Maryland Methods of Administration Program

Office of College and Career Pathways

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PRESENTED BY

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Presentation Outline

1. What is the Methods of Administration (MOA) Program?

2. Preparing for Compliance Visits

3. What is Belonging?

What is the Methods of Administration (MOA) Program?

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Overview of MOA

Maryland's MOA program ensures that all students, regardless of race, color, national origin, sex, or disability, have equal access to high-quality CTE programs. We do this by supporting the LEAs, community colleges, and state-operated facilities that participate in our state-approved CTE programs in:

- **Understanding students' rights, conducting targeted compliance reviews;**

- **Implementing corrective action when civil rights violations are found and**

- **Reporting civil rights activities and findings to the Office for Civil Rights of the U.S. Department of Education.**

Overview of MOA

- **The United States Department of Education's Office for Civil Rights** requires the Maryland State Department of Education, as the state agency responsible for administering Career and Technical Education (CTE), **to conduct a Civil Rights compliance program review**.

- The intent is **to identify, remedy,** and **prevent discrimination** in CTE programs operated by education agencies receiving federal financial assistance. **LEAs, community colleges, and state-operated facilities are selected for on-site review** according to CTE enrollment data, school demographics and location, established review cycle, requests for technical assistance, or procedural information.

- The **purpose of monitoring reviews** is to **comprehensively assess** the selected **local education agencies, community colleges, or state-operated facilities**, as well as all facilities housing CTE programs or used by CTE-enrolled students, **to ensure compliance with several federal Civil Rights authorities and regulations.**

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Terms to Know

Commonly used terms and references used throughout the MOA cycle.

- **Methods of Administration (MOA) Program** - Covers any LEA, community college, or state-operated agency that receives federal funds and offers a career technical education program of study.
- **Letters of Findings (LOF)** - A post-monitoring report sent to the chief LEA administrator (Superintendent) elevating any areas of non-compliance with Civil Rights law that needs to be addressed.
- **Office for Civil Rights (OCR)** - Located in the US Department of Education, which authorizes and monitors the MOA programs nationwide.
- **Voluntary Compliance Plan (VCP)** – Lists findings documented after an MOA review, and includes corrective actions to be remedied by the subrecipient and agreed mutually between OCCP and the chief LEA administrator
- **MOA State Plan** – Outlines the procedures and processes for the MSDE methods of administration reviews, including a glossary of terms and links to useful resources.

Legal and Regulatory Framework

The Maryland MOA plan is purposefully aligned to the **Maryland CTE Four-Year State Plan**, and the **Blueprint for Maryland's Future** to ensure a consistent approach to CTE programs statewide.

Federal law requires that all school districts receiving funding support from the U.S. Education Department, and providing CTE programs shall comply with:

- The Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
- Guidelines for the Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs (MOA Guidelines) (34 C.F.R. Part 100, Appendix B)
- Title VI of the Civil Rights Act of 1964 (34 C.F.R. Part 100)
- Title IX of the Education Amendments of 1972 (34 C.F.R. Part 106)
- Section 504 of the Rehabilitation Act of 1973 (34 C.F.R. Part 104)
- Title II of the Americans with Disabilities Act of 1990 (28 C.F.R. Part 35)
- The Individuals with Disabilities Education Act (IDEA), as amended, and the U.S. Department of Education's implementing regulations at 34 CFR Part 300 (P.L. 101-476;20 U.S.C. § 1400)

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The MOA Program Review

For the 2023-2024 school year, the criterion for the LEA MOA program review selection will be risk-based. The LEAs, community colleges, and state-operated facilities with the highest risk score will be selected for an on-site review. The risk assessment includes a formula that considers the following:

Access & Representation (CTE Disproportionate Enrollment & Performance)	Quality	Additional Criteria
• Gender • Disability • Minority • Economically Disadvantaged • English Learner • Homeless Status • Foster Status	• CTE Program Performance • CTE Program Integration • Time Since Last Review	LEAs, Community Colleges and state-operated facilities are also given an additional point per year since their last documented MOA visit.

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How the MOA Program Operates

MOA is a partnership between three different entities: OCR, SEAs (MSDE,) and LEAs (inclusive of community colleges and state-operated facilities.) Their roles are listed below:

OCR	**Office of Civil Rights**	• Delegates the authority to conduct compliance reviews of CTE local school systems. • Oversees the work of the SEA by reviewing biennial reports and providing technical assistance.
SEA	**State Education Agency**	• SEA formulates selection criteria to identify local school systems with persistent equity gaps. • Conducts broad civil rights compliance Methods of Administration reviews of local school systems.
LEA	**Local Education Agency**	• Receive federal funds for CTE programs. • Receive MOA review every five years. • Must comply with federal laws or remedy findings following MOA reviews.

Preparation for Compliance Visit

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MOA Compliance Team

In addition to the **MOA Coordinator**, the **MOA compliance team will consist of representatives from across MSDE** dependent on necessary support indicated through the selection process.

Teams may be comprised of members from:

- Division of Early Childhood
- Division of Early Intervention and Special Education Services
- Division of Student Support, Academic Enhancement and Educational Policy
- Office of College and Career Pathways
- Office of School Facilities
- Office of School Improvement and Transformation
- Office of Teaching and Learning Instructional Programs and Services
- Office of Educator Certification and Program Approval

Who Should Be At the Table

When **building your MOA team**, the following **stakeholders** should be involved in the process:

- CTE Director
- Career Counselors
- School Counselors
- Principal
- Special Education Coordinators
- CTE Teachers
- CTE Students
- CTE Parents

These stakeholders are essential to **providing a holistic** and **in-depth view** of **CTE programs** in your LEA.

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MOA Review Process

Date of Action	Action Needed	Responsible Party
60 Days Before Compliance Visit	Send a Letter of Selection to the recipient.	OCCP
30 Days Before Compliance Visit	Submit evidence through the voluntary compliance plan that demonstrates compliance with OCCP.	LEA, Community College, or State Operated Program
Day of Scheduled Compliance Visit	Facilitate Desk Audit or On-Site Review	OCCP
30 Days After Compliance Visit	Issue a Letter of Finding (LOF)*	OCCP
60 Days After Compliance Visit	Submit a finalized voluntary compliance plan to MSDE outlining actions that will be taken to address items in the LOF.	LEA, Community College, or State Operated Program
60 Days After Compliance Visit	Send Acceptance Letter or Revision Letter	OCCP

*LEAs, Community Colleges, and State-Operated facilities have two years from the date they receive their LOF to make the appropriate remedies.

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MOA Review Materials

The MOA Compliance Team is committed to ensuring LEAs, community colleges, and state-operated programs have the necessary tools and support to provide equitable access to career programs.

MOA Sample Review Materials:

- **MOA Desk Audit Toolkit -** is prepared for subrecipients before the MOA review to ensure all paperwork and/or evidence of compliance is verifiable.
- **MOA Letter of Finding-** is sent to the chief LEA administrator following an MOA review. This is a sample.
- **Voluntary MOA Compliance Plan-** shows a template of findings and plans for corrective action. This is a sample.
- **Standard Non-Discrimination Language -** is standard language that must be made publicly available and accessible within all LEAs. It is a common flag during audits.
- **Glossary of Terms -** contains a comprehensive list of terms used throughout the MOA process and other OCCP communications.

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Common Compliance Violations

One of the pictures below represents a common MOA violation. Can you spot it?

Fig.29(b)

Toilet paper dispensers shall be **installed within reach**, as shown in Fig. 29(b). **Dispensers that control delivery**, or that **do not permit continuous paper flow, shall not be used.** (**4.17.3**)

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Common Compliance Violations

One of the pictures below represents a common MOA violation. Can you spot it?

§502.6. Identification - **Parking space identification signs** shall **include the International Symbol of Accessibility** complying with 703.7.2.1.

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Common Compliance Violations

One of the pictures below represents a common MOA violation. Can you spot it?

505.1 General. **Handrails provided along walking surfaces** complying with 403, **required at ramps** complying with 405, and **required at stairs** complying with 504 shall comply with 505.

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What to Do Now to Prepare for an MOA Review

- Make sure the <u>Continuous Notice of Non-Discrimination</u> is on your LEA's website.

- Make sure **students and parents know** your **school's grievance procedures.**

- Make sure **all schools' common entrances and restrooms are in working order** and **accessible parking lot spaces have the proper signage** for disabled parking spaces.

- Check and **own your data to track patterns** concerning equity gaps.

What is DEIA?

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What Is Belonging?

- Our Belonging Program ensures that **everyone, regardless of background or identity, has equal opportunities to thrive in CTE programs.** This means proactively seeking out underrepresented students, providing them with the resources and support they need to succeed, and **creating inclusive learning environments where everyone feels welcome and valued.**

- OCCP's Belonging program supplements MOA by providing resources and technical assistance to LEAs, allowing them to **build practices into their school cultures that support underrepresented students**. By incorporating these practices, LEAs can significantly lower their risk factors for MOA compliance visits.

- Belonging resources include **topical 1-pagers, bi-monthly Chat & Chew sessions, and a yearly Impact report.**

Topical 1-Pagers

These 1-pagers offer research-based best practices to allow LEAs to address equity concerns.

- **Systemic Inequality** – Guidance on identifying and addressing inequality and inequity that appears systematically within an LEA.

- **Recruitment and Admissions** – Guidance on creating equitable recruitment and admissions policies and procedures.

- **Multilingual Learners** – Guidance on making CTE programs more inclusive for Multilingual Learners.

- **Students With Disabilities** – Guidance on ensuring accessible programs for students with disabilities.

- **Students Experiencing Homelessness** – Guidance on supporting students experiencing homelessness through their CTE journey.

- **LGBT+ Learners** - Guidance on making CTE programs inclusive to members of the LGBT+ community.

Chat & Chews and Impact Report

OCCP will host bi-monthly open meetings open to all interested LEAs and their MOA teams.

Topics will include:

- An overview and Q&A of the MOA process.

- An overview and Q&A of the DEIA program and resources provided.

- A deep dive into Special Populations protected under Civil Rights law

- A Peer-to-Peer support session where best practices can be shared and elevated

The 2024 Impact Report - OCCP will elevate the **great work happening around the state** by developing an annual report, the first of which will be made available in the summer of 2024. The 2024 **Impact Report will highlight and elevate best practices** gathered through MOA site visits, customer service calls, and Chat & Chews.

Questions