean to program personnel?
5. When do the Guidelines take effect?
6. What are the Guidelines all about?
7. What topics are discussed in the Guidelines?

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OVERVIEW QUESTIONS (Questions 1-7)

1. What are the OCR Guidelines?
2. Why were the Guidelines issued?
3. Who is affected by the Guidelines?
4. What do the Guidelines mean to program personnel?
5. When do the Guidelines take effect?
6. What are the Guidelines all about?
7. What topics are discussed in the Guidelines?
QUESTION 1

WHAT ARE THE OCR GUIDELINES?

- Guidelines is shorthand for Office for Civil Rights' "Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, or Handicap in Vocational Education Programs" (Federal Register, Vol. 44 (March 21, 1979), pp. 17, 162-17, 175; hereafter cited as Federal Register).

- The intent of the Guidelines is to assist administrators in eliminating discrimination and denial of services in vocational education programs and activities.

- The Guidelines were issued by the Office for Civil Rights, Department of Health, Education, and Welfare, to explain the civil rights responsibilities of state and local agencies that administer or offer vocational education programs.

- The Guidelines provide guidance to administrators about the requirements of TITLE VI of the Civil Rights Act of 1964 (P.L. 88-352); TITLE IX of the Education Amendments of 1972 (P.L. 92-318); and Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112). The guidelines explain how these laws apply to vocational education policies, programs, and activities.

- The Guidelines provide a framework for a national policy of nondiscrimination in vocational education programs and activities.

NOTES

\[ ^1 \] = Transparency
\[ \text{♦} \] = Handout
QUESTION 2

WHY WERE THE GUIDELINES ISSUED?

- The fact of unlawful discriminatory practices in vocational education programs and activities provided an impetus to issue the Guidelines. During compliance reviews of vocational education schools, the Office for Civil Rights identified civil rights violations during its 1973-78 survey.

- Legal proceedings and court litigation provided a second impetus to issue the Guidelines. As a result of Adams v. Califano (1973), the Department of Health and Human Services must enforce civil rights legislation in vocational education programs by means of compliance reviews, surveys of enrollment data, and the publication of guidelines.

NOTES
QUESTION 3

WHO IS AFFECTED BY THE GUIDELINES?

- The Guidelines apply to recipients of federal financial assistance that administer or offer vocational education programs or activities.

- "Recipient" includes state and local education agencies and schools.

- The Guidelines affect boards of education for public school districts, administrative boards for specialized vocational schools, and administrative boards for technical vocational schools.

- The Guidelines also apply to junior colleges, community colleges, four-year colleges providing vocational training, and a variety of secondary and postsecondary vocational education institutions.
QUESTION 4

WHAT DO THE GUIDELINES MEAN TO PROGRAM PERSONNEL?

- The Guidelines mean a cooperative effort by all vocational education personnel at the state and local levels to end unlawful discrimination.

- The Guidelines mean an obligation on the part of vocational education personnel to provide equal opportunity to all applicants, students, and staff of vocational education programs.

- The Guidelines mean a commitment by all vocational education personnel to correct past unlawful discrimination and to guard against future unlawful discrimination in vocational education policies, programs, and activities.

A cooperative effort to end discrimination

An obligation to provide equal opportunity

A commitment to attain and obtain compliance
QUESTION 5

WHEN DO THE GUIDELINES TAKE EFFECT?

- The Guidelines went into effect on March 15, 1979, and they remain in effect indefinitely or until amended or modified by law or regulation.

NOTES

△ = Transparency
WHAT ARE THE GUIDELINES ALL ABOUT?

- The Guidelines are all about what vocational education personnel can and must do to eliminate unlawful discrimination based on race, color, national origin, sex, or handicap in vocational education policies, programs, and services.

- The Guidelines are all about people and about how "being a person" correlates with getting an equal chance to be an individual.

- The Guidelines are all about what the leaders in vocational education policy or programs and decision-making processes must do to ensure that each and every person counts individually and equally in vocational education.

- To make each individual count, leaders must ensure that race, color, national origin, sex, or handicap are not used as factors on which to make policy decisions, except to overcome or remedy the effects of past discrimination.

- Leaders must ensure that no decision of policy results in unlawful discrimination against the members of the vocational education community or results in the denial of services or benefits of vocational education programs to any individual.

NOTES
QUESTION 7

WHAT TOPICS ARE DISCUSSED IN THE GUIDELINES?

- The Guidelines begin with "Supplementary Information." This preface states the legal and factual bases for the Guidelines. The contents of the Guidelines spread across nine sections.

- **Section I: Scope and Coverage** defines "recipient" and gives examples of education agencies and schools that are affected by the Guidelines.

- **Section II: Responsibilities Assigned Only to State Agency Recipients** states the chief civil rights responsibilities of receivers of federal dollars and gives a statement of procedures and practices.

- **Section III: Distribution of Federal Financial Assistance and Other Funds for Vocational Education** focuses on the requirements for the distribution of federal dollars, allocation formulas, and awarding of grants or contracts.

- **Section IV: Access and Admission of Students to Vocational Education Programs** addresses policy and program requirements for the location of facilities, admissions standards, and vocational education opportunities for limited-English-speaking national minorities and for handicapped persons.

(continued)
What Topics Are Discussed in the Guidelines?

- **Section V: Counseling and Prevocational Programs** provides guidance for eliminating discriminatory counseling practices and promotional materials by providing students with equal opportunity in career selections.

- **Section VI: Equal Opportunity in the Vocational Education Instruction Setting** covers the accommodation of handicapped students in vocational education programs, the requirements of postsecondary residential housing, student financial assistance, and comparable facilities.

- **Section VII: Work Study, Cooperative Vocational Education, Job Placement, and Apprentice Training** discusses the employment of students in businesses and industries and the conditions for student participation in apprenticeship training programs.

- **Section VIII: Employment of Faculty and Staff** provides guidelines for the equal treatment of faculty and staff in recruitment practices, salaries, and advancement opportunities.

- **Section IX: Proprietary Vocational Education Schools** focuses on private schools that provide vocational education and that are subject to the Guidelines.
REQUIREMENTS FOR THE STATE AGENCY
(Questions 8-19)

A National Policy (Questions 8-12)

8. Is there a national policy?
9. What does the principle of nondiscrimination mean?
10. Where has unlawful discrimination been found?
11. What do the Guidelines prohibit?
12. What is required to eliminate unlawful discrimination?

SELECTED RESOURCES: A NATIONAL POLICY


Lee, Arthur M. *Use of Evaluative Data by Vocational Educators.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 546
Shannon, Thomas A. *The Role of Local School Boards in the Development and Direction of Programs of Occupational Education*. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 708

Stevens, David W. *The Coordination of Vocational Education Programs with CETA*. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 541


QUESTION 8

IS THERE A NATIONAL POLICY?

- Yes. The Guidelines state a national policy of nondiscrimination in vocational education programs and activities.

- This national policy can be stated as the "Principle of Nondiscrimination": Recipients of federal money cannot engage or participate in unlawful discrimination.

- This national policy of nondiscrimination in vocational education programs or activities is the law.

- The law mandates equality of educational opportunity for each applicant or student in vocational education.

NOTES

A national policy

"Principle of Nondiscrimination"

Equal opportunity is the law.

△ = Transparency/
QUESTION 9

WHAT DOES THE PRINCIPLE OF NONDISCRIMINATION MEAN?

- At the state level, the principle of nondiscrimination translates into an obligation upon state education agencies to identify, prevent, and remedy unlawful discrimination in vocational education programs.

NOTES

Identify, prevent, remedy discrimination ▲ 7

▲ = Transparency
WHERE HAS UNLAWFUL DISCRIMINATION BEEN FOUND?

- During 1973–78 compliance reviews, OCR staff found unlawful discrimination in vocational education programs in several areas.

  a. Eligibility requirements, such as residence within a geographic area or admissions tests, deny vocational education opportunities on the basis of race, color, national origin, or handicap.

  b. Handicapped students are unlawfully assigned to separate annexes or branches; they are also denied equal vocational education opportunities as a result of inaccessible facilities, inadequate facilities, and inadequate evaluation procedures.

  c. Vocational schools established for students of one race, national origin, or sex continue as essentially segregated facilities.

  d. National origin minorities with limited proficiency in English are denied equal opportunity to participate in vocational programs.

  e. Vocational education administrators often fail to adequately protect against discrimination in the placement of students with employers.

  f. Faculty and staff are assigned to vocational programs on the basis of race, national origin, sex, and handicap (Federal Register).

NOTES
QUESTION 11

WHAT DO THE GUIDELINES PROHIBIT?

- Vocational education administrators must not require, approve of, or engage in any unlawful discrimination on the basis of race, color, national origin, sex, or handicap in four principal areas: funding, policy, administration, and conducting programs.

- In the fiscal area, vocational education administrators must not devise funding criteria and formulas which discriminate in the distribution of vocational education funds to local agencies.

- In the policy area, vocational education administrators must not establish requirements for admission or for administration which discriminate.

- In the area of administration, vocational education administrators must not approve actions by local agencies which discriminate.

- In the area of conducting programs, vocational education administrators must not deny equal opportunity to applicants, students, or employees.

NOTES

22
QUESTION 12

WHAT IS REQUIRED TO ELIMINATE UNLAWFUL DISCRIMINATION?

- The significance of the national policy of nondiscrimination at the state level is in two major areas of program administration.

- First, administrators "that administer grants for vocational education must distribute federal, state, or local vocational funds so that no student or group of students is unlawfully denied an equal opportunity to benefit from vocational education on the basis of race, color, national origin, sex, or handicap" *(Federal Register).*

- Second, "the state agency responsible for the administration of vocational education programs must adopt a compliance program to prevent, identify, and remedy discrimination on the basis of race, color, national origin, sex, or handicap" by those who receive funds from the state agency *(Federal Register).*

- To eliminate discrimination in vocational education programs, administrators must distribute vocational education dollars equitably and must monitor those agencies which receive funds for compliance with civil rights legislation.

NOTES

Distribute funds without discrimination

Adopt a compliance program

Monitor receivers of funds
REQUIREMENTS FOR THE STATE AGENCY
(Questions 8-19)

Funding (Questions 13-16)

13. Are there funding constraints?
14. What type of funding is discriminatory?
15. What happens when discriminatory funding is found?
16. What other funding areas need consideration?

SELECTED RESOURCES: FUNDING


ARE THERE FUNDING CONSTRAINTS?

- Funding formulas and other methods of distributing or allocating vocational education dollars must not result in discrimination on the basis of race, color, national origin, sex, or handicap.

- Race, color, national origin, sex, or handicap can, however, influence allocation formulas provided that the factor of race, color, national origin, sex, or handicap is included "to compensate for past discrimination" (Federal Register) or to comply with the provisions of the Vocational Amendments of 1976 for these protected groups.

- The fact of "affirmative action funding" may serve to disprove unlawful discrimination in vocational education program dollar allocations.

NOTES
QUESTION 14

WHAT TYPE OF FUNDING IS DISCRIMINATORY?

- There is presumptive evidence of unlawful discrimination with respect to funding when a local receiver of funds enrolls a greater proportion of protected group students in its vocational education programs than the state-wide proportion of protected group students in vocational education, and yet receives a lower per-pupil ratio of funds than the state-wide per-pupil allocation.

NOTES
QUESTION 15

WHAT HAPPENS WHEN DISCRIMINATORY FUNDING IS FOUND?

- The Office for Civil Rights will require the state agency to adopt an alternative and nondiscriminatory method for distributing funds.
- The Office for Civil Rights may require affirmative action in future funding practices.
QUESTION 16

WHAT OTHER FUNDING AREAS NEED CONSIDERATION?

- There are two other areas of funding that administrators should assess for unlawful discrimination.

- The first area is the distribution of vocational education dollars through competitive grants or contracts. Criteria for awarding grants or contracts must be established and applied without regard to race, color, national origin, sex, or handicap.

- A second area is the distribution of funds by means of competitive or discretionary grants. Information and technical assistance for applying for these grants must be made available to all applicants.

NOTES
REQUIREMENTS FOR THE STATE AGENCY
(Questions 8-19)

Monitoring (Questions 17-19)

17. How does the state agency monitor recipients?
18. Does noncompliance mean funds stop?
19. Does the state agency have other obligations?

SELECTED RESOURCES: MONITORING


Hopkins, Charles O. Data Sources for Vocational Education Evaluation. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 548
QUESTION 17

HOW DOES THE STATE AGENCY MONITOR RECIPIENTS?

- The Guidelines state the requirement of the state agency to monitor receivers of vocational education dollars in terms of a compliance program.

- A compliance program must include:
  a. Collecting and analyzing data and information related to civil rights
  b. Conducting periodic reviews for civil rights compliance of selected local agencies or other receivers of vocational education dollars
  c. Providing technical assistance to local agencies and other receivers of vocational education dollars, upon request
  d. Periodically reporting monitoring activities and findings to the Office for Civil Rights

NOTES

△ 9

Compliance Program
a. Get data
b. Review agencies
c. Provide technical assistance
d. Report periodically

△ = Transparency
QUESTION 18

DOES NONCOMPLIANCE MEAN FUNDS STOP?

- No. The state agency is not required to stop or defer financial assistance to any local agency because of a finding of civil rights violations; nor is the state agency required to conduct hearings on allegations of discrimination.

- Findings of noncompliance, however, must be reported to the Office for Civil Rights by the state agency.

NOTES

Not required to terminate funds.
QUESTION 19

DOES THE STATE AGENCY HAVE OTHER OBLIGATIONS?

- Yes. The state agency is obligated to submit to the Office for Civil Rights the methods of administration (MOA) and related procedures it will follow to monitor receivers of vocational education dollars for compliance.

- The state agency is also obligated to submit an annual report of activities and findings to the Office for Civil Rights.

NOTES

Methods of administration (MOA)

Annual report
REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS  
(Questions 20-43)

Access to Facilities (Questions 20-28)

20. What topics do access and admissions include?
21. What restrictions are placed upon admissions policies?
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23. What restrictions affect the selection of sites?
24. What restrictions affect school boundaries?
25. What restrictions affect additions or renovations?
26. What must be done to remedy a discriminatory school location?
27. When is a vocational education center presumed to be unlawfully segregated?
28. How can segregated facilities be remedied?

SELECTED RESOURCES: ACCESS TO FACILITIES

Jernigan, Joan Shirley, and Clark, Donald L. Assisting Handicapped Students in Vocational Technical Programs in Community Colleges: Identification of Barriers; Recommendations for Removal of Barriers; Tasks to be Implemented. Final Report. Austin, TX: Texas A and M University, College Station, College of Education, 1978. ED 171 905


_Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance 45 C.F.R. 84 (1978)._ 

Tindall, Lloyd W., and Gugerty, John J. *Least Restrictive Alternative for Handicapped Students.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 533
QUESTION 20

WHAT TOPICS DO ACCESS AND ADMISSIONS INCLUDE?

Under the heading of access and admissions the Guidelines review several aspects of the vocational education enterprise in which unlawful discrimination is possible. In particular, the Guidelines note these areas:

a. Admissions policies
b. Location and accessibility of schools
c. Segregated facilities
d. Criteria for admission to programs
e. Equal access to courses and programs for minority or handicapped-students
f. Annual announcement of policy of nondiscrimination

NOTES
QUESTION 21

WHAT RESTRICTIONS ARE PLACED UPON ADMISSIONS POLICIES?

- The state or local agency cannot develop, impose, maintain, approve, or implement any admissions policy that unlawfully discriminates on the basis of race, color, national origin, sex, or handicap.

- State and local agencies can provide for equality of educational opportunity by developing admissions policies that do not use race, color, national origin, sex, or handicap as criteria to determine student eligibility to participate in programs, to use facilities, or to attend schools.

NOTES
QUESTION 22

HOW DOES LOCALE AFFECT EQUALITY OF EDUCATIONAL OPPORTUNITY?

- There are three aspects of school or facility location that bear upon providing equality of educational opportunity in vocational education. These aspects are:
  a. Accessibility to the school site
  b. Boundaries of the school district
  c. Additions or renovations to existing vocational education facilities
QUESTION 23

WHAT RESTRICTIONS AFFECT THE SELECTION OF SITES?

- School sites or locations for vocational education facilities may not be selected or approved by state or local agencies in order to exclude, segregate; or discriminate against students on the basis of race, color, national origin, sex, or handicap.

- The school site must not identify the facility or program as being for nonminority or minority students.

NOTES

Sites cannot exclude, segregate, or discriminate against students.

Readily accessible to all students.
QUESTION 24

WHAT RESTRICTIONS AFFECT SCHOOL BOUNDARIES?

- School boundaries may not be established, approved, or maintained in order to exclude students on the basis of race, color, or national origin.
QUESTION 25

WHAT RESTRICTIONS AFFECT ADDITIONS OR RENOVATIONS?

- Additions, modifications, or renovations of facilities cannot result in, maintain, or increase student segregation on the basis of race, color, national origin, sex, or handicap.

NOTES
QUESTION 26

WHAT MUST BE DONE TO REMEDY A DISCRIMINATORY SCHOOL LOCATION?

- The Office for Civil Rights requires the submission of a plan to remedy discrimination because of inaccessible sites, wrongly drawn school boundaries, or segregated facilities.

- This plan may include:
  a. Redrawing of boundaries to include areas unlawfully excluded and to exclude areas unlawfully included
  b. Transportation for students residing in areas unlawfully excluded
  c. Additional programs and services for students who would have been eligible for attendance at the school but for the discriminatory service area or site selection
  d. Reassignment of students
  e. Construction of new facilities or expansion of existing facilities (Federal Register).

NOTES

▲ 11

Remedies for segregated schools

▲ = Transparency
QUESTION 27

WHEN IS A VOCATIONAL EDUCATION CENTER PRESUMED TO BE UNLAWFULLY SEGREGATED?

- A vocational education school that enrolls mostly minority students or students of one race and that is open to all students within its boundaries is presumed unlawfully segregated:
  a. If it was established by a recipient for members of one race, national origin, or sex; or
  b. If it has been attended primarily by members of one race, national origin, or sex; or
  c. If most of its programs have traditionally been selected by members of one race, national origin, or sex.

NOTES
QUESTION 28

HOW CAN SEGREGATED FACILITIES BE REMEDIED?

- The following steps may be included in a plan to eliminate unlawfully segregated facilities:
  
a. Eliminate duplication of programs in nearby facilities.
  
b. Relocate or "cluster" programs or courses.
  
c. Add programs and courses that traditionally have been identified as intended for members of a particular race, national origin, or sex to schools that have traditionally served members of the other sex, or of a different race, or of a different national origin.
  
d. Merge programs into one facility.
  
e. Intensify protected group outreach, recruitment, and counseling.
  
f. Provide free transportation to students whose enrollment would promote desegregation.

NOTES

Remedies for segregated schools

▲ 12

▲ = Transparency
REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS
(Questions 20-43)

Access to Programs (Questions 29-32)

29. What criteria may not be used for admitting students?
30. How can administrators provide equal access to persons speaking limited English?
31. How can persons who speak limited English be identified?
32. How can administrators provide equal access to handicapped students?

SELECTED RESOURCES: ACCESS TO PROGRAMS


Evaluating

Hafen, Susan, and Degravy, Gwen. Resources for Disadvantaged Students. College Park, MD: University of Maryland, Maryland Vocational Curriculum Research and Development Center, 1979. ED 174 747


Hurwitz, A. Bilingual Vocational Instructor Training. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 607


50
QUESTION 29

WHAT CRITERIA MAY NOT BE USED FOR ADMITTING STUDENTS?

- The Guidelines prohibit the use of admissions criteria that have the effect of disproportionately excluding students on the basis of race, color, national origin, sex, or handicap.

- Criteria that have been used to exclude students include:
  a. Past academic performance
  b. Teachers' recommendations
  c. Disciplinary record
  d. Counselor's approval
  e. Interest inventories
  f. High school diploma
  g. Standardized tests (e.g., Test of Adult Basic Education, TABE)

- Admissions criteria like these can be used, however, and are nondiscriminatory:
  a. When validated as essential to participation in a specific program
  b. When "alternative equally valid criteria that do not have ... a disproportionate adverse effect are unavailable" (Federal Register)

NOTES
QUESTION 30

HOW CAN ADMINISTRATORS PROVIDE EQUAL ACCESS TO PERSONS SPEAKING LIMITED ENGLISH?

• Program administrators must identify students with limited English language skills.

• "LES" means limited-English-speaking persons.

• Program administrators must provide for the assessment of the ability of students with limited English language skills to participate in vocational education instruction.

• Program administrators must open all programs to students with limited English language skills.

• Admission to vocational education programs cannot be restricted because the applicant is a member of a national origin minority with limited English language skills.

NOTES
QUESTION 31

HOW CAN PERSONS WHO SPEAK LIMITED ENGLISH BE IDENTIFIED?

- Methods for identifying persons speaking limited English can include:
  a. Identification by administrative staff, teachers, or parents of secondary level students
  b. Identification by the student, if postsecondary
  c. Appropriate diagnostic procedures, if necessary

NOTES
QUESTION 32

HOW CAN ADMINISTRATORS PROVIDE EQUAL ACCESS TO HANDICAPPED STUDENTS?

- Administrators must provide for the elimination of architectural or equipment barriers to program access by handicapped students.

- To maintain access for handicapped students, administrators must provide related aids and services such as transportation or developmental, corrective, and other supportive services (e.g., counseling or school health services).

- To ensure access to vocational education programs or activities by postsecondary handicapped students, administrators must provide auxiliary aids such as taped texts, readers in libraries, or adapted classroom equipment.

- When necessary to secure access for handicapped persons to vocational education programs and activities, administrators must:
  a. Modify instructional equipment
  b. Modify or adapt the manner in which the courses are offered
  c. House the program in facilities that are readily accessible to mobility-impaired students
  d. Provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary handicapped students
  e. Provide related aids or services that ensure secondary students an appropriate education

- Administrators must ensure that handicapped persons are not denied access to vocational education programs because employment opportunities may be limited.
REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS (Questions 20-43)

Equal Educational Opportunity (Questions 33-39)

33. Must administrators announce a policy of nondiscrimination?
34. What points should this announcement contain?
35. What equal opportunity provisions are emphasized?
36. What accommodations must be provided for handicapped students?
37. How is student financial assistance restricted?
38. How is housing in residential postsecondary vocational education centers restricted?
39. To what extent must comparable facilities be provided?

SELECTED RESOURCES: EQUAL EDUCATIONAL OPPORTUNITY


55


Heddesheimer, Janet C. Vocational Education and Mid-Career Change. Columbus, OH: Thé Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 761


Steiger, JoAnn M., and Schlesinger, Sue H. Fostering Sex Fairness in Vocational Education: Strategies for Administrators. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 537


MUST ADMINISTRATORS ANNOUNCE A POLICY OF NONDISCRIMINATION?

- Administrators must publicize an announcement of nondiscrimination each year before school resumes.
- This announcement must be in native languages when the district has a fairly large minority community.
- This announcement should reach the general public, students, minority groups, women, and handicapped persons.
- This policy may be announced through local newspapers, TV or radio, agency publications, or other media.

NOTES

Announcement of nondiscrimination
△ 15
In native languages
Reach general public
Use variety of media

△ = Transparency
QUESTION 34

WHAT POINTS SHOULD THIS ANNOUNCEMENT CONTAIN?

- This announcement should contain:
  a. A brief summary of program offerings
  b. A brief summary of admissions criteria
  c. The name, address, and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity

NOTES

△ = Transparency
QUESTION 35

WHAT EQUAL OPPORTUNITY PROVISIONS ARE EMPHASIZED?

Several provisions of Title IX and Section 504 relating to equal opportunity for students in vocational education programs or activities are reemphasized in the Guidelines. These provisions include:

a. Accommodations for handicapped students
b. Financial assistance to students
c. Residential housing
d. Comparable facilities

NOTES
QUESTION 36

WHAT ACCOMMODATIONS MUST BE PROVIDED FOR HANDICAPPED STUDENTS?

- At the secondary level, handicapped students must be placed in the regular educational environment of any vocational education programs to the maximum extent appropriate to the needs of the student.

- When handicapped students cannot be placed in the regular classroom environment, state and local agencies must ensure that any separate facilities, programs, or services for handicapped students are comparable to those provided nonhandicapped students.

- State and local agencies must ensure that the needs of handicapped students are assessed and must determine the nature and extent of any supplementary aids that the handicapped student may require.

- State and local agencies must ensure that reasonable accommodations are made for handicapped students.

- Reasonable accommodations for handicapped students may include:
  - Making facilities readily accessible and usable
  - Modifying schedules
  - Acquiring or modifying equipment or devices
  - Providing readers or interpreters

- State and local agencies must provide safeguards for the education of handicapped students, including safeguards for evaluation, placement, and due-process proceedings.

\[\text{Regular education environment} \quad \Delta 17 \quad \diamond 2\]

\[\text{Comparable programs and facilities}\]

\[\text{Assessment of students}\]

\[\text{Reasonable accommodations}\]

\[\text{Other safeguards}\]

\[\Delta = \text{Transparency} \quad \diamond = \text{Handout}\]
QUESTION 37

HOW IS STUDENT FINANCIAL ASSISTANCE RESTRICTED?

- State and local agencies "may not award financial assistance... to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination" (Federal Register).

- "Student financial assistance" includes loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes.

- State and local agencies may administer "restricted financial assistance" for students (i.e., financial aid established by certain legal instruments, such as wills or trusts) if the overall effect of all financial assistance is nondiscriminatory.

- State and local agencies must ensure that financial aids information does not contain language or examples that are discriminatory.

- State and local agencies must ensure that financial aids information materials are in native languages when appropriate.

NOTES

- Nondiscrimination in financial assistance
- Examples of financial assistance
- "Restricted financial assistance"
- Publicize financial aid in native languages.
QUESTION 38

HOW IS HOUSING IN RESIDENTIAL POSTSECONDARY VOCATIONAL EDUCATION CENTERS RESTRICTED?

- When state and local agencies extend housing opportunities, they must do so without discrimination based on race, color, national origin, sex, or handicap.

- Both on-campus and off-campus housing opportunities must be available without discrimination.

- Residential housing for students of one sex or for handicapped students must be comparable as a whole to housing provided students of the other sex or nonhandicapped students.

- "Comparable as a whole" means proportionate in quantity, equal in quality, and at the same cost and under the same conditions.

NOTES

Nondiscrimination in housing

\(\Delta\) 18

On-campus and off-campus housing

Residential housing

Comparable housing

\(\Delta\) = Transparency
QUESTION 39

TO WHAT EXTENT MUST COMPARABLE FACILITIES BE PROVIDED?

- State and local agencies must ensure that "changing rooms, showers, and other facilities for students of one sex ... are comparable to those provided for students of the other sex" (Federal Register).

- Facilities "must be adapted or modified to the extent necessary to make the vocational education program readily accessible to handicapped persons" (Federal Register).

- Certain facilities may be separate because of sex, but separate facilities must be comparable.

NOTES

Comparable facilities for both sexes

Comparable facilities for handicapped

Separate facilities for both sexes
REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS
(Questions 20-43)

Student Employment (Questions 40-43)

40. What role do agencies have in equal work experience opportunity?
41. What responsibilities do agencies have for student employment opportunities?
42. Are agencies prohibited from entering into agreements with apprenticeship sponsors?
43. What are the key provisions of the sponsor’s assurance?

SELECTED RESOURCES: STUDENT EMPLOYMENT


Glover, Robert W. Apprenticeship in the United States: Implications for Vocational Education Research and Development. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 189 448


Schergens, Becky L. *The Parent's Role in Career Development: Implications for Vocational Education Research and Development*. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 707


QUESTION 40

WHAT ROLE DO AGENCIES HAVE IN EQUAL WORK EXPERIENCE OPPORTUNITY?

- The discussions of student employment and work experience in the Guidelines focus on two areas:
  
  a. Work-study, cooperative vocational education, and job placement programs
  b. Apprenticeship training

Equality of employment or work experience ▲ 19

△ = Transparency
QUESTION 41

WHAT RESPONSIBILITIES DO AGENCIES HAVE FOR STUDENT EMPLOYMENT OPPORTUNITIES?

- There are two chief responsibilities that state and local agencies exercise with respect to student employment opportunities.

- First, state and local agencies must ensure that they do not discriminate against students in making employment opportunities available.

- Second, state and local agencies must ensure that employers do not discriminate against students on the basis of race, color, national origin, sex, or handicap in:
  a. Recruitment
  b. Hiring
  c. Placement
  d. Assignment to work tasks
  e. Hours of employment
  f. Levels of responsibility
  g. Rates of pay

- The Guidelines prohibit a state or local agency from honoring "any employer's request for students who are free of handicaps or for students of a particular race, color, national origin, or sex" (Federal Register).
QUESTION 42

ARE AGENCIES PROHIBITED FROM ENTERING INTO AGREEMENTS WITH APPRENTICESHIP SPONSORS?

- The Guidelines do not prohibit state or local agencies from entering into agreements with sponsors of apprenticeship programs, but the Guidelines set forth qualifications on such agreements.

- The Guidelines prohibit agreements between state or local agencies and unions or sponsors of apprentice training programs if the labor union or sponsor discriminates against its members on the basis of race, color, national origin, sex, or handicap.

- Written agreements between state or local agencies and unions or sponsors of apprentice training programs must contain an assurance of nondiscrimination by the union or sponsor.

NOTES
QUESTION 43

WHAT ARE THE KEY PROVISIONS OF THE SPONSOR'S ASSURANCE?

- There are two main provisions that the assurance must contain:
  
a. A statement that the union or sponsor of apprenticeship training does not engage in discrimination against its members

b. A statement that the union or sponsor of apprenticeship training will offer and conduct its training free of discrimination

NOTES

Statement of nondiscrimination policy

Statement of nondiscrimination in fact
REQUIREMENTS FOR COUNSELORS
(Questions 44-48)

44. Which functions of counseling are discussed?
45. What responsibility do agencies have for counseling and prevocational programs?
46. What direction can agencies provide counselors?
47. What responsibility do agencies have for student recruitment activities?
48. What obligation do agencies have for promotional activities?

SELECTED RESOURCES: REQUIREMENTS FOR COUNSELORS


Charters, Margaret A. Vocational Education for Older Adults. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 187 847


Lennon, Thelma C. *Guidance Needs of Special Populations*. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 535

McKinney, Lorella A., and Seay, Donna M. *Development of Individualized Education Programs (IEPs) for the Handicapped in Vocational Education*. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 534


Vetter, Louise; Burkhardt, Carolyn; and Sechler, Judith. *Sex Equity Strategies*. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. 2nd Ed.


The components of counseling discussed in the Guidelines are:

- Counseling and prospects for success
- Student recruitment activities
- Counseling of students with limited-English-speaking ability or hearing impairments
- Promotional activities
QUESTION 45

WHAT RESPONSIBILITY DO AGENCIES HAVE FOR COUNSELING AND PREVOCATIONAL PROGRAMS?

- State and local agencies "must ensure that their counseling materials and activities, ... promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or handicap" (Federal Register).

- "Counseling activities" include student program selection and career or employment selection.

NOTES

♦ = Handout
QUESTION 46

WHAT DIRECTION CAN AGENCIES PROVIDE COUNSELORS?

- State and local agencies must "ensure that counselors do not direct or urge any student to enroll in a particular career or program" (Federal Register).

- State and local agencies must ensure that tests or other instruments that measure or predict a student's prospects for success in any career or program are not discriminatory with respect to race, color, national origin, sex, or handicap.

- State and local agencies must ensure that handicapped students are not directed toward more restrictive career or employment objectives than nonhandicapped students with similar interests and abilities.

- State and local agencies must ensure that any disproportional enrollment in vocational education programs is not the result of unlawful discrimination in counseling activities.

NOTES

= Handwritten

Student career or program selection

Equal opportunity to select by handicapped

♦ = Handwritten
QUESTION 47

WHAT RESPONSIBILITY DO AGENCIES HAVE FOR STUDENT RECRUITMENT ACTIVITIES?

- State and local agencies must conduct student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap.

- State and local agencies must ensure that counselors provide a broad range of occupational opportunities to students during presentations.

- For example, recruiting teams "should include persons of different races, national origins, sexes, and handicaps" (Federal Register).

NOTES
QUESTION 48

WHAT OBLIGATION DO AGENCIES HAVE FOR PROMOTIONAL ACTIVITIES?

- State and local agencies must distribute promotional literature in native languages when appropriate.

- Promotional efforts (including activities of school officials, counselors, and vocational staff) may not create or perpetuate stereotypes or other limitations based on race, color, national origin, sex, or handicap.

- "Promotional efforts" include career days, parents' night, shop demonstrations, visitations by groups of prospective students and by representatives from business and industry.

NOTES

Promotional literature in native languages

Eliminate stereotypes in recruiting

Definition of "promotional efforts"
MISCELLANEOUS
(Questions 49-51)

49. What obligation do agencies have to their faculty and staff?
50. Are proprietary vocational education schools covered?
51. Where can I get help with the Guidelines?

SELECTED RESOURCES: REQUIREMENTS FOR EMPLOYMENT PRACTICES


SELECTED RESOURCES: PROPRIETARY SCHOOLS


ED 186 712

SELECTED RESOURCES: WHERE TO GO FOR HELP

QUESTION 49

WHAT OBLIGATION DO AGENCIES HAVE TO THEIR FACULTY AND STAFF?

- The responsibility of state or local agencies with respect to the employment of faculty and staff spreads across recruitment, practices, salary policies, and employment opportunities for handicapped applicants.

- In general, state or local agencies cannot practice discrimination in hiring any employee or applicant based on race, color, national origin, sex, or handicap.

- State and local agencies must search out or recruit faculty and staff from a variety of schools, communities, or companies that are not disproportionately composed of persons of a particular race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination.

- State and local agencies must ensure that salary policies are based upon the conditions and responsibilities of employment.

- State and local agencies "must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question" (Federal Register).

- State and local agencies "must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty" (Federal Register).

- "State Advisory Councils of Vocational Education are recipients of federal financial assistance and therefore must comply with ... the Guidelines" with respect to program staffing (Federal Register).
QUESTION 50

ARE PROPRIETARY VOCATIONAL EDUCATION SCHOOLS COVERED?

- Proprietary schools that receive federal financial assistance are required to adhere to the provisions of the Guidelines.
- Proprietary schools are private (i.e., not public or nonprofit) vocational education institutions.
- Complaints against proprietary schools based on Title VI are under the jurisdiction of the Veterans Administration; complaints against proprietary schools based on Title IX and Section 504 are under the jurisdiction of the Office for Civil Rights.

NOTES
QUESTION 51

WHERE CAN I GET HELP WITH THE GUIDELINES?

- At the federal level, vocational education personnel can obtain assistance to implement the provisions of the Guidelines or answers to questions of compliance from the Office for Civil Rights in Washington, DC, or from the Department of Health and Human Services, Regional Offices for Civil Rights.

- At the state level, vocational education personnel can obtain assistance to implement the provisions of the Guidelines or answers to questions of compliance from their State Office of Civil Rights.

NOTES

♦ = Handout
LIST OF TRANSPARENCY MASTERS

1. Federal Register Title Page
2. Federal Legislation Prohibiting Discrimination: TITLE VI
6. Principle of Nondiscrimination
7. Chief State Agency Civil Rights Responsibility Areas
8. Funding Responsibility
9. Monitoring Responsibility: Compliance Program
10. Access and Admissions
11. Remedy for Access and Admissions
12. Remedy for Segregated Facilities
13. Remedy for Exclusion of National Origin Minority Students With Limited English Language Skills
14. Remedy for Exclusion of Handicapped Persons
15. Announcement Requirements
16. Annual Announcement of Policy of Nondiscrimination
17. Reasonable Accommodations
18. Equal Opportunity for Students
19. Student Work Experience
20. The Guidelines on Counseling
DEPARTMENT OF
HEALTH,
EDUCATION, AND
WELFARE

Office for Civil Rights

Office of the Secretary

VOCATIONAL EDUCATION
PROGRAMS
GUIDELINES FOR
ELIMINATING DISCRIMINATION
AND DENIAL OF SERVICES
ON THE BASIS OF RACE, COLOR,
NATIONAL ORIGIN, SEX AND
HANDICAP
FEDERAL LEGISLATION
PROHIBITING DISCRIMINATION:
TITLE VI

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964: "No person in the United States shall, on the ground of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."
FEDERAL LEGISLATION
PROHIBITING DISCRIMINATION:
TITLE IX

TITLE IX OF THE EDUCATION AMENDMENTS OF 1972: "No person . . . shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."
FEDERAL LEGISLATION PROHIBITING DISCRIMINATION:
SECTION 504

SECTION 504 OF THE REHABILITATION ACT OF 1973: "No otherwise qualified handicapped individual ... shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."
WHAT? WHO? WHY? WHEN?

WHAT?
OCR GUIDELINES

WHO?
VOCATIONAL EDUCATION PROGRAM PERSONNEL

WHY?
TO END DISCRIMINATION

WHEN?
EFFECTIVE NOW
PRINCIPLE OF NONDISCRIMINATION

Recipients of Federal funds for vocational education programs or activities cannot engage or participate in unlawful discrimination.
CHIEF STATE AGENCY
CIVIL RIGHTS RESPONSIBILITY AREAS

a. Funding: Equitable distribution of federal funds to provide equal educational opportunity.

FUNDING RESPONSIBILITY

a. Allocation formulas

b. Competitive grants or contracts

c. Discretionary grants

d. Awards
MONITORING RESPONSIBILITY: COMPLIANCE PROGRAM

a. Collect and analyze civil-rights-related data and information

b. Conduct periodic compliance reviews

c. Provide technical assistance

d. Report activities and findings to OCR
ACCESS AND ADMISSIONS

Admissions policy

School location and accessibility

Segregated facilities

Admissions criteria

Access for minority and handicapped

Annual announcement
REMEDY FOR ACCESS AND ADMISSIONS

a. Redraw school boundaries
b. Provide transportation
c. Increase program offerings
d. Reassign students
e. Construct new facilities
REMEDY FOR SEGREGATED FACILITIES

Eliminate duplication of programs

Relocate programs

Add nontraditional courses

Merge programs of several facilities

Use outreach, recruitment, and counseling

Provide free transportation
REMEDY FOR EXCLUSION OF
NATIONAL ORIGIN MINORITY STUDENTS
WITH LIMITED ENGLISH LANGUAGE SKILLS

a. Identify LES

b. Assess LES program participation skills

c. Open all programs to LES

d. Provide unrestricted program admission to LES
REMEDY FOR EXCLUSION
OF HANDICAPPED PERSONS

a. Modify instructional equipment

b. Modify or adapt programs

c. Provide courses in accessible facilities

d. Provide auxiliary aids

e. Provide related aids
ANNOUNCEMENT REQUIREMENTS

a. Announce yearly before school resumes

b. Place announcement in local papers, television, agency publication, etc.

c. Reach the general public

d. Use native languages
ANNUAL ANNOUNCEMENT OF
POLICY OF NONDISCRIMINATION

a. Brief summary or overview of program offerings

b. Brief summary or overview of admissions standards

c. Name, address, and telephone number of coordinator of
Title IX and Section 504 compliance activities
REASONABLE ACCOMMODATIONS

a. Making facilities readily accessible and usable

b. Modifying schedules

c. Acquiring or modifying equipment or devices

d. Providing readers or interpreters
EQUAL OPPORTUNITY FOR STUDENTS

a. Accommodations for handicapped students

b. Financial assistance to students

c. Residential housing

d. Comparable facilities
STUDENT WORK EXPERIENCE

a. Work study

b. Cooperative vocational education

c. Job placement programs

d. Apprentice training
THE GUIDELINES ON COUNSELING

a. Counseling and prospects for success

b. Student recruitment activities

c. Counseling of students with limited English-speaking ability or hearing impairments

d. Promotional activities
THE HANDICAPPED

- Remember that the handicapped are their own persons.

- Remember that each person who is handicapped is different, and no matter what label is attached for the convenience of others, is still a totally unique person.

- Remember that persons with handicaps are persons first and handicapped individuals second. These persons have the same right to self-actualization as any others.

- Remember that the handicapped have the same needs that you have: to love and be loved, to learn, to share, to grow and to experience, in the same world you live in. They have no separate world. There is only one world.

- Remember that the handicapped have the same right as you to fall, to fail, to suffer, to cry, to curse, to despair. To protect them from these experiences is to keep them from life.

- Remember that only those who are handicapped can show or tell you what is possible for them. We who serve them must be attentive, attuned observers.

- Remember that the handicapped must do for themselves. We can supply the alternatives, the possibilities, the necessary tools—but only they can put these things into action. We can only stand fast, be present to reinforce, encourage, hope and help, when we can.

- Remember that the handicapped, like ourselves, are entitled to life as they know it. They, too, must decide to live it fully in peace, joy and love, with what they are and what they have, or to sit back in apathy and await death.

- Remember that persons with handicaps, no matter how handicapped, have a limitless potential for becoming—not what we desire them to become, but what is within them to become.

- Remember that the handicapped must find their own manner of doing things. There are many ways of tying shoes, drinking from a glass, finding one's way to a bus stop. There are many ways of learning and adjusting. They must find the best way for them.

- Remember that the handicapped also need the world and others, in order to learn. All learning does not take place in the protected environment of the home or in a classroom, as many people believe. The world is a classroom. All of mankind are teachers. There is no meaningless experience.

- Remember that all persons with handicaps have a right to honesty about themselves, about you, and about their condition. To be dishonest with them is the most terrible disservice one can perform. Honesty forms the only solid base upon which all growth can take place.

STRATEGIES FOR COUNSELORS

• Present a wide range of program or career choices to all students.

• Avoid using minority status, sex, or handicapping conditions as measurements or indicators of student success in programs or activities.

• Provide students with a variety of information about programs and opportunities.

• Avoid restricting the career objectives of any individual.

• Offer the same kind of counseling and guidance to handicapped students as to nonhandicapped students.

• Present a wide array of program and career choices to handicapped students.

• Maintain respect for the occupational and career interests and aspirations of all students.

• Offer guidance, counseling, and support to all students interested in nontraditional careers or occupations.
SEX EQUITY STRATEGIES

- Inform yourself of the facts of women's employment.
- Confront your biases in formal training experiences and in informal discussions.
- Challenge the developers of counseling, career information, and testing materials to eliminate sex-stereotyping in their products.
- Learn about the developmental status of women clients, and work on basic problems of self-definition and motivation before providing career materials, testing, and career education experiences.
- Encourage females to enter basic courses in mathematics and science.
- Encourage women to keep their options open until they are ready to make choices.
- Develop and use support groups for women facing common problems.

STRATEGIES FOR COUNSELORS TO ASSIST THE HANDICAPPED

- Become familiar with guidelines, programs, and services for handicapped students.
- Emphasize the importance of individual differences and abilities.
- Modify methods, materials, and curricula in order to provide handicapped students with successful classroom experiences.
- Develop classroom experiences which are based on performance level as a means of evaluation.
- Integrate services and programming for handicapped students.
- Coordinate opportunities for handicapped students to become involved in appropriate vocational training and job placement.
- Develop classroom guidance activities.
- Select and administer batteries of tests dealing with interests and vocational potential.

Adapted from Lennon, Thelma C. *Guidance Needs of Special Populations.*
## CHECKLIST FOR EQUAL OPPORTUNITY

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1. Both sexes are encouraged to enter and to be admitted equally to all vocational education programs, activities, and facilities.
2. The curriculum offering in no way indicates that certain programs are only for boys, others only for girls.
3. The curriculum offerings meet a wide range of interests and abilities.
4. Minorities and handicapped persons of either sex are encouraged and actively recruited for programs.
5. Career choice materials offer a wide variety of options for both boys and girls, including minority and handicapped students.
6. Different sets of manners and behaviors are expected of male and female students in vocational programs.
7. Texts and illustrations show women and men performing the same or similar duties, and include minority or handicapped persons in the vocational education setting or in occupations or careers.
8. Staff development inservice programs have been conducted to develop sensitivities in counselors toward civil rights responsibilities.
9. There is an active recruitment program in those occupational areas that are not generally chosen by one sex.
10. Program content has been redesigned to appeal to students of both sexes.
11. Cooperative programs provide equal enrollment opportunities for both sexes, for minority group students, and for handicapped students.
12. Vocational education public relations materials are currently screened for sex bias, equal representation of males and females, of minority groups, and of handicapped persons.

CIVIL RIGHTS OFFICES

- Vocational education personnel can obtain assistance to implement the provisions of the Guidelines or answers to questions of compliance.

Federal Assistance

- THE OFFICE FOR CIVIL RIGHTS IN WASHINGTON, DC
  David Gerard
  Office of Standards, Policy, and Research
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Florida
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Knott Building
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Hawaii
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Equal Employment Opportunity/
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University of Hawaii, Bachman 122
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Honolulu, HI 96822
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Idaho
Donald Eshelby, Supervisor
Planning and Evaluation
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Boise, ID 83720
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Indiana
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(317) 232-2612

Maryland
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Program Accountability
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Archie Holmes, Manager
Equal Educational Opportunities
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Office of Civil Rights
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Lincoln, NE 68509
(402) 471-2441

New Hampshire
Victoria Richart, Consultant
Equal Education Opportunity
64 North Main Street
Concord, NH 03301
(603) 271-2130

New Mexico
Philip Felix
State Department of Education
Santa Fe, NM 87503
(505) 827-3151

New York
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Twin Towers, Room 1623
Albany, NY 12230
(518) 474-4686

North Dakota
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Assistant Director of Vocational Education
State Board for Vocational Education
900 East Boulevard Avenue
Bismarck, ND 58505
(701) 224-3101

Ohio
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Office of Civil Rights
Special Needs Service
65 South Front Street, Room 913
Division of Vocational Education
Columbus, OH 43215
(614) 466-4835

Oklahoma
William Rose, Director
Human Rights Commission
Jim Thorpe Building, Room G-11
Oklahoma City, OK 73105
(405) 521-2360

Oregon
Larry Mylnchuk, Specialist
Equal Education and Legal
State Department of Education
700 Pringle Parkway, SE
Salem, OR 97310
(503) 378-8532

Pennsylvania
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Harrisburg, PA 17126
(717) 783-9531

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Robert L. Bailey, IV
Affirmative Action Officer
State Department of Education
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Providence, RI 02908
(401) 277-2691

South Dakota
Pete Fallesen, Assistant Director
Division of Vocational Education
Richard F. Kneip Building
Pierre, SD 57501
(605) 773-4719

Tennessee
Troy Jones
Cordell Hull Building, Room 116
Nashville, TN 37219
(615) 741-3248

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Program Support Services
Département of Occupational Education
and Technology
Texas Education Agency
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Austin, TX 78701
(512) 475-3129
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Apprenticeship Placement and Office of Civil Rights
Utah State Office of Education
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Salt Lake City, UT 84111
(801) 533-5371

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Vocational-Technical Education Division
Vermont Department of Education
State Office Building
120 State Street
Montpelier, VT 05602
(802) 828-3101

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Office of Civil Rights
Department of Health, Education and Welfare
7th and D Streets, SW, ROB #3
Washington, DC 20202

Wyoming
Abel Benairdes, Special Needs Coordinator
State Department of Education
Hathaway Building
Cheyenne, WY 82002
(307) 777-7411

Puerto Rico
Attorney Eddie Salich, Executive Director
Office of Civil Rights
P.O. Box 1016
Hato Rey, PR 00919
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