

Andy Beshear
Governor



Lt. Gov. Jacqueline Coleman
Secretary
Education and Workforce
Development Cabinet

Jason E. Glass, Ed.D.
Commissioner and Chief Learner

KENTUCKY DEPARTMENT OF EDUCATION
300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

November 5, 2020
To Whom It May Concern:

Enclosed is the Kentucky Department of Education's Methods of Administration (MOA) civil rights biennial report for the 2018-2019 and 2019-2020 school years. The Kentucky Department of Education is filing this report pursuant to the Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (MOA Guidelines) (Appendix B of the Title VI regulation and the Section 504 regulation, and Appendix A of the Title IX regulation).

Kentucky's MOA Coordinator reviewed selected secondary and postsecondary schools that provide career and technical education, securing corrective action when civil rights violations were found. This report includes the MOA Coordinator's schedule of time spent on civil rights activities and findings, new policy reviews, an updated list of our subrecipient universe, subrecipient ranking, Voluntary Compliance Plans (VCP's), and Letters of Findings (LOF's).

If you have any questions about the report or require any additional information, you may contact my office.

Mercy Osuala, MOA Coordinator
Kentucky Department of Education
Office of Finance and Operations
(502) 564-8137, extension 4331
Email at mercy.osuala@education.ky.gov

For the 2020 Biennial Report

Item 1: I have a word document with my time break down for the 2018-2019 school year and from the 2019-2020 school year.

Item 2: as of right now any policies I've seen have not been discriminatory, item 2 reflects that.

Item 3: An updated list of current subrecipients in the 2020 Biennial folder labeled current subrecipients universe Dec 2019

Item 4: Subrecipient ranking: there are 2018-2019 and 2019-2020 subrecipient ranking excel documents labeled for ATC, Secondary, and Post-Secondary in the 2020 Biennial Report folder. The ranking tab in the document has the subrecipients listed by total points. 2018 Target plan secondary and 2018 target plan explains the ranking system for the 2019-2020 school year. For the target plan for 2018-2019 school year. I don't have an electronic copy. I'll put the hard copy I have in the 2020 biennial folder on my desk

Item 5: Current open VCPs Lewis County, Powell County and Somerset Community College.

Item 6: There is a document in the 2020 biennial report folder titled item 6. It is filled out for every school I've visited to this point.

Item 7: a copy of every LOF titled by school in the 2020 biennial folder

Item 8: a copy of every VCP titled by school in the 2020 biennial folder

Item 1: Staff Resources
Biennial Report
2018-2019 2019-2020

Item 1: Staff Resources

I am the MOA Coordinator for Office of Career and Technical Education, state of Kentucky. I am the only staff person. I spend 100% of my time with this project (100 FTE) for each year of the reporting period.

2018-2019:

Year One of Biennial Report (I spend 100% of my time with MOA activities)

Estimate of Percentage Spent on MOA activities:

- 40% Conducting On-Site Visits
- 10% Writing Letters of Findings
- 15% Analyzing Data, Ranking Subrecipients based on Target Plan
- 15% Monitoring
- 10% Reviewing Voluntary Compliance Plans
- 5% Providing technical assistance
- 5% Other Duties (MOA annual training, biennial report, reviewing current laws, etc)

2019-2020:

Year Two of Biennial Report –

September 2019-December 9,2019 (MOA Coordinator spent 100% of their time with MOA activities.)

Estimate of Percentage Spent on MOA activities:

- 20% Conducting On-Site Visits
- 15% Writing Letters of Findings
- 30% Analyzing Data, Ranking Subrecipients based on Target Plan
- 15% Monitoring
- 10% Reviewing Voluntary Compliance Plans
- 5% Providing technical assistance
- 5% Other Duties (MOA annual training, biennial report, reviewing current laws, etc)

Item 2: New Policy Review
Biennial Report
2018-2019, 2019-2020

Item 2: New Policy Review

New state policies and procedures were reviewed, and none were found to be discriminatory.

Subrecipient Universe
 Kentucky Department of Education
 Target Plan
 For School Years 2019-2020, 2020-2021

Number Count	Subrecipient Universe	Date of Last Review
	<i>Secondary Subrecipients (Area Technology Centers - ATC's)</i>	
1	Barren County ATC	1991
2	Belfry ATC	1997
3	Bell County ATC	1997
4	Boone County ATC	2004
5	Breathitt County ATC	1997
6	Breckinridge County ATC	1996
7	Bullitt County ATC	2004
8	Butler County ATC	Unknown
9	Caldwell County ATC	1996
10	Campbell County ATC	2019
11	Carroll County ATC	1989
12	Casey County ATC	1993
13	Clark County ATC	2002
14	Clay County ATC	1998
15	Clinton County ATC	1993
16	Corbin ATC	1998
17	Floyd County ATC	1987
18	Fulton County ATC	1989
19	Garrard County ATC	2010
20	Green County ATC	1995
21	Greenup County ATC	2005
22	Harrison County ATC	1998
23	Hughes JonesHarrodsburg ATC	2009
24	Jackson County ATC	Unknown
25	Knott County ATC	1998
26	Knox County ATC	1996
27	Lake Cumberland ATC	2011
28	Lee County ATC	1992
29	Leslie County ATC	1999
30	Letcher County ATC	1998
31	Lincoln County ATC	2008
32	Logan County ATC	Unknown
33	Madison County ATC	2014
34	Marion County ATC	2012
35	Martin County ATC	2016
36	Mason County ATC	2015
37	Mayfield/Graves County ATC	1995
38	Meade County ATC	2008
39	Millard ATC	1995
40	Monroe County ATC	1999
41	Montgomery County ATC	1987
42	Morgan County ATC	1990
43	Murray/Calloway County ATC	1996
44	Nelson County ATC	2006
45	Ohio County ATC	1995
46	Paducah ATC	2013
47	Pulaski County ATC	2015
48	Rockcastle County ATC	Unknown
49	Russell ATC	1994

Subrecipient Universe
 Kentucky Department of Education
 Target Plan
 For School Years 2019-2020, 2020-2021

Number Count	Subrecipient Universe	<i>Date of Last Review</i>
	<i>Secondary School District Subrecipients</i>	
1	Adair County	2008
2	Allen County	unknown
3	Anderson County	unknown
4	Ashland Independent	2014
5	Augusta Independent	2008
6	Ballard County	2015
7	Barbourville Independent	unknown
8	Bardstown Independent	2002
9	Barren County	2016
10	Bath County	2014
11	Beechwood Independent	unknown
12	Bell County	2012
13	Bellevue Independent	unknown
14	Berea Independent	unknown
15	Boone County	2011
16	Bourbon County	unknown
17	Bowling Green Independent	2010
18	Boyd County	2018
19	Boyle County	2007
20	Bracken County	1995
21	Breathitt County	2004
22	Breckinridge County	unknown
23	Bullitt County	2016
24	Burgin Independent	unknown
25	Butler County	1995
26	Caldwell County	2010
27	Calloway County	unknown
28	Campbell County	1996
29	Campbellsville Independent	1994
30	Carlisle County	unknown
31	Carroll County	2015
32	Carter County	2019
33	Casey County	1996
34	Caverna Independent	unknown
35	Christian County	1997
36	Clark County	2016
37	Clay County	2003
38	Clinton County	unknown
39	Corbin Independent	2003
40	Covington Independent	2001
41	Crittenden County	unknown
42	Cumberland County	2010
43	Danville Independent	unknown
44	Daviess County	2010
45	Dawson Springs Independent	unknown
46	Dayton Independent	unknown
47	Edmonson County	1994
48	Elizabethtown Independent	1999
49	Elliott County	unknown

Subrecipient Universe
Kentucky Department of Education
Target Plan
For School Years 2019-2020, 2020-2021

Number Count	Subrecipient Universe	
50	Eminence Independent	unknown
51	Erlander-Elsmere Independent	unknown
52	Estill County	2008
53	Fairview Independent	unknown
54	Fayette County	2002
55	Fleming County	2014
56	Floyd County	2016
57	Fort Thomas Independent	unknown
58	Frankfort Independent	unknown
59	Franklin County	unknown
60	Fulton County	unknown
61	Fulton Independent	2006
62	Gallitin County	1995
63	Garrard County	2008
64	Glasgow Independent	2010
65	Grant County	unknown
66	Graves County	unknown
67	Grayson County	2019
68	Green County	unknown
69	Greenup county	1996
70	Hancock county	1996
71	Hardin county	2015
72	Harlan County	unknown
73	Harrison County	1995
74	Hart county	unknown
75	Hazard Independent	unknown
76	Henderson County	2015
77	Henry County	2006
78	Hickman County	unknown
79	Hopkins County	2000
80	Jackson County	1994
81	Jefferson County	2005
82	Jenkins Independent	unknown
83	Jessamine County	1997
84	Johnson County	unknown
85	Kenton County	2011
86	Kentucky School for the Deaf	unknown
87	Knott County	2016
88	Knox County	2016
89	Larue County	1999
90	Laurel County	unknown
91	Lawrence County	2004
92	Lee County	unknown
93	Letcher County	unknown
94	Lewis County	2019
95	Lincoln County	2013
96	Livingston County	2000
97	Logan County	unknown
98	Lyon County	unknown
99	Madison County	2013
100	Magoffin County	2019

Subrecipient Universe
 Kentucky Department of Education
 Target Plan
 For School Years 2019-2020, 2020-2021

Number Count	Subrecipient Universe	
101	Marion County	2007
102	Marshall County	unknown
103	Martin County	unknown
104	Mason County	2014
105	Mayfield Independent	unknown
106	McCracken County	2015
107	McCreary County	unknown
108	McLean County	1995
109	Meade County	unknown
110	Menifee County	unknown
111	Mercer county	2012
112	Metcalfe County	unknown
113	Middlesboro Independent	2003
114	Monroe County	2006
115	Montgomery County	unknown
116	Morgan County	unknown
117	Muhlenberg County	unknown
118	Murray Independent	unknown
119	Nelson County	2012
120	Newport Independent	2006
121	Nicholas County	unknown
122	Ohio County	unknown
123	Oldham County	2011
124	Owen County	unknown
125	Owenboro Independent	2000
126	Owsley County	unknown
127	Paducah Independent	1997
128	Paintsville Independent	unknown
129	Paris Independent	2002
130	Pendleton County	unknown
131	Perry County	2016
132	Pike County	2009
133	Pikeville Independent	unknown
134	Powell County	2019
135	Pulaski County	2002
136	Raceland Independent	unknown
137	Robertson County	unknown
138	Rockcastle County	2013
139	Rowan County	2009
140	Russell County	unknown
141	Russell Independent	unknown
142	Russellville Independent	1999
143	Scott County	2007
144	Shelby County	2006
145	Simpson County	2005
146	Somerset Independent	2003
147	Spencer County	2011
148	Taylor County	2013
149	Todd County	1998
150	Trigg County	1997
151	Trimble County	2006

Subrecipient Universe
 Kentucky Department of Education
 Target Plan
 For School Years 2019-2020, 2020-2021

Number Count	Subrecipient Universe	
152	Union County	unknown
153	Walton-Verona Independent	unknown
154	Warren County	2006
155	Washington County	2002
156	Wayne County	unknown
157	Webster County	unknown
158	Whitley County	2003
159	Williamsburg Independent	unknown
160	Williamstown Independent	unknown
161	Wolfe County	unknown
162	Woodford County	2012
	Footnote:	
Total Subrecipient Universe		
Other Subrecipients/PostSecondary (Universities (4), Kentucky Community and Technical Colleges System (KCTCS) (16), and KCTCS - Correctional Facilities (9)		29
Secondary Subrecipients (Area Technology Centers)		53
Secondary School Districts (162)		162
Grand Total Subrecipient Universe		244

School Year	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes
<u>Total Possible Value</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>70</u>	
Lewis County	10	0	0	1	7	8	10	36	1
Boyd County	10	0	0	1	6	7	10	34	2
Carter County	10	0	0	0	4	10	10	34	3
Grayson County	10	0	0	1	5	8	9	33	4
Powell County *	10	0	0	1	6	7	9	33	5
Magoffin County	10	0	0	0	6	10	7	33	
Whitley County	10	0	0	1	5	10	7	33	
Johnson County	10	0	0	0	5	7	10	32	
Breathitt County	10	0	0	1	8	10	3	32	
Muhlenberg County	10	0	0	1	7	4	10	32	
Clay County	10	0	0	1	7	7	7	32	
Casey County*	10	0	0	0	4	8	10	32	
Lawrence County	10	0	0	1	4	7	9	31	
Pulaski County	10	0	0	1	5	5	10	31	
Marshall County	10	0	0	0	4	7	10	31	
Laurel County	10	0	0	1	4	6	10	31	
McCreary County	10	0	0	0	5	9	7	31	
Adair County	10	0	0	1	6	5	9	31	
Elliott County	10	0	0	0	6	10	5	31	
Pike County	9	0	0	0	3	9	10	31	
Hancock county	10	0	0	0	6	6	9	31	
Crittenden County	10	0	0	1	5	7	7	30	

School Year	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes
Allen County	10	0	0	0	5	5	10	30	
Boyle County	10	0	0	1	5	5	9	30	
Hopkins County	10	0	0	0	7	3	10	30	
Menifee County	10	0	0	1	8	8	3	30	
Rockcastle County	5	0	0	1	8	9	7	30	
Estill County	10	0	0	1	3	10	5	29	
Martin County	10	0	0	1	5	10	3	29	
Wayne County	10	0	0	1	5	4	9	29	
Morgan County	10	0	0	1	3	10	5	29	
Owen County	10	0	0	1	5	6	7	29	
Metcalfe County	10	1	0	0	7	6	5	29	
Grant County	10	0	0	0	4	4	10	28	
Campbell County	10	0	0	0	4	5	9	28	
Christian County	10	0	0	1	6	1	10	28	
Graves County	10	0	0	0	6	2	10	28	
Ohio County	10	0	0	0	7	2	9	28	
Oldham County	9	0	0	0	7	2	10	28	
Perry County	2	0	0	1	6	9	10	28	
Scott County	10	0	0	1	5	2	10	28	
Monroe County	10	0	0	1	6	8	3	28	
Corbin Independent	10	0	0	0	2	7	9	28	
Lyon County	10	0	0	0	8	3	7	28	
Jackson County	10	0	0	1	1	10	5	27	

School Year	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes
Jessamine County	10	0	0	0	6	1	10	27	
Montgomery County	10	0	0	1	4	3	9	27	
Pikeville Independent	10	2	0	1	10	3	1	27	
Shelby County	10	0	0	0	6	1	10	27	
Simpson County	10	0	0	1	5	1	10	27	
Hickman County	10	0	1	1	6	6	3	27	
Wolfe County	10	0	0	1	1	10	5	27	
Rowan County	9	0	0	0	5	4	9	27	
Frankfort Independent	10	0	0	0	9	3	5	27	
Bracken County	10	0	0	1	3	8	5	27	
Floyd County	2	0	0	1	5	10	9	27	
Augusta Independent	10	0	0	1	5	10	1	27	
Ashland Independent	4	0	0	1	8	3	10	26	
Henry County	10	0	0	0	6	3	7	26	
Boone County	7	0	0	0	5	4	10	26	
Covington Independent	10	0	0	1	5	0	10	26	
Fort Thomas Independent	10	0	0	0	5	6	5	26	
Gallatin County	10	0	0	1	5	3	7	26	
Owsley County	10	0	0	0	3	10	3	26	
Livingston County	10	0	0	0	3	6	7	26	
Franklin County	10	0	0	0	5	1	10	26	
Raceland Independent	10	0	0	0	5	8	3	26	
Murray Independent	10	0	1	0	5	2	7	25	

School Year	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes
Bowling Green Independent	8	0	0	0	7	1	9	25	
Daviess County	9	0	0	0	4	2	10	25	
Jefferson County	10	0	0	0	4	1	10	25	
Madison County	5	0	0	0	5	5	10	25	
Pendleton County	10	0	0	0	3	5	7	25	
Todd County	10	0	0	1	5	2	7	25	
Trimble County	10	0	0	0	1	9	5	25	
McLean County	10	0	0	0	4	6	5	25	
Meade County	10	0	0	0	4	2	9	25	
Clinton County	10	0	0	0	5	7	3	25	
Hart county	10	0	0	1	3	6	5	25	
Taylor County	5	0	0	0	4	6	10	25	
Bardstown Independent	10	0	0	0	7	3	5	25	
Knox County	2	0	0	1	4	8	10	25	
Fleming County	4	0	0	0	6	5	9	24	
Elizabethtown Independent	10	0	0	0	3	2	9	24	
Fayette County	10	0	0	0	3	1	10	24	
Spencer County	7	0	0	1	5	1	10	24	
Washington County	10	0	0	1	4	2	7	24	
Webster County	10	0	0	1	7	1	5	24	
Bullitt County	2	0	0	0	7	5	10	24	
Garrard County	10	0	0	0	4	3	7	24	
Letcher County	10	0	0	1	2	8	3	24	

<u>School Year</u>	<u>Prior On-Site Visits</u>	<u>Male/female enrollment by institution</u>	<u>Minorities enrolled by institution</u>	<u>Disability enrollment by institution</u>	<u>Male/Female enrollment by institution, by program</u>	<u>Minority enrolled by institution, by programs</u>	<u>Number of CTE programs</u>	<u>Total Points</u>	<u>Notes</u>
Lee County	10	0	0	1	4	6	3	24	
Edmonson County	10	0	0	0	3	6	5	24	
Bell County	6	0	0	0	6	8	3	23	
Beechwood Independent	10	0	0	0	6	4	3	23	
Jenkins Independent	10	0	0	2	5	5	1	23	
Newport Independent	10	0	0	1	3	0	9	23	
Trigg County	10	0	0	0	3	0	10	23	
Warren County	10	0	0	0	2	1	10	23	

School	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes
<u>Total Possible Value</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>70</u>	
Campbell County ATC	10	2	1	0	10	8	10	41	1
Morgan County ATC	10	0	0	1	9	10	9	39	
Belfry ATC	10	0	0	1	10	9	5	35	
Boone County ATC	10	1	1	0	9	7	7	35	
Breathitt County ATC	10	0	0	1	8	9	7	35	
Floyd County ATC	10	0	0	0	10	10	5	35	
Letcher County ATC	10	0	0	1	9	8	7	35	
Lincoln County ATC	10	1	0	0	10	7	7	35	
Breckinridge County ATC	10	0	0	0	8	6	10	34	
Bullitt County ATC	10	0	0	0	9	6	9	34	
Casey County ATC	10	0	0	1	9	7	7	34	
Corbin ATC	10	0	0	0	6	9	9	34	
Greenup County ATC	10	0	0	1	6	10	7	34	
Jackson County ATC	10	0	0	0	9	10	5	34	
Leslie County ATC	10	0	0	0	9	8	7	34	
Montgomery County ATC	10	0	0	1	7	7	9	34	
Clay County ATC	10	0	0	0	9	9	5	33	
Harrison County ATC	10	0	0	0	9	4	10	33	
Knox County ATC	10	0	0	0	9	9	5	33	
Lake Cumberland ATC	7	0	0	0	8	8	10	33	
Lee County ATC	10	0	0	0	8	8	7	33	
Millard ATC	10	0	0	0	8	10	5	33	

School	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes
Wayne County ATC	10	0	0	0	8	6	9	33	
Bell County ATC	10	0	0	0	8	9	5	32	
Clinton County ATC	10	0	0	0	8	5	9	32	
Ohio County ATC	10	1	0	0	8	6	7	32	
Rockcastle County ATC	10	0	0	0	5	10	7	32	
Warren County ATC	10	2	0	0	9	2	9	32	
Barren Co	10	0	0	0	7	4	10	31	
Monroe County ATC	10	0	0	1	8	3	9	31	
Butler County ATC	10	0	0	1	10	4	5	30	
Caldwell County ATC	10	0	0	0	10	3	7	30	
Carroll County ATC	10	0	0	0	7	3	10	30	
Knott County ATC-	10	0	0	0	5	10	5	30	
Marion County ATC	6	0	0	1	9	4	10	30	
Clark County ATC	10	0	0	1	10	1	7	29	
Green County ATC	10	0	0	0	8	4	7	29	
Harrodsburg ATC	9	0	0	0	9	4	7	29	
Nelson County ATC	10	0	0	0	10	2	7	29	
Meade County ATC	10	0	0	0	8	1	9	28	
Logan County CTC	10	0	0	0	7	1	9	27	
Martin County ATC	2	0	0	0	8	10	7	27	
Mason County ATC	3	1	1	0	10	7	5	27	
Russell ATC	10	0	0	1	8	3	5	27	
Shelby County ATC	10	0	0	0	8	2	7	27	

School	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Note:	Tie breaker(last visit)
<i>Total Possible Value</i>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>70</u>		
Hazard Community and Technical Co	8	0	0	0	7	8	10	33	1	2010
Hopkinsville Community College	10	0	3	0	8	2	10	33	2	1996
Somerset Community College	10	0	0	1	7	5	10	33	3	1994
Ashland Community and Tech. Colleg	10	0	0	0	7	5	10	32		
Southcentral Ky Community and Tec	10	0	0	0	9	3	10	32		
Elizabethtown Community and Tchr	10	0	0	1	7	3	10	31		
Owensboro Community and Technica	10	0	0	0	8	3	10	31		
West Kentucky Community and Tech	10	0	1	0	7	3	10	31		
Southeast Ky Community and Tech C	10	0	0	0	7	3	10	30		
Big Sandy Community and Tech. Coll	7	0	0	0	8	4	10	29		
Gateway Community and Technical C	10	0	0	0	7	2	10	29		
Henderson Community College	10	0	0	0	8	1	10	29		
Madisonville Community College	9	0	0	1	7	2	10	29		
Bluegrass Community and Technical	10	0	0	0	7	1	10	28		
Jefferson Community and Technical	9	0	0	0	7	2	10	28		
Maysville Community and Technical	2	0	0	0	8	5	10	25		
Eastern Kentucky University	10	0	1	0	8	0	3	22		
Ky Luther Luckett Correctional Fac	10	5	1	0	5	0	1	22		
West KY Correctional Complex	10	5	0	0	5	0	1	21		
Western Kentucky University	2	0	0	0	8	3	7	20		
Morehead State University	3	2	0	0	10	3	1	19		

School	Prior	Male/female	Minorities	Disability	Male/Female	Minority	Total	Notes
	On-Site Visits	enrollment by institution	enrolled by institution	enrollment by institution	enrollment by institution, by program	enrolled by institution, by programs		
Total Possible Value	10	10	10	10	10	10	60	Tie Breaker
Martin County	10	1	0	0	7	10	28	Unknown 1
McLean County	10	1	1	0	8	8	28	1995 2
Augusta Independent	10	1	0	1	5	10	27	2008 5
Jackson County	10	1	0	1	6	9	27	1994 3
Magoffin County	10	0	0	1	6	10	27	2004 4
Hancock county	10	0	1	0	7	8	26	
Letcher County	10	1	0	0	5	10	26	
Metcalfe County	10	2	0	0	7	7	26	
Clay County	10	0	0	0	6	9	25	
Fort Thomas Independent	10	1	0	0	8	6	25	
Harlan County	10	1	0	1	4	9	25	
Barbourville Independent	10	1	0	0	3	10	24	
Berea Independent	10	2	1	0	3	8	24	
Breathitt County	10	0	0	0	4	10	24	
Elliott County	10	0	0	0	4	10	24	
Fulton County	10	0	4	0	0	10	24	
Johnson County	10	0	0	0	5	9	24	
Lawrence County	10	0	0	0	5	9	24	
McCreary County	10	1	0	0	6	7	24	
Rockcastle County	6	0	0	0	8	10	24	
Wolfe County	10	0	0	0	4	10	24	
Danville Independent	10	0	1	0	8	4	23	
Greenup county	10	0	0	0	4	9	23	

Lee County	10	1	0	0	0	2	10	<u>23</u>
Lyon County	10	1	0	0	0	6	6	<u>23</u>
Monroe County	10	2	0	0	0	3	8	<u>23</u>
Ohio County	10	2	0	0	0	6	5	<u>23</u>
Pikeville Independent	10	3	0	0	0	7	3	<u>23</u>
Dawson Springs Independent	10	1	0	1	0	0	10	<u>22</u>
Edmonson County	10	0	0	0	0	4	8	<u>22</u>
Estill County	10	0	0	0	0	3	9	<u>22</u>
Fairview Independent	10	1	0	1	0	0	10	<u>22</u>
Owen County	10	1	0	0	0	5	6	<u>22</u>
Russell Independent	10	1	0	1	0	0	10	<u>22</u>
Boyle County	10	0	0	1	1	6	4	<u>21</u>
Crittenden County	10	0	0	0	0	4	7	<u>21</u>
Jenkins Independent	10	0	0	1	1	2	8	<u>21</u>
Menifee County	10	0	1	0	0	0	10	<u>21</u>
Paintsville Independent	10	1	0	0	0	0	10	<u>21</u>
Pendleton County	10	0	0	0	0	4	7	<u>21</u>
Trimble County	10	1	0	0	0	3	7	<u>21</u>
Union County	10	1	0	0	0	7	3	<u>21</u>
Whitley County	10	0	0	0	0	2	9	<u>21</u>
Bardstown Independent	10	1	0	0	0	7	2	<u>20</u>
Burgin Independent	10	1	0	0	0	3	6	<u>20</u>
Green County	10	1	0	0	0	4	5	<u>20</u>
Harrison County	10	1	0	0	0	3	6	<u>20</u>
Middlesboro Independent	10	0	0	0	0	4	6	<u>20</u>
Owsley County	10	0	0	0	0	2	8	<u>20</u>
Pike County	10	0	0	0	0	2	8	<u>20</u>
Wayne County	10	1	0	0	0	4	5	<u>20</u>
Williamstown Independent	10	0	0	0	0	0	10	<u>20</u>
Anderson County	10	0	0	0	0	6	3	<u>19</u>

Bracken County	10	0	0	0	1	8	<u>19</u>
Hopkins County	10	0	0	0	6	3	<u>19</u>
Livingston County	10	0	0	0	4	5	<u>19</u>
Muhlenberg County	10	0	0	0	5	4	<u>19</u>
Nicholas County	10	1	0	0	3	5	<u>19</u>
Rowan County	10	0	0	0	5	4	<u>19</u>
Simpson County	10	0	0	0	6	3	<u>19</u>
Webster County	10	1	0	0	5	3	<u>19</u>
Williamsburg Independent	10	1	0	0	2	6	<u>19</u>
Allen County	10	0	0	0	5	3	<u>18</u>
Bell County	7	0	0	1	0	10	<u>18</u>
Bowling Green Independent	9	1	1	0	6	1	<u>18</u>
Casey County	10	0	0	0	3	5	<u>18</u>
Corbin Independent	10	0	0	0	1	7	<u>18</u>
Frankfort Independent	10	0	0	0	8	0	<u>18</u>
Hart county	10	0	0	0	4	4	<u>18</u>
Henry County	10	0	0	0	5	3	<u>18</u>
Knox County	3	0	0	0	8	7	<u>18</u>
Laurel County	10	0	0	0	2	6	<u>18</u>
Marshall County	4	0	0	0	5	9	<u>18</u>
Pulaski County	10	0	0	0	4	4	<u>18</u>
Spencer County	8	1	0	1	6	2	<u>18</u>
Ashland Independent	5	0	1	0	6	5	<u>17</u>
Campbell County	10	0	0	0	4	3	<u>17</u>
Christian County	10	1	0	0	5	1	<u>17</u>
Gallatin County	10	0	0	0	3	4	<u>17</u>
Grant County	10	0	0	0	4	3	<u>17</u>
Graves County	10	0	0	0	5	2	<u>17</u>
Kentucky School for the Deaf	10	0	0	1	2	4	<u>17</u>
Larue County	10	1	0	0	3	3	<u>17</u>

Madison County	6	1	1	0	4	5	<u>17</u>
Meade County	10	1	0	0	4	2	<u>17</u>
Mercer county	7	2	0	1	5	2	<u>17</u>
Paducah Independent	10	1	0	0	6	0	<u>17</u>
Russell County	10	0	0	0	3	4	<u>17</u>
Shelby County	10	0	0	0	6	1	<u>17</u>
Taylor County	6	0	0	0	6	5	<u>17</u>
Bath County	5	0	0	0	4	7	<u>16</u>
Caldwell County	9	1	0	0	2	4	<u>16</u>
Carlisle County	10	0	0	0	3	3	<u>16</u>
Cumberland County	9	1	0	0	4	2	<u>16</u>
Daviess County	9	0	0	0	4	3	<u>16</u>
Dayton Independent	10	1	0	0	0	5	<u>16</u>
Floyd County	3	0	0	0	4	9	<u>16</u>
Franklin County	10	0	0	0	5	1	<u>16</u>
Hazard Independent	10	0	0	0	3	3	<u>16</u>
Hickman County	10	1	1	1	3	0	<u>16</u>
Jefferson County	10	1	0	0	4	1	<u>16</u>
Jessamine County	10	0	0	0	5	1	<u>16</u>
Lewis County	0	1	0	0	6	9	<u>16</u>
Logan County	10	1	0	0	1	4	<u>16</u>
Oldham County	8	1	0	0	7	0	<u>16</u>
Paris Independent	10	1	0	0	5	0	<u>16</u>
Perry County	3	1	0	0	4	8	<u>16</u>
Robertson County	10	0	0	0	2	4	<u>16</u>
Walton-Verona Independent	10	0	0	0	0	6	<u>16</u>
Washington County	10	0	1	0	2	3	<u>16</u>
Boyd County	1	0	0	0	6	8	<u>15</u>
Butler County	10	1	0	0	2	2	<u>15</u>
Covington Independent	10	0	0	0	5	0	<u>15</u>

Elizabethtown Independent	10	0	0	0	0	4	1	15
Fleming County	5	0	0	0	0	4	6	15
Kenton County	8	1	0	0	0	2	4	15
Marion County	10	0	0	0	0	3	2	15
Mayfield Independent	10	1	1	0	0	3	0	15
Montgomery County	10	0	0	0	0	5	0	15
Murray Independent	10	0	0	0	0	3	2	15
Owenboro Independent	10	0	1	0	0	4	0	15
Powell County	0	0	0	0	0	7	8	15
Raceland Independent	10	0	0	0	0	0	5	15
Somerset Independent	10	1	0	0	0	3	1	15
Trigg County	10	0	0	0	0	5	0	15
Beechwood Independent	10	1	0	0	0	3	0	14
Boone County	8	0	0	0	0	4	2	14
Bourbon County	10	1	0	1	1	2	0	14
Breckinridge County	10	1	0	1	1	0	2	14
Clark County	3	1	1	0	0	6	3	14
Clinton County	10	0	0	0	0	4	0	14
Garrard County	10	1	0	0	0	3	0	14
Scott County	10	0	0	0	0	3	1	14
Todd County	10	0	0	0	0	4	0	14
Warren County	10	0	0	0	0	3	1	14
Ballard County	4	1	0	0	0	5	3	13
Bellevue Independent	10	2	0	1	1	0	0	13
Calloway County	10	0	0	0	0	1	2	13
Carrroll County	4	0	0	1	1	5	3	13
Russellville Independent	10	0	0	0	0	3	0	13
Campbellville Independent	10	1	1	0	0	0	0	12
Carter County	0	0	0	0	0	3	9	12
Caverna Independent	10	2	0	0	0	0	0	12

Erlanger-Elsmere Independent	10	1	1	0	0	0	0	0	12
Fulton Independent	10	1	1	0	0	0	0	0	12
Glasgow Independent	9	0	0	0	3	0	0	0	12
Knott County	3	0	0	0	3	0	6	0	12
Lincoln County	6	1	0	0	3	0	2	0	12
Morgan County	10	0	0	0	2	0	0	0	12
Nelson County	7	0	0	0	2	0	3	0	12
Newport Independent	10	0	0	0	2	0	0	0	12
Woodford County	7	0	0	0	4	0	1	0	12
Adair County	3	1	0	0	4	0	3	0	11
Barren County	3	0	0	0	4	0	4	0	11
Bullitt County	3	0	0	0	4	0	4	0	11
Grayson County	0	0	0	0	5	0	6	0	11
Eminence Independent	10	0	0	0	0	0	0	0	10
Hardin county	4	0	0	0	5	0	1	0	10
Henderson County	4	0	0	0	6	0	0	0	10
McCracken County	4	0	0	0	4	0	1	0	9
Mason County	5	0	0	0	3	0	0	0	8
Fayette County	1	1	0	0	3	0	0	0	5

School	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes	Tie Breaker
Total Possible Value	10	10	10	10	10	10	10	70		
Jackson County ATC	10	2	0	1	10	10	5	38	1	unknown
Millard ATC	10	2	0	1	9	9	7	38	2	1995
Bullitt County ATC	10	1	0	0	10	6	10	37		
Knott County ATC-	10	2	0	1	9	10	5	37		
Letcher County ATC	10	2	0	0	9	9	7	37		
Belfry ATC	10	1	0	0	10	10	5	36		
Lee County ATC	10	0	0	0	9	10	7	36		
Leslie County ATC	10	1	0	0	8	10	7	36		
Knox County ATC	10	1	0	1	9	9	5	35		
Monroe County ATC	10	2	1	1	9	3	9	35		
Morgan County ATC	10	1	0	0	9	8	7	35		
Harrison County ATC	10	1	1	0	8	4	10	34		
Lake Cumberland ATC	8	1	0	0	8	7	10	34		
Nelson County ATC	10	2	1	0	10	2	9	34		
Boone County ATC	10	2	0	0	10	6	5	33		
Breathitt County ATC	10	0	0	1	7	8	7	33		
Breckinridge County AT	10	1	0	0	7	6	9	33		
Clinton County ATC	10	1	0	0	8	5	9	33		
Corbin ATC	10	1	0	0	6	7	9	33		
Greenup County ATC	10	1	0	0	6	9	7	33		
Lincoln County ATC	10	2	1	1	9	3	7	33		
Russell ATC	10	2	0	0	8	8	5	33		

School	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes	Tie Breaker
Wayne County ATC	10	1	0	0	8	5	9	33		
Clay County ATC	10	1	0	0	7	9	5	32		
Logan County CTC	10	1	1	0	7	3	10	32		
Rockcastle County ATC	10	1	0	0	5	9	7	32		
Shelby County ATC	10	1	1	0	9	2	9	32		
Butler County ATC	10	1	0	0	9	6	5	31		
Floyd County ATC	10	1	0	1	4	10	5	31		
Harrodsburg ATC	10	0	0	0	9	5	7	31		
Marion County ATC	7	1	1	0	10	3	9	31		
Meade County ATC	10	1	0	0	8	3	9	31		
Barren Co	10	1	0	0	7	2	10	30		
Bell County ATC	10	0	0	0	6	9	5	30		
Garrard County ATC	9	1	1	0	10	4	5	30		
Green County ATC	10	1	0	0	8	4	7	30		
Montgomery County ATC	10	0	0	0	5	5	10	30		
Webster County ATC	10	2	0	0	9	2	7	30		
Carroll County ATC	10	0	0	0	7	5	7	29		
Murray/Calloway County	10	2	1	1	7	3	5	29		
Ohio County ATC	10	2	0	0	8	2	7	29		
Caldwell County ATC	10	1	0	0	9	1	7	28		
Campbell County ATC	0	3	0	1	10	5	9	28		
Clark County ATC	10	2	0	0	7	2	7	28		
Warren County ATC	10	3	0	0	10	0	5	28		

School	Prior On-Site Visits	Male/female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of CTE programs	Total Points	Notes	Tie Breaker
Casey County ATC	10	1	0	0	8	3	5	27		
Mayfield/Graves County	10	1	0	1	6	2	7	27		
Martin County ATC	3	1	0	0	6	10	5	25		
Mason County ATC	4	2	0	0	9	5	5	25		
Paducah ATC	6	1	1	0	9	0	7	24		
Fulton County ATC	10	1	0	0	5	2	3	21		
Madison County ATC	5	1	0	0	5	1	9	21		
Pulaski County ATC	4	1	1	1	7	2	5	21		

School	Prior On-Site Visits	Male/Female		Disability enrollment by institution	Minorities enrolled by institution	Male/Female enrollment by institution, by program	Minority		Total Points	Notes
		enrollment by institution	enrollment by institution				enrolled by institution, by programs	Number of CTE programs		
Total Possible Value	10	10	10	10	10	10	10	10	70	
Henderson Community College	10	0	0	1	0	8	5	10	34	1
Madisonville Community College	10	2	0	0	0	8	3	10	33	
Hazard Community and Technical College	9	1	0	0	0	7	6	10	33	
Southcentral Ky Community and Tech College	10	1	0	0	0	9	3	10	33	
Big Sandy Community and Tech. College	8	0	0	0	0	8	6	10	32	
Hopkinsville Community College	10	0	1	0	1	8	3	10	32	
West Kentucky Community and Technical College	10	1	0	0	0	8	3	10	32	
Ashland Community and Tech. College	6	0	0	1	0	8	6	10	31	
Elizabethtown Community and Technical College	10	0	0	0	0	8	3	10	31	
Gateway Community and Technical College	10	0	0	0	0	8	3	10	31	
Southeast Ky Community and Tech College	6	1	1	0	1	8	5	10	31	
Owensboro Community and Technical College	10	1	0	0	0	7	2	10	30	
Bluegrass Community and Technical College	10	0	0	1	0	6	2	10	29	
Jefferson Community and Technical College	10	0	0	0	0	6	2	10	28	
Maysville Community and Technical College	3	0	0	1	0	8	6	10	28	
Morehead State University	4	3	1	0	1	10	7	1	26	
Little Sandy Correctional Complex	10	5	0	0	0	5	3	1	24	
Murray State University	10	2	1	0	1	5	3	3	24	
Eastern Kentucky University	10	1	0	1	0	6	2	3	23	
Roederer Correctional Facility	10	5	2	0	2	5	0	1	23	
Blackburn Campus Correctional Facility	10	5	1	0	1	5	0	1	22	
Green River Correctional Facility	10	5	1	0	1	5	0	1	22	

School	Prior On-Site Visits	Male/Female enrollment by institution	Minorities enrolled by institution	Disability enrollment by institution	Male/Female enrollment by institution, by program	Minority enrolled by institution, by programs	Number of programs	Total Points	Notes
Ky State Penitentiary	10	5	1	0	5	0	1	22	
Ky State Reformatory	10	5	1	0	5	0	1	22	
Somerset Community College	0	0	0	1	7	4	10	22	
West KY Correctional Complex	10	5	1	0	5	0	1	22	
Ky Correctional Institute for Women	10	5	0	0	5	0	1	21	
Ky Luther Luckett Correctional Facility	10	5	0	0	5	0	1	21	
Western Kentucky University	3	1	0	1	7	3	5	20	

Education and Workforce Development Cabinet
Office of Career and Technical Education
2016-2017, 2017-2018 School Years

Selection Criteria

1. Prior On-Site Visits -- Data recorded for ten-year period
One point for each year not visited within past year
(maximum 10 points)
- | | |
|---|---------|
| Point Value (on-site visit within past 1 year) | 1 |
| Point Value (on-site visit within past 2 years) | 2 |
| Point Value (on-site visit within past 3 years) | 3 |
| Point Value (on-site visit within past 4 years) | 4 |
| Point Value (on-site visit within past 5 years) | 5, etc. |

TOTAL POSSIBLE VALUE	= 10
-----------------------------	-------------

2. Male/female enrollment by institution (data used is from previous school year), excluding Correctional Facilities (due to being unisex facilities). Correctional Facilities will be assigned a scaled score of 5 points.

Point Value (21% - 25% of one sex)	1
Point Value (16% - 20% of one sex)	2
Point Value (11% - 15% of one sex)	4
Point Value (6% - 10% of one sex)	6
Point Value (1% - 5% of one sex)	8
Point Value (0% of one sex)	10

TOTAL POSSIBLE VALUE	= 10
-----------------------------	-------------

3. Minorities enrolled by institution (data used is from previous school year)
Point Value (% of enrollments disproportionate by minority Individuals based on the demographics of the service region, 5% or more difference is disproportionate)

Point Value (0% - 4%)	0
Point Value (between 5% and 15%)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc

TOTAL POSSIBLE VALUE	
-----------------------------	--

4. Disability enrollment by institution (data used is from previous school year)
Point Value (% of enrollments disproportionate by disability individuals based on the demographics of the service region, 5% of more difference is disproportionate)

Point Value (0% - 4%)	0
Point Value (between 5% and 15%)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc

TOTAL POSSIBLE VALUE	= 10
-----------------------------	-------------

Education and Workforce Development Cabinet
Office of Career and Technical Education
2016-2017, 2017-2018 School Years

Selection Criteria (continued)

5. Male/female enrollment by institution, by program (data used is from previous school year), excluding Correctional Facilities (due to being unisex facilities). *Correctional Facilities will be assigned a scaled score of 5 points.

Number of programs that have less than 25% male/female students enrolled at that institution – divide by total # programs to get the percent of programs below desired standard. Example:
10 programs / 6 programs with less than 25% male/female = 60%
Point Value example 6

TOTAL POSSIBLE VALUE	= 10
-----------------------------	-------------

6. Minority enrollment by institution, by program (data used is from previous school year)
Count the number of programs that have less than 5% minority students enrolled at that institution if the institution has 5% or-greater total number enrolled – divide by total # programs to get the percent of programs below desired standard. Example: 12 programs 9 programs with less than 5% minority = 75 %
Point Value example 8
If the institution has less than 5% minorities then the
Point Value example will be 0

TOTAL POSSIBLE VALUE	= 10
-----------------------------	-------------

7. Number of Career and Technical Education programs offered at institution (data used is from previous school year)

Point Value (1 -3 programs offered)	1
Point Value (4 - 6 programs offered)	3
Point Value (7 - 9 programs offered)	5
Point Value (10 - 12 programs offered)	7
Point Value (13 - 15 programs offered)	9
Point Value (16 - over programs offered)	10

TOTAL POSSIBLE VALUE	= 10
-----------------------------	-------------

MAXIMUM TOTAL POSSIBLE POINT VALUE = 70
--

Kentucky Department of Education

2019-2020, 2020-2021

Selection Criteria for Post-Secondary and ATC's

1. Prior On-Site Visits.

One point for each year not visited within past year (maximum 10 points)

Point Value (on-site visit within past 1 year)	1
Point Value (on-site visit within past 2 years)	2
Point Value (on-site visit within past 3 years)	3
Point Value (on-site visit within past 4 years)	4
Point Value (on-site visit within past 5 years)	5, etc.

TOTAL POSSIBLE VALUE = 10

2. Male/Female enrollment by institution (data used from previous school year), excluding correctional facilities (due to being unisex) correctional facilities will be assigned a scaled score of 5 points.

Point Value (% of enrollment disproportionate by sex, compared to the subrecipient's total enrollment, 5% or more is disproportionate)

Point Value (0% - 4%)	0
Point Value (between 5% and 15 %)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc

TOTAL POSSIBLE VALUE = 10

3. Minorities enrolled by institution (data used from previous school year)

Point Value (% of enrollment disproportionate by minority based on the demographics of the service region, 5% or more is disproportionate)

Point Value (0% - 4%)	0
Point Value (between 5% and 15 %)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc

TOTAL POSSIBLE VALUE = 10

Kentucky Department of Education

2019-2020, 2020-2021

4. Disability enrollment by institution (data used from previous school year)

Point Value (% of enrollment disproportionate by disability individuals based on demographics of the service region, 5% or more difference is disproportionate.)

Point Value (0% - 4%)	0
Point Value (between 5% and 15%)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc.

TOTAL POSSIBLE VALUE = 10

5. Male/Female enrollment by institution by program (data is from previous school year) excluding correctional facilities (due to being unisex) *Correctional facilities will be assigned a scaled score of 5 points.

Number of programs that have less than 25% male/female students enrolled at that institution, divided by total # programs to get the percentage of programs below desired standard. Example: 6 programs with less than 25% male/female divided by 10 total programs = 60%. Point value 60% = 6 points.

TOTAL POSSIBLE VALUE = 10

6. Minority enrolled by institution by program (data used is from pervious school year)

Count the number of programs that have less than 5% minority students enrolled at that institution. Divided that number by the total # of programs to get the percentage of programs below desired standard.

Example 12 programs 9 programs with less than 5% ($9/12 = 75\%$.)

Point value = 8

If the institution has less than 5% minorities then the point value example will be 0

TOTAL POSSIBLE VALUE = 10

Kentucky Department of Education

2019-2020, 2020-2021

7. Number of Career and Technical Education programs offered at institution (data used is from previous school year)

Point Value (1-3 programs offered)	1
Point Value (4-6 programs offered)	3
Point Value (7-9 programs offered)	5
Point Value (10-12 programs offered)	7
Point Value (13-15 programs offered)	9
Point Value (16 and over programs)	10

TOTAL POSSIBLE VALUE = 10

Maximum Total Possible Points Value =70

Tie breakers are determined by last date of on-site visit.

Subrecipients with the greatest amount of points will be selected for review.

Kentucky Department of Education will conduct on-site reviews of one (1) post-secondary institution, one (1) area technical center, and four (4) local secondary school districts. For a total of six (6) on-site reviews yearly.

Kentucky Department of Education

2019-2020, 2020-2021

Selection Criteria for Secondary School Districts

1. Prior On-Site Visits.

One point for each year not visited within past year (maximum 10 points)

Point Value (on-site visit within past 1 year)	1
Point Value (on-site visit within past 2 years)	2
Point Value (on-site visit within past 3 years)	3
Point Value (on-site visit within past 4 years)	4
Point Value (on-site visit within past 5 years)	5, etc.

TOTAL POSSIBLE VALUE = 10

2. Male/Female enrollment by institution (data used from previous school year), excluding correctional facilities (due to being unisex) correctional facilities will be assigned a scaled score of 5 points.

Point Value (% of enrollment disproportionate by sex, compared to the subrecipient's total enrollment, 5% or more is disproportionate)

Point Value (0% - 4%)	0
Point Value (between 5% and 15 %)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc

TOTAL POSSIBLE VALUE = 10

3. Minorities enrolled by institution (data used from previous school year)

Point Value (% of enrollment disproportionate by minority based on the demographics of the service region, 5% or more is disproportionate)

Point Value (0% - 4%)	0
Point Value (between 5% and 15 %)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc

TOTAL POSSIBLE VALUE = 10

Kentucky Department of Education

2019-2020, 2020-2021

4. Disability enrollment by institution (data used from previous school year)

Point Value (% of enrollment disproportionate by disability individuals based on demographics of the service region, 5% or more difference is disproportionate.)

Point Value (0% - 4%)	0
Point Value (between 5% and 15%)	1
Point Value (between 16% and 25%)	2
Point Value (between 26% and 35%)	3
Point Value (between 36% and 45%)	4, etc.

TOTAL POSSIBLE VALUE = 10

5. Male/Female enrollment by institution by program (data is from previous school year) excluding correctional facilities (due to being unisex) * Correctional facilities will be assigned a scaled score of 5 points.

Number of programs that have less than 25% male/female students enrolled at that institution, divided by total # programs to get the percentage of programs below desired standard. Example: 6 programs with less than 25% male/female divided by 10 total programs = 60%. Point value 60% = 6 points.

TOTAL POSSIBLE VALUE = 10

6. Minority enrolled by institution by program (data used is from pervious school year)

Count the number of programs that have less than 5% minority students enrolled at that institution. Divided that number by the total # of programs to get the percentage of programs below desired standard.

Example 12 programs 9 programs with less than 5% ($9/12 = 75\%$.)

Point value = 8

If the institution has less than 5% minorities then the point value example will be 0

TOTAL POSSIBLE VALUE = 10

Kentucky Department of Education

2019-2020, 2020-2021

Maximum Total Possible Points Value = 60

Tie breakers are determined by last date of on-site visit.

Subrecipients with the greatest amount of points will be selected for review.

Kentucky Department of Education will conduct on-site reviews of one (1) post-secondary institution, one (1) area technical center, and four (4) local secondary school districts. For a total of six (6) on-site yearly reviews.

Matthew G. Bevin
Governor



Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

January 2, 2019

Dear Ms. Stevens-Williams and Mr. Deborde,

Thank you for taking the time to assist Kentucky Department of Education during our on-site civil rights compliance review of Boyd County High School and Boyd County Career and Technical Center conducted on December 13th. As you know, as a recipient of federal financial assistance, Boyd County School District is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. Because Boyd County High School and Boyd County Career and Technical Center are the only school in the district that offers career and technical education (CTE) programs, they are the only schools in the district that were visited during Kentucky's review. The purpose of the on-site review was to determine the school's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Boyd County School District was selected for review based on Kentucky Department of Education targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, and disability, length of the last compliance visit. The number of programs where females/males enrollment appeared disproportionate (greater than 75% of one sex enrolled), minority enrollment by a program, and the number of CTE programs offered.

This letter of findings (LOF) summarizes Kentucky Department of Education's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

This LOF describes any findings of noncompliance for which corrective action is required. A voluntary compliance plan (attached to this report) is a summary of findings that must be filled out with a remedy, expected date of completion and a person who is responsible for each it. The last page of the VCP must be signed by someone with authority to bind the district to take the necessary corrective actions. The VCP must be returned back to me within 45 days of date of this letter, due by February 18, 2019. The Boyd County voluntary compliance plan will be submitted to the Office of Civil Rights in Kentucky Department of Education's biennial report.

Please contact me if you need suggestions on how to correct a noncompliance item and I can offer suggestions or resources. When the plan is signed and in place please provide quarterly updates until all noncompliance items are corrected. When corrections have been made, update the date of completions column on the VCP and resubmit the VCP to me with proof the items have been corrected.

Thank you again for your cooperation during the on-site review. Your time and effort were much appreciated. Feel free to contact me if you have any questions regarding this LOF or if you need any assistance in preparing your VCP. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Thus, a school district may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

Sincerely,

Amy Ortwein
Kentucky Department of Education

Summary of Findings from On-site Review of Boyd County School District
Conducted on December 13, 2018

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O

Summary of Findings and Analysis: Kentucky Department of Education reviewed documentation provided by Boyd County School District to determine whether the district was appropriately providing its annual notice of nondiscrimination.

Boyd County School District provided a copy of its annual notice of nondiscrimination that was published in the newspaper on July 31, 2018. The notice included a summary of CTE offerings as well as the title and contact information for the school's designated Title IX and Section 504/Title II coordinator. The notice also included that a lack of English language skills will not be a barrier to admissions and participation in the schools CTE programs. The notice is also published on the district website.

Required Corrective Action(s): None.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Kentucky Department of Education asked administrative staff and reviewed documentation provided by Boyd County School District to determine whether the school was appropriately providing its continuous notice of nondiscrimination.

The student handbook does include a nondiscrimination notice on page 1 but the notice does not include a statement about providing equal access to the Boy Scouts and other designated youth groups. The notice that did appear on the website, employee handbook, and the notice around the school is the annual notice. The notice does state that Boyd County School System does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs or activities. It does not include a statement about providing equal access to the Boy Scouts and other designated youth groups.

Required Corrective Action(s): All continuous nondiscrimination notices need to have the "and provides equal access to the Boy Scouts and other designated youth groups" added to them.

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Boyd County School System's Title IX and Section 504/Title II coordinators were provided in all major school publications and on the school's website. Staff and students confirmed that the school community knew where to find this information. The Title IX and Section 504/Title II coordinators received training in their respective areas, and there is no evidence of concerns about the coordinators' performance of their duties or of any conflict of interest. There was no evidence of a violation.

Required Corrective Action(s): None.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Boyd County School System's Title IX and Section 504/Title II grievance procedures. The employee and

student handbooks have a link to where all school policy and procedures are posted. The grievance initiation form online states that at each level there must be a response within ten (10) school days upon receipt of the grievance at all levels of the grievance. Staff and students confirmed that the school community knew where to find the grievance procedures.

Required Corrective Action(s): None

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b) (1) (v), 104.4(a) and (b), 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed Boyd County School District's curriculum guide. The guide contained a description of each class, the number of credits available and any prerequisites. The student handbook contained graduation requirements and an explanation of the grading system.

The district offers female-only classes for the introduction to construction tech, floor and wall framing, maintenance and light repair sec A & B, blueprint reading for welding, and basic welding as a way to promote the classes to female students which is a violation of 106.34.

Required Corrective Action(s): All single-sex courses need to be removed from the course catalog. All CTE classes must be co-ed.

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: There was no evidence indicating that CTE programs were not open to English learners. The school has a district ESL Coordinator that ensures appropriate ELL services for ELL students. There is no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis: Boyd County School District's admission criteria for CTE programs were nondiscriminatory and there was no evidence to indicate that there has been an inappropriate application of admissions criteria for CTE programs, based on race, color, national origin, sex, or disability. Student's stated that counselors and advisers inform students of what CTE programs are available for students to take and they have never been steered to any certain program. All CTE pathways and course are published in the course curriculum guide and included in the course request forms. All incoming freshman are taken on tours of the CTE facilities to show them what is available for them and answer any questions they may have about the CTE programs. There is a male/female enrollment disproportion in a few CTE programs, but there was no evidence of inappropriate steering by counselors. 14 of the 20 CTE pathways have less than 5% minority enrolled in them according to the 2017-2018 TEDS data, but 2017-2018 enrollment in Boyd County High School has less than 5% of a minority enrolled. There is no evidence of steering minority students away from CTE pathways.

Required Corrective Action(s): None

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis: The school district has a consultant for the hearing impaired and KEDC has a hearing impaired cadre that meets to support service providers. The school

district doesn't have a community with limited English language skills in their service region. The district does have a plan in place for any English language learners that become enrolled in the school.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E

Summary of Findings and Analysis: Although there was disproportionate enrollment, there was no evidence that Boyd County School District promotional materials or activities created or perpetuated stereotypes or restrictions based on race, color, national origin, sex or disability.

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151, § 502.6

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for Boyd County High School and Boyd County Career and Technical Education Center as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
Boyd County Career and Technical Education Center	Original construction- January 1974	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Technical Center Parking Lot	Re-striped in September 2013	2010 ADA Standards
Boyd County High School	Original Construction – January 2013	2010 ADA Standards

Boyd County High School classrooms have tables instead of a desk all tables have enough knee clearance for a wheelchair-bound student. The ends of each cafeteria table have enough knee clearance for a wheelchair. All service counters are accessible. All classrooms and restrooms are accessible. The elevator is completely accessible. Water fountains meet 2010 ADA requirements for a parallel approach. The auditorium had more than the required ADA seating in various areas of the auditorium. The parking lot has enough accessible spaces closest to the accessible entrances. The spaces are clearly marked with correct signage, the signs are too low and must be at least 60 inches high measured from the bottom of the sign to ground. (2010 ADA standards 502.6)

Boyd County Career and Technical Education Center was built in 1975 and never altered. The welding booths are not accessible for disabled students, the school has two portable welders in the classroom available for use. The greenhouses are inaccessible for students in a wheelchair, but class does have a student in a wheelchair enrolled in the class and feed trough was

purchased and set outside the greenhouse for the student to grow plants. The school has made sure all services and CTE programs offered are readily accessible.

The parking lot at Boyd County Career and Technical Center was restriped in 2013 so it must follow 2010 ADA standards. The two accessible parking spots need signs with the International Symbol of Accessibility sign must be at least 60 inches high measured from the bottom of the sign to the ground. (2010 ADA standards 502.6)

Required Corrective Action(s): Raise the handicapped parking signs at Boyd County High School and install them at Boyd County Career and Technical Center.

IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. § 106.33

Summary of Findings and Analysis: Boyd County High School has locker rooms for male and female students that are comparable in number and condition. There was no evidence of a violation. A recommendation would be in the girl's locker room make sure the chairs are moved out of the middle of the floor, the chairs left haphazardly in the room are unnecessary obstacles.

Required Corrective Action(s): None.

V. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: The following documents provided by Boyd County School District were reviewed: Student Handbook; Employee Handbook; mission statement, job postings, applications for employment, Section 504 Policies and Procedures, and the district and Boyd County High School and Boyd County Career and Technical Education Center websites. The school has a full-time teacher for the visually impaired. Boyd County School District works with KY School for the Blind to get material for the visually impaired. At the high school, there are over half of the students with 504 plans enrolled in CTE classes. There was no evidence of a violation.

Required Corrective Action(s): None

VI. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis: Boyd County School District did not provide or assist in administering any financial assistance to any students. Thus, there was no evidence of a violation.

Required Corrective Action(s): None.

VII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. § 106.38(a).

Summary of Findings and Analysis: After reviewing Boyd County School District's Cooperative Education Program requirements, parent agreement form, student application, consent form and rules, and regulations there was no evidence of a violation.

Required Corrective Action(s): None.

VIII. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis: MOA Coordinator reviewed all job postings for staff and faculty positions used by the school on the website. The MOA Coordinator also reviewed the district's salary policies. There was no evidence of a violation.

Required Corrective Action(s): None.

Matthew G. Bevin
Governor



Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

January 30, 2019,

Dear Mr. Matt Hayes,

Thank you for taking the time to Kentucky Department of Education during our on-site civil rights compliance review of Grayson County School District conducted on January 22nd and 23rd. As you know, as a recipient of federal financial assistance, Grayson County School District is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. Because Grayson County High School and Grayson County Technology Center are the only schools in the district that offers career and technical education (CTE) programs, it is the only school in Grayson County School District that was visited during Kentucky Department of Education's review. The purpose of the on-site review was to determine the school's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Grayson County School District was selected for review based on Kentucky Department of Education targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, disability, length if the last compliance visit, number of CTE programs offered, minority enrollment by program.

This letter of findings (LOF) summarizes Kentucky Department of Education findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;

- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

This LOF describes any findings of noncompliance for which corrective action is required. A voluntary compliance plan (attached to this report) is a summary of findings that must be filled out with a remedy, expected date of completion and a person who is responsible for each item. The last page of the VCP must be signed by someone with authority to bind the district to take the necessary corrective actions. The VCP must be returned to me within 30 days of the date of this letter, due by March 1, 2019. The Grayson County voluntary compliance plan will be submitted to the Office of Civil Rights in Kentucky biennial report.

Please contact me if you need suggestions on how to correct a noncompliance item and I can offer suggestions or resources. When the plan is signed and in place please provide a quarterly update until all noncompliance items are corrected. When corrections have been made, update the date of completions column on the VCP and resubmit the VCP to me with proof the items have been corrected.

Thank you again for your cooperation during the on-site review. Your time and effort were much appreciated. Feel free to contact me if you have any questions regarding this LOF or if you need any assistance in preparing your VCP. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Thus, a school district may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with a MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

Sincerely,

Amy Ortwein
Kentucky Department of Education

Summary of Findings from On-site Review of Grayson County School District
Conducted on January 22-23, 2019

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O

Summary of Findings and Analysis: Kentucky Department of Education reviewed Grayson County School District website. The annual notice is on the website all year within one click on a visible link on the district home page and each school home page.

The notice included a list of each CTE program available and whom to contact for information about the programs and admissions criteria. Title IX and Section 504/Title II coordinators name, title, and contact information are listed on the noticed.

Required Corrective Action(s): None

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Kentucky Department of Education interviewed staff and reviewed documents provided by Grayson County School District to determine if the schools were providing the continuous notice of nondiscrimination. Staff knew where to find the continuous notice of nondiscrimination. Students did not know where to find the notice but admitted they don't read their handbooks or most signs posted around the school.

Grayson County School Districts continuous notice of nondiscrimination appeared in the student and employee handbook. The notice on the district's and the school's website is the annual notice, for it to be a combined notice that will meet all the requirement for an annual notice and a continuous notice the "and provides equal access to the Boy Scouts and other designated youth groups" needs to be added.

None of the continuous notices of nondiscrimination included the contact information for the Title IX and 504 Coordinator.

The continuous notice did not appear in all major school publication.

Required Corrective Action(s): All continuous nondiscrimination notices need to have the "and provides equal access to the Boy Scouts and other designated youth groups". Include the contact information for the Title IX and 504 Coordinator on all continuous nondiscrimination notices. The continuous nondiscrimination notice needs to be included in all major school publications for example school newsletter, brochures, course catalog, etc. (34 C.F.R. Section 108.9, 34 C.F.R. §§ 104.8)

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Grayson County School's Title IX and Section 504/Title II coordinators were provided on the school's website and in the employee handbook. The titles and contact information for the school's Title IX and Section 504/Title II coordinators were not provided in the student handbook. Interviews with staff and students confirmed that the school community knew where to find this information. The Title IX and Section 504/Title II coordinators received training in their respective areas, and there is no evidence of concerns about the coordinators' performance of their duties or of any conflict of interest.

Required Corrective Action(s): Add the School's Title IX and Section 504/Title II coordinators information in the student handbook. (*Guidelines* Section IV.O)

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Grayson County's grievance procedures. The procedures are posted online within one click from a visible link. The grievance procedures clearly state a grievance must be filed within 15 school days following the alleged violation. The grievance initiation form has a section for each level where the date the grievance was received at that level, a section to fill out a response to the grievance and a date for the response. Under each section, it states "This response shall be presented to the grievant within ten (10) school days of the receipt of this grievance at this level." The grievance procedures state that if the grievant does not file an appeal to the next level within ten school days of receiving a response, the grievance shall be considered settled.

The employee and substitute handbook list the internet address where the policy and procedures can be found. The student handbook states students can file grievances but doesn't give the link to where students can file the policy and the form.

Interviews with staff knew where to find the grievance procedures. Students did not know where to find the grievance procedures.

Required Corrective Action(s): Have the information where the grievance policy and procedures can be found in the student handbook (34 C.F.R. §§ 104.7(b))

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b)(1)(v), 104.4(a) and (b), 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed Grayson County's course description guide. The beginning of the document states the graduation requirements, the available advanced placement classes, and the dual credit classes offered and which postsecondary school the class is through. Each class offered has a description of the class, how many credits the class is, recommended grade level for the class, any prerequisites, and for the dual credit classes it clearly states the required ACT score for the class and that the student must pay for the class and the textbook. Any prerequisites to a class applied to all students, regardless of race, color, national origin, sex, or disability

Students in CTE programs participate in promoting CTE programs to all elementary and middle school students. All eighth graders are given a tour of the tech center to promote CTE classes to all students.

Interviews with students and staff did not raise concerns about any inappropriate application of admissions criteria for CTE programs based on race, color, national origin, sex, or disability. There was no evidence of a violation.

Required Corrective Action(s): None.

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: There was no evidence indicating that CTE programs were not open to English learners. Grayson County Schools Lau Plan has identification and placement procedures of ELs in language instructions education program in place to identify ELs and determine the appropriate level of service for each student. There are only 3 ELs enrolled in high school and 1 enrolled in a CTE class. Counselor receives biannual train to meet the needs of the district. There is no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis: School counselors are available to all students for a variety of services. 7 out of the 14 CTE programs offered at Grayson County High School and Grayson County Technology Center have less than 25% of one sex enrolled, but there doesn't seem to be any influence by the school counselors to steer students towards a program or away from certain programs based on sex. 11 of the 14 CTE programs have less than 5% of a minority enrolled, the school district has less than 5% of a minority enrolled in the school, and thus it is very hard for the school to have more than 5% of a minority enrolled in all the CTE programs. There does not appear to be any intentional steering of minority students by the school counselors. During student interviews, one student stated a counselor tried to persuade him from enrolling in a CTE class over worries the student would be injured in class. After interviewing several students, steering students with disabilities away from certain CTE classes doesn't seem to be the norm.

Schools are required to ensure that counselors do not steer students into or away from programs or careers based on the students' race, color, national origin, sex or disability.

Required Corrective Action(s):

Eliminate and prevent any steering of students into or away from particular CTE programs on the basis of disability. (*Guidelines* Sections V.A and B)

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis: The school has equipment in place for students who are hard-of-hearing to make it possible for students to participate in all classes. The school district and school-level staff ensure that ELs receive all school information in a language they clearly understand and that all classes and activities are open regardless of English proficiency. No school counselors are activity steering any EL's or hard-of-hearing towards or from any classes. No evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E

Summary of Findings and Analysis: Although there was disproportionate enrollment, there was no evidence that Grayson County School District's promotional materials or activities created, or perpetuated stereotypes or restrictions based on race, color, national origin, sex or disability. Grayson County High School has less than 5% of a minority enrolled in high school because of that there is a low number of minorities enrolled in CTE programs. There are some CTE programs with less than 25% of one sex enrolled, but the promotional literature that is disseminated to the students does not perpetuate any stereotypes or discriminate based on race, color, national origin, sex or disability

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for Grayson County School District, as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
Grayson County High School	Original construction- 1975	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Grayson County Technology Center	Original construction- 1975	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Grayson County High School	3 classrooms added to the school. Classrooms 35,34,33- 1985	ANSI
Grayson County High School	Addition to the front and side of the school - 1999	UFAS
Grayson County High School	Parking lots were sealed and restriped in 2015 and 2016	2010 ADA Standards
Grayson County High School	Plumbing renovations- 2014 and 2015	2010 ADA Standards

The following outlines areas of inaccessibility at Grayson County High School and Grayson County Technology Center.

Grayson County School 477 total parking spots and 4 accessible spots. The symbol of accessibility signs is too low and there is no van accessible sign. The signs are 43 inches from the bottom on the sign to the ground. (2010 ADA standards 502.6)

Required Corrective Action(s): At Grayson County High School for 477 total parking spots there need to be at least 9 accessible spots and 2 of those must be van accessible. The symbol of accessibility sign must be 60 inches high measured from the bottom of the sign to the ground. (2010 ADA standards 502.6)

The classroom doors at Grayson County High School require more than 5 pounds of pressure to open. (UFAS 4.13.11).

Required Corrective Action(s): Classrooms 32,26,25,17,15,13,12,10,7,6,3,2, and 1 need to have the doors adjusted so it requires less than 5 pounds of pressure to open the doors. (2010 ADA 404.2.9).

IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. § 106.33

Summary of Findings and Analysis: Grayson County High School had separate locker rooms for male and female students. Kentucky Department of Education reviewed the locker rooms and found they were comparable in number and condition. There was no evidence of a violation.

Required Corrective Action(s): None.

V. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed the following documents from Grayson County School District: employee handbooks, student handbooks, course catalog, 504 procedures, class registration, recruitment flyers, telecommunication devices policy, and the schools and districts websites, Staff states they have been invited and attended many IEP/504 meetings. Teachers state they comply with any accommodations a student may

have, teachers order braille material when needed, movement task when needed, extended time, etc. The districts special needs director is available to teachers if they need any tips or strategies to help students with disabilities.

Required Corrective Action(s): None

VI. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis: Grayson County School District does not provide or assist in administering any financial assistance to any students. Thus, there was no evidence of a violation.

Required Corrective Action(s): None.

VII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. § 106.38(a).

Summary of Findings and Analysis: The work-based learning information was reviewed. The application includes an assurance that the employer or other sponsor does not discriminate against students on the basis of race, color, national origin, sex, or disability. There was no evidence of a violation.

Required Corrective Action(s): None.

VIII. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis: Kentucky Department of Education reviewed Grayson County School Districts classified and certified job postings and applications. The classified and certified job postings both include a nondiscrimination notice. Kentucky Department of Education reviewed the district's certified and classified salaries policies.

Required Corrective Action(s): None

Matthew G. Bevin
Governor



Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

February 27, 2019

Dear Donald Damron:

Thank you for taking the time to assist Kentucky Department of Education during our on-site civil rights compliance review of East Carter High School, West Carter High School, and Carter County Career and Technical Center conducted on February 12-13, 2019. As you know, as a recipient of federal financial assistance, Carter County School District is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. Because East Carter High School, West Carter High School, and Carter County Career and Technical Center are the only school in the district that offers career and technical education (CTE) programs, They are the only schools in the district that were visited during Kentucky Department of Education's review. The purpose of the on-site review was to determine the school's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Carter County School District was selected for review based on Kentucky Department of Education targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, and disability, length of the last compliance visit, number of CTE programs offered, and minority enrollment by program. Carter County School District was chosen due to disproportionate enrollment when comparing male/female enrollment by program and low minority enrollment by program.

This letter of findings (LOF) summarizes State Agency's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

This LOF describes any findings of noncompliance for which corrective action is required. A voluntary compliance plan (attached to this report) is a summary of findings that must be filled out with a remedy, expected date of completion and a person who is responsible for each item. The last page of the VCP must be signed by someone with the authority to bind the district to take the necessary corrective actions. The VCP must be returned to me within 30 days of the date of this letter, due by March 29, 2019. The Carter County voluntary compliance plan will be submitted to the Office of Civil Rights in Kentucky's biennial report.

Please contact me if you need suggestions on how to correct a noncompliance item and I can offer suggestions or resources. When the plan is signed and in place please provide a quarterly update until all noncompliance items are corrected. When corrections have been made, update the date of completions column on the VCP and resubmit the VCP to me with proof the items have been corrected.

Thank you again for your cooperation during the on-site review. Your time and effort were much appreciated. Feel free to contact me if you have any questions regarding this LOF or if you need any assistance in preparing your VCP. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

Sincerely,

Amy Ortwein
MOA Coordinator
Kentucky Department of Education

Summary of Findings from On-site Review of East Carter High School, West Carter High School, and
Carter County Career and Technical Center
Conducted on February 12-13, 2019

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O

Summary of Findings and Analysis: Kentucky Department of Education reviewed documentation provided by Carter County School District to determine whether the district was appropriately providing its annual notice of nondiscrimination.

Carter County School District has the annual notice of nondiscrimination in English with information on whom to contact if it is needed in any other language posted on the district website year round within one link from a visible link. The notice includes a summary of each CTE program offered and whom to contact for admission criteria. The contact information for Title IX and Section 504/Title II coordinators is listed. There is assurance on the notice that lack of English language skills will not be a barrier to admissions or participation in the schools CTE programs.

Required Corrective Action(s): None

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Kentucky Department of Education interviewed administrative staff and reviewed documentation provided by East Carter High School, West Carter High School, and Carter County Career and Technical Center to determine whether the school was appropriately providing its continuous notice of nondiscrimination.

The continuous notice of nondiscrimination appeared in enrollment paperwork, 3CTC's course catalog. The notice is on the Carter County School District and Carter County Career and Technical Center website, the notice is missing the "and provides equal access to the Boy Scouts and other designated youth groups" wording and needs to be added. East Carter High School and West Carter High School need to have the notice posted on their website also. There is a continuous notice of nondiscrimination in all three schools student handbooks but it does not contain the Boy Scout wording. A continuous notice of nondiscrimination is posted around the schools.

East Carter High School, West Carter High School, and Carter County Career and Technical Center did not have the continuous notice of nondiscrimination on all major school publications or recruitment materials. All the notices that were posted or published did state that the school does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs or activities.

Required Corrective Action(s): Have the "and provides equal access to the Boy Scouts and other designated youth groups" wording on all continuous notices of nondiscrimination. Put the continuous notice of nondiscrimination on all major school publications, and recruitment material.

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Carter County School District's Title IX and Section 504/Title II coordinators were provided on the districts and Carter County Career and Technical Center website. The titles and contact information was not provided

on East Carter or West Carter High School websites. East Carter, West Carter, and Carter County Career and Technical Center student handbooks did not include the titles and contact information for the districts Title IX and Section 504/Title II coordinators.

During interviews with students stated they did not know who the compliance coordinators were or how to contact them. The Title IX and Section 504/Title II coordinators received training in their respective areas, and there is no evidence of concerns about the coordinators' performance of their duties or of any conflict of interest.

Required Corrective Action(s): Title and contact information for the district's Title IX and Section 504/Title II coordinators need to be included in the student handbooks, all major school publications, and each school's website.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Carter County School District's Title IX and Section 504/Title II grievance procedures. These procedures appeared in the student and employee handbooks on the district website. The teacher handbooks from West Carter High School and East Carter High School did not include the grievance procedures. The grievance procedures clearly explain whom to initial report a grievance to and each step. The procedures give reasonable timeframes for when filing a complaint, completing the investigation, and appealing any findings. The grievance procedures explain that they apply to all complaints of discrimination, including harassment and assault.

Interviews with staff and students confirmed that the school community knew where to find the grievance procedures.

Required Corrective Action(s): Add the grievance procedures to each schools teacher handbook.

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b)(1)(v), 104.4(a) and (b), 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed this school years course catalogs from East Carter High School, West Carter High School, and Carter County Career and Technical Center. West Carter High School course catalog provides an explanation of each course and the grade requirements for each. The catalog clearly states any prerequisites and requirements classes. East Carter High Schools scheduling guide contained general information including graduation requirements and the grading system. Each class contained an explanation of the course and the grades levels that can take the course and any prerequisites. Carter County Career and Technical Center's course catalog provides a clear explanation of each course and assurance that Carter County Career & Technical Center CTE classes are open to all students.

Interviews with students and staff did not raise concerns about any inappropriate application of admissions criteria for CTE programs based on race, color, national origin, sex, or disability.

Required Corrective Action(s): Include a statement in East Carter High School and West Carter High Schools course catalog that all students are eligible to take CTE courses regardless of race, color, national origin, sex, or disability.

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: There was no evidence indicating that CTE programs were not open to English learners. There are currently no English Learners enrolled in either of the high schools. The district has a fluent Spanish speaking employee to work one on one with ELL

students in addition to the district's ELL teacher. Carter County School District has English as a second language plan in place for students. The plan states how they identify ELL students and appropriate diagnostic procedures. There is support available for teachers to help with ELL students to make sure ELL students can fully participate and learn in class. There is no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis: Counselors at East Carter High School and West Carter High School are available for all students at their school. They offer many services to all students. Majority of CTE programs have less than 5% of minorities enrolled, but the school district has less than 5% minority enrolled in the high schools. Between the three schools, there are only 14 of the 32 CTE programs that have less than 25 % of one sex enrolled in the program. Over 10 % of the student enrolled in a CTE program have some form of a disability. It does not appear that any students are being steered away from taking CTE course or being steered towards a certain program based on, race, color, national origin, sex, or disability. Staff and students interviews did not reveal any steering towards or away from any CTE program based on race, color, national origin, sex, or disability.

Required Corrective Action(s): None

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis: Carter County School District employees a fluent Spanish speaker to work one-on-one with ELL students. The school has procedures in place for students who speak other languages. Carter County School District has procedures for students who are hard-of-hearing. No evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E

Summary of Findings and Analysis: All of the 8th graders in the districts visit the high school prior to enrolling in classes and visit all the CTE programs to learn about each one. After looking at several promotional materials or activities from each school it does not appear that any of the school are creating or perpetuating stereotypes or restrictions based on race, color, national origin, sex, or disability.

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for East Carter County High School, West Carter County High School, and Carter County Career and Technical Center as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
------	------------------------------	-----------------------------------

East Carter High School areas not specifically mentioned below.	Original construction- 1970	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
East Carter High School Gym	Addition – 1979	ANSI
East Carter High School classroom additions – 2 Restrooms, 111,112,113,114,115,116,220,221,222,223,224	Addition -1997	1991 ADA Standards
East Carter High School classroom additions- Choir/Band room, 225,226,227	Addition -2006	1991 ADA Standards
East Carter High School parking lot	Resurfacing/Striping- Summer 2014	2010 ADA Standards
West Carter High School areas not specifically mentioned below.	Original construction- 1970	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
West Carter High School Gym	Addition – 1979	ANSI
West Carter High School classroom additions- 2 Restroom, 110, 131, 133, 236, 238, 240, and Vo-Ag shop	Addition -1997	1991 ADA Standards
West Carter High School classroom additions	Addition -2006	1991 ADA Standards
West Carter High School parking lot	Resurfacing/Striping- Summer 2015	2010 ADA Standards
Carter County Career & Technical Center	Original construction- 1969	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Carter County Career & Technical Center	Resurfacing/Striping- approximately 10 years ago	1991 ADA Standards

The following outlines areas of inaccessibility at East Carter High School, West Carter High School, and Carter County Career and Technical Center

East Carter High School Restrooms- The men's and women's restrooms by the gym have uncovered pipes (ANSI 5.6.3) and the mirrors are higher than 40 inches from the bottom of the mirror to the ground (ANSI 5.6.4), the paper towel dispensers are higher than 40 inches from the floor (ANSI 5.6.6). The men's and women's restrooms do not provide the appropriate directional signage to the male and female handicap accessible restrooms with the physical disabilities as required by 1991 ADA Standards (4.30.1) and (4.30.7) and ANSI 5.11.

Required Corrective Action(s): Install mirrors that are no higher than 40 inches from the bottom of the mirror, wrapped exposed pipes, and lower paper towel dispenser so they are not higher than 40 inches from the floor. (2010 ADA 603). Install directional signage displaying the international symbol of accessibility to direct individuals with disabilities to the male and female restrooms located by classrooms 115, and 114 (2010 ADA 703.1 and 703.2).

East Carter High School Parking Lot- There are 291 total parking spots and 8 accessible spots. The accessible spots do not have any labeled van accessible. The accessible signs are varying in height. The signs posted on the wall are 81 inches high, the signs on post are 57 inches high. (2010 ADA Standards 502)

Required Corrective Action(s): 2 of the accessible spots need to be van accessible and labeled van accessible (2010 ADA Standards 502). The symbol of accessibility signs on post need to be raised until the bottom of the sign is 60 inches high measured from the ground to the bottom of the sign. (2010 ADA standards 502.6)

West Carter High School Restrooms- The men's and women's restrooms by the gym have uncovered pipes (ANSI 5.6.3), the mirrors are higher than 40 inches from the bottom of the mirror to the ground (ANSI 5.6.4), the paper towel dispensers are higher than 40 inches from the floor (ANSI 5.6.6), and the soap dispensers in the girls restroom is more than 40 inches high from the floor (ANSI 5.6.6). The men's and women's restrooms by classrooms 131, and 133 do not provide the appropriate directional signage to the male and female handicap accessible restrooms with the physical disabilities as required by 1991 ADA Standards (4.30.1) and (4.30.7).

Required Corrective Action(s): Install mirrors that are no higher than 40 inches from the bottom of the mirror, wrapped exposed pipes, and lower paper towel dispenser so they are not higher than 40 inches from the floor. Lower the soap dispenser in the girl's restroom so it is not higher than 40 inches from the floor. (2010 ADA 603). Install signage directional signage displaying the international symbol of accessibility to direct individuals with disabilities to the male and female restrooms located by classrooms 115, and 114 (2010 ADA 703.1 and 703.2).

West Carter High School- The family and consumer science classroom has microwaves above the stove inaccessible to all students. (Program Access)

Required Corrective Action(s): Install a microwave that is accessible to all students. (2010 ADA 308.2)

West Carter High School Parking Lot- There are 230 total parking spots and 10 accessible spots. The accessible signs are of various heights all signs are lower than 60 inches from the bottom of the sign to the ground. The van accessible spots are not labeled as van accessible (2010 ADA Standards 502)

Required Corrective Action(s): 2 of the accessible spots need to be van accessible and labeled van accessible (2010 ADA Standards 502). The symbol of accessibility signs on post need to be raised until the bottom of the sign is 60 inches high measured from the ground to the bottom of the sign. (2010 ADA standards 502.6)

Carter County Career and Technical Center Parking Lot- There are 20 total spots and 2 accessible parking spots. There are no handicap accessible signs. (1991 ADA Standards 4.6.3)

Required Corrective Action(s): Install symbol of accessibility signs for the accessible spots. The signs need to be 60 inches high measured from the ground to the bottom of the sign and the van accessible spot needs to have a van accessible sign. (2010 ADA standards 502.6)

IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. § 106.33

Summary of Findings and Analysis: East Carter High School and West Carter High School had separate locker rooms for male and female students. The facilities are comparable in number and condition. There is no evidence of a violation.

V. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed the following documents provided by Carter County School District: student handbooks, employee handbooks, mission statement, job postings, and district's 504 procedures, and the districts and each schools website. CTE teachers are invited to IEP/504 meeting for students. Teachers made all accommodations that are in the students' IEP/504 plan.

Required Corrective Action(s): None

VI. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis: Carter County School District does not provide or assist in administering any financial assistance to any students. Thus, there was no evidence of a violation.

Required Corrective Action(s): None.

VII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. § 106.38(a).

Summary of Findings and Analysis: Kentucky Department of Education reviewed Carter County School Districts work-based learning plan agreement. The agreement contained an assurance that the employer and the school do not discriminate against students on the basis of race, color, national origin, sex, or disability. Based on interviews with students, there was no evidence that students had been limited from internship or employment opportunities on the basis of their race, color, national origin, sex, or disability. Thus, there was no evidence of a violation.

Required Corrective Action(s): None.

VIII. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis: Kentucky Department of Education reviewed sample job postings for certified and classified positions in the district. All of the postings contained a nondiscrimination notice Kentucky Department of Education reviewed the district's certified and classified salaries policies. There was no evidence of a violation.

Required Corrective Action(s): None.

Matthew G. Bevin
Governor



Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

April 8, 2019

Dear Ms. Tiffany Felty:

Thank you for taking the time to assist Kentucky Department of Education during our on-site civil rights compliance review of Foster Meade Career and Technical Center conducted on March 19th. As you know, as a recipient of federal financial assistance, Lewis County School District is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. Because Foster Meade CTC is the only school in the district that offers career and technical education (CTE) programs ran by the district, that was the only school in the district that was visited during Kentucky Department of Education's review. The purpose of the on-site review was to determine the school's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Lewis County School District was selected for review based on Kentucky Department of Education targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, disability, length of the last compliance visit, number of CTE programs offered, and minority enrollment by program. Lewis County School District was chosen due to disproportionate enrollment when comparing male/female enrollment by a program and low minority enrollment by a program.

This letter of findings (LOF) summarizes Kentucky Department of Education findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;

- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

This LOF describes any findings of noncompliance for which corrective action is required. A voluntary compliance plan (attached to this report) is a summary of findings that must be filled out with a remedy, expected date of completion and a person who is responsible for each item.

The last page of the VCP must be signed by someone with the authority to bind the district to take the necessary corrective actions. The VCP must be returned back to me within 30 days of this letter, due by May 8, 2019. The Lewis County School District voluntary compliance plan will be submitted to the Office of Civil Rights in Kentucky Department of Education's biennial report.

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the Kentucky Department of Education's review and scheduling interviews were much appreciated. Feel free to contact me if you have any questions regarding this LOF or if you need any assistance preparing your VCP. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Thus, a school district may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

Sincerely,

Amy Ortwein
MOA Coordinator
Kentucky Department of Education

Summary of Findings from the On-site Review of Lewis County School District
Conducted on March 19, 2019

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O

Summary of Findings and Analysis: Kentucky Department of Education reviewed documentation provided by Lewis County School district to determine whether the district was appropriately providing its annual notice of nondiscrimination.

Lewis County School District provided a copy of its annual notice of nondiscrimination. Prior to the beginning of each school year, the notice was published in the local newspaper and is posted on the Lewis County Board of Education's bulletin board. The notice included what CTE offerings are available and whom to contact for more information and admissions criteria. The notice included the name, title, and contact information for Title IX and Section 504/Title. There is an assurance on the notice that lack of English skills will not be a barrier to admissions and participation. There was no evidence of a violation.

Required Corrective Action(s): None

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Kentucky Department of Education reviewed documentation provided by Lewis County School District to determine whether the school was appropriately providing its continuous notice of nondiscrimination.

A continuous notice of nondiscrimination did not appear in school newsletters, the program of studies, recruitment material, and Foster Meade CTC website.

Required Corrective Action(s): Have a continuous notice of nondiscrimination on all major school publications, all recruitment materials, and Foster Meade CTC website. The notice must include that the school does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs or activities and also clarify that all youth groups, including the Boy Scouts, will have equal access to school facilities. (Boy Scouts Act)

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Lewis County School District's Title IX and Section 504/Title II coordinators were not provided in all major school publications and on each school's website. Staff and students confirmed that the school community knew where to find this information. The Title IX coordinator has not had training in Title IX other than how it pertains to high school athletics. The Section 504/Title II coordinator has received training. Title IX coordinator is currently the district superintendent.

Required Corrective Action(s): Titles and contact information for Lewis County School District's Title IX and Section 504/Title II coordinators need to be on each school's website and published in all major school publications. Title IX coordinator needs to have more Title IX training. The Title IX coordinator should not be someone who has a potentially conflicting role (i.e. superintendent, principal, or athletic director.) (April 24, 2015, dear colleague letter for Title IX coordinators.)

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Lewis County School District's Title IX and Section 504/Title II grievance procedures. These procedures appeared in the student and employee handbooks. The grievance procedures clearly explain whom to initial report a grievance to and each step. The procedures give reasonable timeframes for when filing a complaint, completing the investigation, and appealing any findings. The grievance procedures explain that they apply to all complaints of discrimination, including harassment and assault. Students confirmed that the school community knew where to find the grievance procedures. There was no evidence of a violation.

Required Corrective Action(s): None

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b)(1)(v), 104.4(a) and (b), 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: The program of studies contained graduation requirements and an explanation of the grading system. The program of studies included a summary of each class offered and any prerequisites required. The program of studies does not include a continuous nondiscrimination notice or any assurance that the class is available for anyone based on race, color, national origin, sex, or disability.

Required Corrective Action(s): Include a continuous notice of nondiscrimination on the program of studies.

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: There was no evidence indicating that CTE programs were not open to English learners. There are currently no English learners enrolled. Less than 3% of the community that Foster Meade CTC serves have English as a second language. The school has a plan in place for when there are students enrolled with limited English skills. There was no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis: Counselors are available to assist all students with academic planning. Counselors do not appear to be steering students towards or away from any programs. There are many services available to help assist all students at the counselor office. Majority of CTE programs have less than 5% of minorities enrolled, but the school district has less than 5% minority. Student's interviews did not reveal any steering towards or away from any CTE program based on race, color, national origin, sex, or disability. There was no evidence of a violation.

Required Corrective Action(s): None

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis: There are no students enrolled with Limited English Speaking Ability, but they do have a plan in place if a student does enroll. The school has various technology and resources for hearing and visual impairments available for teachers, students, and students families. There was no evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E

Summary of Findings and Analysis: After reviewing promotional material for activities and classes there was no evidence that Foster Meade Career and Technical Center's promotional materials or activities created or perpetuated stereotypes or restrictions based on race, color, national origin, sex or disability. There was no evidence of a violation.

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for Foster Meade Career and Technical Center, as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
Foster Meade Career and Technical Center	Original construction- 1980	ANSI
Foster Meade Career and Technical Center parking lot	Re-stripping Summer 2018	2010 ADA Standards

The following chart outlines areas of inaccessibility at Foster Meade Career and Technical Center.

Foster Meade Career and Technical Center Parking Lot- There are 41 total parking spaces and 3 accessible spots. There was no designated van parking. The three symbols of accessibility signs on post are less than 60 inches from the ground to the bottom of the sign.

Required Corrective Action(s): Designate one accessible spot as van accessible and label it van accessible. Van accessible spots must be 132" wide and have an adjacent access aisle 60" minimum width or the spot can be 96" minimum with the access aisle is 96" wide. (2010 ADA 502.2). The accessibility signs must be 60" high from the bottom of the sign to the ground. (2010 ADA 502.6)

Foster Meade Career and Technical Center Restrooms- The soap dispenser in the men's and women's restroom is over 40 inches from the floor. (ANSI 5.6.6). The pipes in the men's, women's, and faculty restrooms are not wrapped. (ANSI 5.6.3). The paper towel dispenser in the men's and women's restroom is over 40 inches high. (ANSI 5.6.6)

Required Corrective Action(s): The pipes in the restrooms need to be insulated or configured to protect against contact (2010 ADA 606.5). 2010 ADA standards require dispenser to be between 15 inches and 48 inches, soap dispenser meet this requirement and no corrective action need. Paper towel dispensers need to be lowered so the dispenser is between 15 inches and 48 inches. (2010 ADA 604)

IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. § 106.33

Summary of Findings and Analysis: Foster Meade Career and Technical Center does not have a locker room and showers. There was no evidence of a violation.

Required Corrective Action(s): None.

V. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed the following documents provided by Lewis County School District: student handbook; employee handbook; job postings, applications for employment, Co-Op application materials, and the district and Foster Meade Career and Technical Center websites. Kentucky Department of Education also reviewed the district's Section 504 procedures for serving students with disabilities. There was no evidence of a violation.

Required Corrective Action(s): None

VI. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis: Foster Meade Career and Technical Center did not provide or assist in administering any financial assistance to any students. There was no evidence of a violation.

Required Corrective Action(s): None.

VII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. § 106.38(a).

Summary of Findings and Analysis: Kentucky Department of Education reviewed Foster Meade Career and Technical Center's Co-Op agreement. The agreement contained an assurance that the employer and the school do not discriminate against students on the basis of race, color, national origin, sex, or disability. There was no evidence of a violation.

Required Corrective Action(s): None.

VIII. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis: Kentucky Department of Education reviewed job applications for certified and classified positions in the district and hiring procedures. All of the job applications contained a nondiscrimination notice. There was no evidence of a violation.

Required Corrective Action(s): None.

Matthew G. Bevin
Governor



Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

May 13, 2019,

Dear Principal Franzen:

Thank you for taking the time to assist Kentucky Department of Education during our on-site civil rights compliance review of Campbell County Area Technical Center conducted on April 18, 2019. As you know, as a recipient of federal financial assistance, Campbell County Area Technology Center is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. The purpose of the on-site review was to determine the school's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Campbell County Area Technical Center was selected for review based on Kentucky Department of Education targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, and disability, length of the last compliance visit, number of CTE programs offered, minority enrollment by program, and male/female enrollment by program. Campbell County ATC was chosen due to the length of time since the last visit, male/female enrollment by program, minority enrollment by program, and the number of CTE programs offered.

This letter of findings (LOF) summarizes Kentucky Department of Education's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

This LOF describes any findings of noncompliance for which corrective action is required.

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the Kentucky Department of Education's review and scheduling interviews were much appreciated. Feel free to contact me if you have any questions regarding this LOF. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Thus, a school district may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

Sincerely,

Amy Ortwein
MOA Coordinator
Kentucky Department of Education

Summary of Findings from the on-site Review of Campbell County Area Technical Center
Conducted on April 18, 2019

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O

Summary of Findings and Analysis: Kentucky Department of Education interviewed administrative staff and reviewed documentation provided by Campbell County ATC to determine whether the district was appropriately providing its annual notice of nondiscrimination.

Campbell County ATC provided a copy of its annual notice of nondiscrimination. The notice is on the website year round. The notice included a list of CTE offerings and whom to contact for further information concerning the offerings and admissions criteria. The notice includes Sections 504 and Title IX contact information. The notice advises that the school system does not discriminate on the basis of race, color, national origin, age, religion, marital status, sex, genetic information, or disability and includes an assurance that lack of English language skills will not be a barrier to admissions and participation in the schools' offerings

Required Corrective Action(s): None

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Documentation provided by Campbell County ATC was reviewed to determine if the school was appropriately providing its continuous notice of nondiscrimination.

A continuous notice of nondiscrimination appeared in all major school publications, and on the school's website. It stated that the school does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs or activities. There was no evidence of a violation.

Required Corrective Action(s): None.

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Title IX and Section 504/Title II coordinators were provided in all major school publications and on the school's website. Interviews with staff and students confirmed that the school community knew where to find this information. The Title IX and Section 504/Title II coordinators received training in their respective areas, and there is no evidence or concerns about the coordinators' performance of their duties or of any conflict of interest. There was no evidence of a violation.

Required Corrective Action(s): None.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed the Title IX and Section 504/Title II grievance procedures. These procedures appeared in school publication and are easily found on the district website and the school's website. The grievance procedures clearly explain whom to initially report a grievance to and each step of the process. The procedures give reasonable timeframes for when filing a complaint, completing the investigation, and appealing any findings. The grievance procedures explain that they apply to all complaints of discrimination, including harassment and assault.

Interviews with staff and students confirmed that the school community knew where to find the grievance procedures.

Required Corrective Action(s): None.

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b)(1)(v), 104.4(a) and (b), 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed Campbell County Area Technology Center's course schedule and descriptions. It states that the school does not discriminate on any educational opportunities. The course schedule has a description of each class offered and how many credits each class is worth and any prerequisites. There was no evidence of a violation.

Required Corrective Action(s): None.

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: There was no evidence indicating that CTE programs were not open to English learners. Campbell County ATC does not serve a community with English as their second language. Less than 1% of the student population in their district has limited English language skills. Assistance is available to students with limited English language skills and students are notified of the assistance available and assured they will have assistance as needed to be successful in CTE programs if they choose to enroll. There is no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis: Interview with students did not reveal any inappropriate application of admissions criteria for CTE programs, based on race, color, national origin, sex, or disability. Interviews with school counselors did not reveal any discriminatory actions. There is no evidence of a violation

Required Corrective Action(s): None

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis: There are is district-wide teacher and a para-educator who work with teachers to provide resources that support student learning. The school also had procedures in place for counseling students who speak other languages or who are hard-of-hearing. No evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E

Summary of Findings and Analysis: Campbell County ATC's promotional material or activities do not appear to perpetuate stereotypes or restrictions based on race, color, national origin, sex, or disability.

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for Campbell County ATC, as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
Campbell County ATC	Original construction- After March 2012	2010 ADA Standards
Parking Lot	Repaved after March 2012	2010 ADA Standards

The Campbell County Area Technical Center did not have any areas of inaccessibility.

The Campbell County Area Technical Center had the correct number of accessible parking spots and van accessible spots are clearly marked. The signage was over 60 inches high from the ground and the parking spaces and access aisle were wider than required. Accessible parking spots are the closest parking post to the accessible entrance.

The accessible entrance is clearly marked and on an accessible route. Door openings are over 32 inches wide. There is adequate maneuvering clearance space for the accessible entrances.

The restrooms were located on an accessible route in the school and marked with accessible signage. The accessible stall was 60 inches by 60 inches with the toilet seat height of 17 inches. Grab bars are on the side (42 inches) and back (37 inches). There is adequate door opening space into the stall. Toilet paper dispenser was 21 inches high from the ground. Urinal rim is 17 inches from the floor. Clear floor space in front of the accessible sink was satisfactory. The sink was 33 inches high and 17 inches deep with acceptable knee and toe clearance. The pipes were wrapped and the sink hardware was useable with one hand. The bottom of the reflecting edge of the mirrors is 39 inches from the floor. Soap and hand towels are 39 inches high from the ground.

All classrooms doors are 34 inches wide. All classrooms have a desk, but there are two tables in each classroom that are accessible they have adjustable heights and are set at 29 inches high. Each table has 30-inch knee clearance. Each sink, soap dispenser, and towel dispenser in each shop are accessible.

IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. § 106.33

Summary of Findings and Analysis: Campbell County ATC does not have any locker room. There was no evidence of a violation.

Required Corrective Action(s): None.

V. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed documentation provided by the school including the Section 504 procedures for serving students with disabilities and the Special Education procedures. Interviews with students did not reveal that the school was not providing services for disabilities. There is no evidence of a violation.

Required Corrective Action(s): None

VI. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis: Campbell County ATC did not provide or assist in administering any financial assistance to any students. Thus, there was no evidence of a violation

Required Corrective Action(s): None.

VII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. § 106.38(a).

Summary of Findings and Analysis: Kentucky Department of Education reviewed Campbell County ATC Co-Op application. The application included the school's nondiscrimination notice and contained an assurance that the employer does not discriminate against students on the basis of race, color, national origin, sex, marital status, age or disability. There was no evidence of a violation.

Required Corrective Action(s): None.

VIII. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis: Kentucky Department of Education reviewed Campbell Co ATC's hiring practices and procedures. The posting contains a nondiscrimination notice and no practices and procedures seem to be discriminatory. There was no evidence of a violation.

Required Corrective Action(s): None.

Matthew G. Bevin
Governor



Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

July 10, 2019,

Dear Superintendent Orr:

Thank you for taking the time to assist the Kentucky Department of Education during our on-site civil rights compliance review of Powell County High School conducted on May 7, 2019. As you know, as a recipient of federal financial assistance, Powell County School District is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. Because Powell County High School is the only school in the district that offers career and technical education (CTE) programs, That was the only school in the district that was visited during Kentucky Department of Education's review. The purpose of the on-site review was to determine the school's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Powell County High School was selected for review based on Kentucky Department of Education targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, and disability, length if the last compliance visit, number of CTE programs offered, minority enrollment by program, and male/female enrollment by program. Powell County High School was chosen due to the length of time since the last visit, male/female enrollment by program, minority enrollment by program, and the number of CTE programs offered.

This letter of findings (LOF) summarizes State Agency's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placement; and
- VIII. Employment.

This LOF describes any findings of noncompliance for which corrective action is required. A voluntary compliance plan (attached to this report) is a summary of findings that must be filled out with a remedy, expected date of completion and a person who is responsible for each item.

The last page of the VCP must be signed by someone with the authority to bind the district to take the necessary corrective actions. The VCP must be returned back to me within 30 days of this letter, due by August 9, 2019. The Powell County School District voluntary compliance plan will be submitted to the Office of Civil Rights in Kentucky Department of Education's biennial report.

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the Kentucky Department of Education's review and scheduling the interviews were much appreciated. Feel free to contact me if you have any questions regarding this LOF or if you need any assistance preparing your VCP. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Thus, a school district may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

Sincerely,

Amy Ortwein
MOA Coordinator
Kentucky Department of Education

Summary of Findings from the On-site Review of Powell County School District
Conducted on May 7, 2019

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O

Summary of Findings and Analysis: Kentucky Department of Education interviewed staff and reviewed documentation provided by Powell County School District to determine whether the district was appropriately providing its annual notice of nondiscrimination.

The school district provided a copy of its annual notice of nondiscrimination. Prior to the beginning of the school year, the notice was published in the local newspaper. There is a notice on the website all year long, that notice has different contacts for Title II and Title IX. The notice appropriately included a brief summary of CTE offerings and admission criteria as well as the title and contact information for the school's designated Title IX and Section 504/Title II coordinators. The notice contains an assurance that a lack of English language skills will be a barrier to admission and participation in CTE offerings.

Required Corrective Action(s): Correct all notices to have the correct names and titles for contact information.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Kentucky Department of Education interviewed staff and reviewed documentation provided by Powell County school district to determine whether the school was appropriately providing its continuous notice of nondiscrimination.

A continuous notice of nondiscrimination appeared on the school's website and most of the major school publications. It stated that the school does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs or activities. It also clarified that all youth groups, including the Boy Scouts, will have equal access to school facilities.

Required Corrective Action(s): Include the district's nondiscrimination notice on all major publications, including all recruiting material, and co-op material.

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Powell County High school's Title IX and Section 504/Title II coordinators were provided in all major school publications and on the school's website. Interviews with staff and students confirmed that the school community knew where to find this information. The Title IX and Section 504/Title II coordinators received training. There does not appear to be any conflict of interest for the Title IX and Section 504/Title II coordinators. There was no evidence of a violation.

Required Corrective Action(s): None.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Powell County school district's Title IX and Section 504/Title II grievance procedures. The grievance procedures clearly explain whom to initial report a grievance to and each step. The procedures give reasonable timeframes for when filing a complaint, completing the investigation, and appealing any findings. The grievance procedures explain that they apply to all complaints of discrimination, including harassment and assault. There was no evidence of a violation. These procedures

appeared in the student and employee handbooks. Interviews with staff and students confirmed that the school community knew where to find the grievance procedures.

Required Corrective Action(s): None.

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b)(1)(v), 104.4(a) and (b), 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Powell County High School's scheduling cards-career pathways for students included graduation requirements and in what order classes should be taken in each pathway. It is clearly stated for all students that the CTE classes must be taken in the order they give even if a student is taken the class as an elective and not following the complete pathway. The requirements for the CTE classes apply to all students regardless of race, color, national origin, sex, or disability. There was no evidence of a violation.

Required Corrective Action(s): None.

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: The school district does not have a community of people that English is their second language or English is their parent's second language. Less than 2% of the school population has limited English language skills. The district's policy and procedures to identify English Learners require a program service plan within 30 days of the first day of school or within 2 weeks if enrolled after the first day. The district is prompt in having students with limited English skills identified and a plan in place to help the students be successful in school. The district has an EL assistant that works with the students and staff to ensure the student's success. There is no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis: Counselors at Powell County High School are available for all students regardless of race, color, national origin, sex, or disability. Counselors offer many services for all students. 10 out of the 15 CTE programs have less than 5% minority enrolled. The community that Powell County High School serves has less than 5% living in the community. 40% of the students with a disability enrolled in Powell County High School are enrolled in a CTE program. Counselors do not appear to be steering students towards or away from any pathway based on race, color, national origin, sex, or disability.

Required Corrective Action(s): None

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis: The community Powell County High School serves does not have a community that English is their second language. Less than 2% of the population reports English as their second language. The school currently has only 1 student identified as an English Language Learner. The district has a translator to assist as needed. The district has numerous devices available to assist communications with a visually or hearing impaired student or parent. No evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E

Summary of Findings and Analysis: There is a disproportionate enrollment with male/female enrollment in CTE programs. 9 out of 15 CTE programs have less than 255 of one sex enrolled and 10 out of the 15 CTE programs have less than 5% minority enrolled. Powell County High Schools promotional materials or activities do not appear too created or perpetuated stereotypes or restrictions based on race, color, national origin, sex or disability. The school promotes all programs to all students.

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

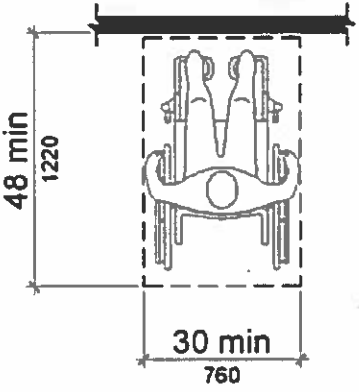
Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for Powell County High School, as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
All areas not specifically mentioned below.	Original construction- 1973	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Vocational addition	Alteration (added classrooms)- 1976	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150
Classroom Addition	Alteration (classrooms added)- 1990	ANSI
Cafeteria and classroom addition	Alteration (cafeteria and classrooms added)- 2002	1991 ADA Standards
Classroom Addition	Alteration (classrooms added)- 2014	2010 ADA Standards
Left side and lower right side parking lot	Resurfaced- July 2016	2010 ADA Standards
Front, upper right, and bus garage parking lot	Resurfaced July 2018	2010 ADA Standards

The following chart outlines areas of inaccessibility at Powell County High School.

Accessibility Violation	Applicable Standard	Required Corrective Action
<p>Classrooms 10 and 12 have counters that are 35 inches high counter</p>	<p>Program Access; 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.</p>	<p>Have a section of the counters in the classrooms that the top is between 28 inches and 34 inches from the finished floor. Clear floor space in front of the counter must be big enough for a forward approach. (forward approach is 30 inches wide and 48 long</p>  <p>(a) forward</p> <p>minimum)</p> <p>The counter must provide appropriate knee and toe clearance. (Knee clearance shall be 11 inches deep minimum at 9 inches above the finished floor. And 8 inches deep mi. at 27 inches above the finished floor.)</p> <p>902.3, 305,306.3 of the 2010 ADA Standards</p> <p>Alternatively, because the classrooms are subject to a program access standard, Powell County High School may designate an existing accessible space for the two classrooms that are accessible.</p>
<p>Parking space identification. None of the signage with the International Symbol of Accessibility are at the correct height. The accessible space in front of the bus garage did not have a sign.</p>	<p>2010 ADA Standards 502.6 Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches</p>	<p>Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. Place an International Symbol of Accessibility in front of the accessible spot that the bus garage. Van accessible spots must say van accessible. (Must have two). 2010 ADA Standards 502</p>

	(152mm) minimum above the finish floor or ground surface measured to the bottom of the sign	
The number of accessible parking spaces. There are 325 total parking spaces and 7 accessible parking spaces.	2010 ADA Standards 208.2. For 325 total parking spots there need to be 6 accessible parking spots + 2 van accessible parking spaces.	Add an accessible parking spot on an accessible route.

IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. § 106.33

Summary of Findings and Analysis: Powell County High School had separate locker rooms and showers for male and female students. The locker rooms are comparable in number of lockers, showers, and condition. There was no evidence of a violation.

Required Corrective Action(s): None.

V. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed documentation provided by Powell County High School and the district's Section 504 policy. Interviews did not reveal that any 504 plans were not being followed. There was no evidence of a violation.

Required Corrective Action(s): None

VI. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis: Powell County High School did not provide or assist in administering any financial assistance to any students. There was no evidence of a violation.

Required Corrective Action(s): None.

VII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. § 106.38(a).

Summary of Findings and Analysis: Kentucky Department of Education reviewed Powell County High School's Co-Op application and the letter sent to parents/guardians.

- The letter contained the district's nondiscrimination notice, however, the program application did not.
- The program application request both parents name and occupations, inquiries about the student's health, asker for an explanation of any physical weaknesses/disabilities and additionally requested if the student had a driver's license.
- In the student evaluation form, the evaluation chart incorporates the student's "personal appearance" as one of the chart's criteria for evaluation.
- Form # 1 on the Powell County High School checklist for cooperative education programs requires driver permission form and copy of driver's license.

Information about the parents of the students is not necessary for the district in determining the student's eligibility or approval for the Co-Op program.

The student's health should not impact approval into the program, nor should a student have to provide explanations concerning their weaknesses or disabilities.

A driver's license and a vehicle should not be a requirement for the program if a student chooses to participate in the Co-Op program. A student may be responsible for providing their own transportation however, they should not be required to have access to a vehicle and possess a driver's license

Required Corrective Action(s):

Remove driver permission form and copy of driver's license request from form # 1.

On the program application, remove mother and father's name and occupation request, health question, explain any physical weaknesses/disabilities question, remove the driver's licenses and will you have access to a car to drive to work each day question.

On the student evaluation form remove the line on the chart where students are to be graded on their personal appearance.

VIII. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis: Kentucky Department of Education reviewed certified job application, administrator job application, instructional assistant application, general application, and bus driver application all applications contained a nondiscrimination notice and did not inquire about applicate gender, race, age, national origin, religion, marital status, or disability. Kentucky Department of Education reviewed salary policies. There was no evidence of a violation.

Required Corrective Action(s): None.

*This review's findings only address the subject's compliance with certain and specific statutory and regulatory provisions. This method of administration review only addresses Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106. Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35 and the Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs. A finding of compliance is limited to **only** those sections of statutes and regulations specifically examined in this report and should not be interpreted as a blanket statement of compliance with all areas of the mentioned statutes, regulations or other applicable law.*



Matthew G. Bevin
Governor

Derrick Ramsey
Secretary
Education and Workforce
Development Cabinet

Wayne D. Lewis, Ph.D.
Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

300 Sower Boulevard • Frankfort, Kentucky 40601
Phone: (502) 564-3141 • www.education.ky.gov

August 29, 2019

Dear Dr. Carey Castle,

Thank you for taking the time to assist Kentucky Department of Education during our on-site civil rights compliance review of Somerset Community College conducted on July 8, 2019, at the Clinton Campus, July 15-16 Laurel Campus, and July 23-25 Somerset Campus. As you know, as a recipient of federal financial assistance, Somerset Community College is required to comply with federal laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education programs to conduct compliance reviews of subrecipients that offer career and technical education programs and that receive federal financial assistance from the U.S. Department of Education. The purpose of the on-site review was to determine the college's compliance with the *Guidelines* and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Somerset Community College was selected for review based on Kentucky Department of Education's targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex, and disability, length of the last compliance visit, number of CTE programs offered, minority enrollment by program, and male/female enrollment by program. Somerset Community College was chosen due to length since last compliance visit, number of CTE programs, and male/female enrollment by institution, by program.

This letter of findings (LOF) summarizes Kentucky Department of Education's findings in the following nine major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;

- III. Accessibility;
- IV. Comparable Facilities;
- V. Housing;
- VI. Services for Students with Disabilities;
- VII. Financial Assistance;
- VIII. Work-study, Cooperative Programs, and Job Placement; and
- IX. Employment.

This LOF describes any findings of noncompliance for which corrective action is required. All required corrective action must be included in Somerset Community College's Voluntary Compliance Plan (VCP). A VCP template is attached, though you may use a different format if you so choose. At a minimum, your VCP should address every item of noncompliance, describe the corrective action that your college will take to remedy each item, the target completion date (month and year), and a statement of how completion of the corrective action will be reported and verified to Kentucky Department of Education. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. Please return your completed VCP to Kentucky Department of Education by September 30, 2019. We will review the VCP, and either approve it as is or work with you to ensure that the appropriate corrective action is taken to bring your college into compliance.

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the Kentucky Department of Education's review and scheduling interviews were much appreciated. Feel free to contact me if you have any questions regarding this LOF or if you need any assistance preparing your VCP. Please be advised that your college has a continuing obligation to maintain compliance with all civil rights requirements.

Please note that Federal law prohibits retaliation against individuals because they assisted or participated in any manner in an investigation under Title VI, Title IX, Section 504, or the ADA. Thus, a postsecondary institution may not intimidate, threaten, coerce, or discriminate against any individuals because of their cooperation with an MOA review. See 34 C.F.R. §§ 100.7(e), 104.61, 106.71; 28 C.F.R. § 35.134.

Sincerely,

Amy Ortwein
Program Coordinator, Kentucky Department of Education

Summary of Findings from the On-site Review of Somerset Community College
Conducted on July 8, 15-16, 23-25, 2019

I. Administrative Requirements

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. § 100.6(d)

Summary of Findings and Analysis: Kentucky Department of Education interviewed administrative staff and reviewed documentation provided by Somerset Community College to determine whether the college was appropriately providing its annual notice of nondiscrimination.

Somerset Community College provided a copy of its annual notice of nondiscrimination. The school could not provide information about how the notice was disseminated to the public. The notice appropriately included a brief summary of CTE offerings and who to contact for admission criteria. Title and contact information for the college's designated Title IX and Section 504/Title II coordinators were missing. The notice stated the college did not discriminate on the basis of race, religion, color, sexual orientation, gender identity or expression, national origin, age, disability, family medical history, or genetic information.

Required Corrective Action(s): Disseminate the annual notice of nondiscrimination to the public. In the notice include the name, title, address, telephone number of the Title IX and Section 504 coordinators. This action was addressed and correct annual notice of nondiscrimination was placed on the schools website before the MOA coordinator left Somerset Campus.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106

Summary of Findings and Analysis: Kentucky Department of Education reviewed Somerset Community College's continuous notice of nondiscrimination. The notice states the college does not discriminate on the basis of race, religion, color, sex, gender identity, gender presentation, national origin, age, disability, family medical history, genetic information, sexual orientation, parental status, marital status, political affiliation, military service, or any other non-merit based factor. The notice is on the website, all major publication, recruitment material, there isn't a notice posted around North Laurel, South Laurel, North Somerset, or South Somerset campuses. In June 2019 Kentucky Pregnant Workers Act became effective, going forth in all employee documentation, the continuous nondiscrimination notice needs to include that the school expressly prohibits employment discrimination in relation to an employee's pregnancy, childbirth, and related medical conditions.

Required Corrective Action(s): Post a continuous notice of nondiscrimination notice in each building on each campus. The action was completed before MOA coordinator left Somerset Campus.

C. Designation of Compliance Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis: The titles and contact information for Somerset Community College's Title IX and Section 504/Title II coordinators were provided in all major college publications and on the college's website. Interviews with staff and students confirmed that the college's community knew where to find this information. The Title IX and Section 504/Title II coordinators received training in their respective areas, and there is no evidence of concerns about the coordinators' performance of their duties or any conflict of interest. There was no evidence of a violation.

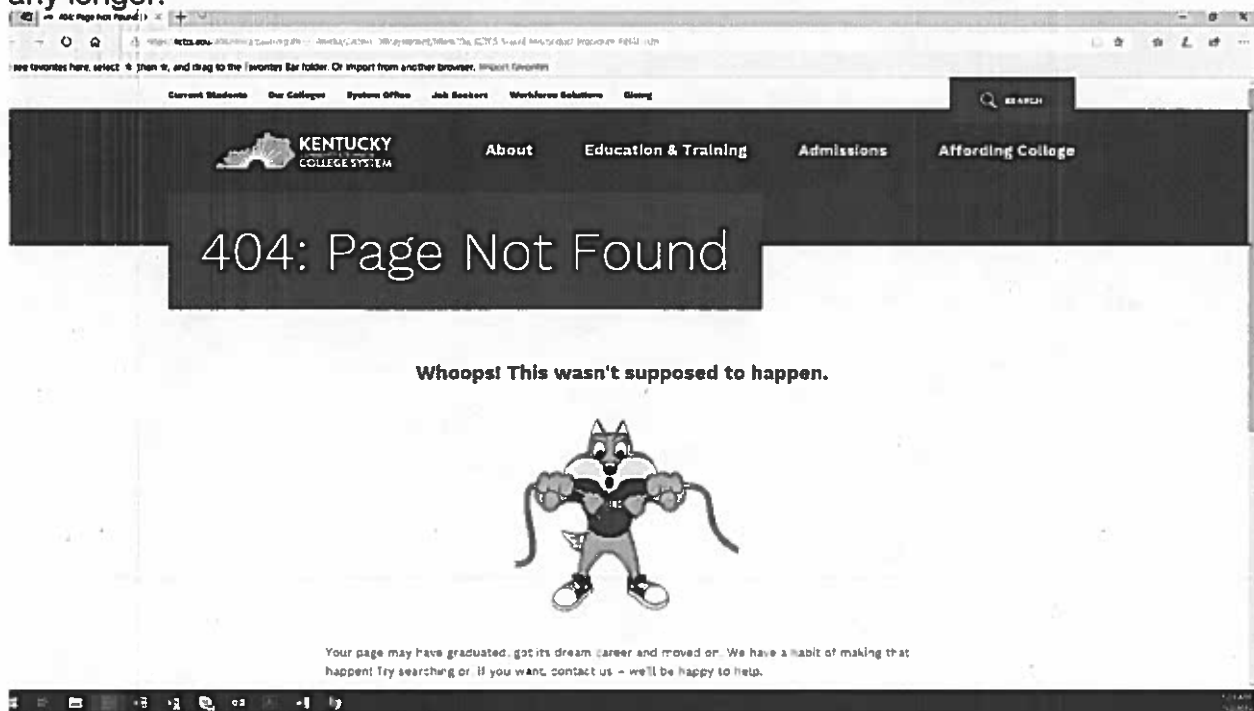
Required Corrective Action(s): None.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§ 104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Somerset Community College's grievance procedures. These procedures appeared in the student handbook and the student code of conduct and on the KCTCS employee webpage in multiple places. Interviews with staff and students confirmed that the college's community knew where to find the grievance procedures. The grievance procedure explained each step with timeframes. The appeals process is explained and how, when, and by who a decision will be issued by.

Somerset Community College's sexual misconduct procedures apply to all KCTCS employees, students, colleges, offices, and workplaces, regardless of location. The procedures state all reporting options. There is also a link and a toll-free number listen for anonymous on-campus reporting of non-emergency situations. The initial assessment, investigation, informal resolution, formal resolution, time frame for resolutions, and all records kept are clearly explained. The link in the KCTCS Code of Student Conduct isn't linked to the sexual misconduct procedures any longer.



Required Corrective Action(s):

Include the sexual misconduct procedures in the KCTCS Code of Student Conduct or correct the link in the document.

II. Recruitment, Admissions, and Counseling

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.K, and IV.N; 34 C.F.R. §§ 100.3(a) and (b)(1)(v), 104.4(a) and (b), 104.42(a), (b) and (c), 104.43, 106.21, 106.22, 106.34 and 106.35; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Kentucky Department of Education reviewed Somerset Community College's application. The application required prospective students to provide personal information such as a Social Security number, address, ethnicity, citizenship status, and information regarding military service. The application also had the applicant indicate educational history and educational goals.

Kentucky Department of Education reviewed the KCTCS course catalog that is published for all of the 16 community colleges that KCTCS is comprised of, that includes Somerset Community College. The course catalog contained general information including program, certificate, and degree requirements and an explanation of the grading system. The course catalog has a description of each CTE program, a list of classes offered and their credit value that are available to take to complete diploma or certificate track the student chooses. Each class has a description of the course, list any pre-requisites or co-requisites, number of credits available. The course catalog contained a non-discrimination notice and did not raise discrimination concerns.

Required Corrective Action(s): None

B. Access for National Origin Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis: There was no evidence indicating that CTE programs were not open to English learners. None of Somerset Community Colleges campuses are in or near a community with English as a second language. There is not a large number of students enrolled in the college with limited English language skills. The college does promote CTE programs to all students and ensures the students that do have limited English language skill have resources available to assist them with what they may need. There was no evidence of a violation.

Required Corrective Action(s): None.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A, V.B, and V.D; 34 C.F.R. §§ 100.3(a) and (b), 104.47(b), and 106.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis: Somerset Community College's admission criteria for CTE programs were nondiscriminatory on their face and there was no evidence to indicate that there had been an inappropriate application of admissions criteria for CTE programs, based on race, color, national origin, sex, or disability.

Advisors do not seem to be steering students into or preventing students from particular programs. Interviews with students did not raise any concerns. There was no evidence of a violation.

Required Corrective Action(s): None

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. §§ 100.3(a) and (b) and 104.47(b)

Summary of Findings and Analysis: Somerset Community College have employees who speak Spanish and the school utilizes interpreters to communicate effectively with students that have limited English speaking ability. The college obtains a sign language interpreter from an agency as needed for students with hearing impairments. The sign language interpreter is also available to assist in counseling students. There is no evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Sections V.A, V.C, and V.E; 34 C.F.R. §§ 104.42(a) and 106.23(a) and (b)

Summary of Findings and Analysis: Although there was disproportionate enrollment, there was no evidence that Somerset Community College promotional materials or activities create or perpetuate stereotypes or restrictions based on race, color, national origin, sex or disability.

Required Corrective Action(s): None.

III. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§ 104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

The following chart indicates the construction/alteration dates for Somerset Community College, as well as the applicable accessibility standards.

AREA	CONSTRUCTION/ALTERATION DATE	APPLICABLE ACCESSIBILITY STANDARD
Clinton Center	Original Construction- 2004	1991 ADA Standards
Clinton Center- Cosmetology Classrooms	Alternation- 2010	1991 ADA Standards
Clinton Center Parking Lot	Seal and Stripe- 2004	1991 ADA Standards
North Laurel Campus- Building 1	All the school can provide is acquired- 2000	1991 ADA Standards
North Laurel Campus- Building 2	Original Construction- 2002	1991 ADA Standards
North Laurel Campus- Building 3	Original Construction- 2010	1991 ADA Standards
North Laurel Parking Lots A-E	Seal and Stripe July- 2017	2010 ADA Standards
Laurel South	Original Construction-1971	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Laurel South Parking Lot	Seal and Stripe July 2017	2010 ADA Standards
Somerset North- Meece Hall	Original construction 1965	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Somerset North- Meece Hall	Alteration Culinary Lab- 2018	2010 ADA Standards
Somerset North- Meece Hall	Alteration Restrooms-2012	2010 ADA Standards
Somerset North-Stoner Hall	Original Construction-1965	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Somerset North- H.D Strunk Learning Center	Original Construction-1979	ANSI
Somerset North- H.D Strunk Learning Center	Alteration Library-2011	2010 ADA Standards
Somerset North-Cooper Hall	Original Construction-1985	ANSI
Somerset North-Blakley Building	Original Construction-2003	1991 ADA Standards
Somerset North-H Rogers Student Commons	Original Construction-2004	1991 ADA Standards
Somerset North- Parking Lots A-F	Seal and Stripe-July 2017	2010 ADA Standards
Somerset South- Building One	Original construction-1969	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Somerset South- Building One	Alteration Aircraft Paint Bay-2009	1991 ADA Standards

Somerset South- Building One	Alteration Industry Bay-2004	1991 ADA Standards
Somerset South- Building Two	Original Construction-1973	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.
Somerset South- Building Two	Alteration Workforce-2018	2010 ADA Standards
Somerset South- Building Two	Alteration Restrooms-2004	1991 ADA Standards
Somerset South- Building Four	Original Construction-1978	ANSI
Somerset South- Building Four	Alteration Cosmetology-2005	1991 ADA Standards
Somerset South- Building Five	Original Construction-1982	ANSI
Somerset South- Parking Lots A-D	Stripe and Seal- July 2017	2010 ADA Standards

The following chart outlines areas of inaccessibility at Somerset Community College.

Accessibility Violation	Applicable Standard	Required Corrective Action
Clinton Center Classroom 213- Paper towel (50 inches high) and soap dispenser (52 inches high) in the back of the classroom out of reach range.	Forward Reach. The maximum high forward reach allowed shall be 48 in. The minimum low forward reach is 15 in. 4.2.5 1991 ADA Standards	Have paper towel dispenser and soap dispenser within reach range. Unobstructed reach range 15 inches- 48 inches. Obstructed High Reach. Where a high forward reach is over an obstruction, The high forward reach shall be 48 inches maximum where the reach depth is 20 inches maximum. Where the reach depth exceeds 20 inches, the high forward reach shall be 44 inches maximum and the reach depth shall be 25 inches maximum. 2010 ADA Standards 308
Laurel North Building 1- Restrooms near room 156 Both restrooms had unwrapped pipes under the sink.	Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall

	under lavatories. 4.19.4 1991 ADA Standards	be no sharp or abrasive surfaces under lavatories and sinks 606.5 2010 ADA Standards
Laurel North Building 2- The AED by the bookstore bottom leading edge at 35 inches and protrudes 7 inches out into the circulation path	Objects projecting from walls with their leading edges between 27 in and 80 in above the finished floor shall protrude no more than 4 in into walks, halls, corridors, passageways, or aisles. 4.4.1 1991 ADA Standards.	Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches. 307 2010 ADA Standards
Laurel North Building 2- The sink (wash fountain) in room 227/226 Electricity Shop is not accessible, the water flow is operated by a foot pedal only.	Faucets shall comply with 4.27.4. Lever-operated, push-type, touch-type, or electronically controlled mechanisms are acceptable designs. 4.24.7 1991 ADA Standards	Controls for faucets shall comply with 309. Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds max. 606 and 309 2010 ADA Standards
Laurel North Building 3- In Pharmacy Tech majority of the medicine is out of reach range.	Max high forward reach is 48 inches. 4.2.5, 4.2.6 1991 ADA Standards	Have the medication within reach range. Forward unobstructed reach range 15 inches- 48 inches. 308 2010 ADA
Laurel North Building 3- In Pharmacy Tech the computer is on a counter that is taller than 34 inches.	Accessible tables and counters shall be from 28 into 34 in above the finish floor or ground. 4.32 1991 ADA Standards	Have a computer that is at an accessible-height. Work surfaces should be between 28-34 inches. 902.3 2010 ADA Standards
Laurel North Building 3- In Pharmacy Tech the transaction windows and computers at the transactions windows were higher than 34 inches	Accessible tables and counters shall be from 28 into 34 in above the finish floor or ground. 4.32 1991 ADA Standards	Have a computer that is at an accessible-height and provide an accessible area for transactions stimulations Work surfaces should be between 28-34 inches. 902.3 2010 ADA. Standards.

<p>Laurel North Building 3- The service windows/ counters on the first and second floors were higher than 36 inches.</p>	<p>A portion of the main counter which is a minimum of 36 in length shall be provided with a maximum height of 36 in. 7.2 1991 ADA Standards</p>	<p>A portion of the counter surface should 36 inches long minimum and 36 inches high maximum above the finish floor. 904 2010 ADA Standards</p>
<p>Laurel North Building 1 Parking lot- The signage with the International Symbol of Accessibility were lower than 60 inches measured from the bottom of the sign to the ground.</p>	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards</p>	<p>Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. 502 2010 ADA Standards</p>
<p>Laurel North Building 2 parking lot- the signage with the International Symbol of Accessibility were lower than 60 inches measured from the bottom of the sign to the ground</p>	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards</p>	<p>Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. 502 2010 ADA Standards</p>
<p>Laurel North Building 2- Parking lot- The accessible space by the post with the A sticker on it has a slope more than 1:48 (2%).</p>	<p>Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards</p>	<p>Correct the space so the slope is not more the 1:48 (2%) in any direction in any spot in the space.</p> <p>Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards</p>




<p>Laurel North Building 3 Parking Lot A- the four accessible spaces and access aisles closest to the door have a slope more than 1:48 going to the drain located in the accessible space.</p>	<p>Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards</p>	<p>Correct the spaces and the access aisles so the slope is not more than 1:48 (2%) in any direction in any spot in the space. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards</p>
<p>Laurel North Building 3 parking lot A -the four accessible spaces in the back of parking lot A.</p> <ol style="list-style-type: none"> 1) One did not have an International Symbol of Accessibility sign and the other three signs were lower than 60 inches measured from the bottom of the sign to the ground 2) The four accessible spaces had a slope of more than 1:48 (2%) 3) The four spaces at the top of the hill are not located on the shortest accessible route between parking and the building served. There are stairs between the spaces and building two preventing building two from being accessible from those spaces, and the spaces are on an accessible route to building three but not the shortest accessible route. 	<ol style="list-style-type: none"> 1) Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards 2) Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 	<ol style="list-style-type: none"> 1) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. 2010 ADA Standards 502 2) Have parking spaces with less than 2% slope in any direction in any spot in the space. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards 3) Move the accessible space to

	<p>shall be permitted 502 2010 ADA Standards</p> <p>3) Parking spaces that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance. 208 2010 ADA Standards</p>	<p>the shortest accessible route from the parking lot to an accessible entrance. 208 2010 ADA Standards</p>
<p>Laurel North Building 3- Parking in front of the building.</p> <p>1) The International Symbol of Accessibility signs are lower than 60 inches measured from the bottom of the sign to the ground.</p> <p>2) The accessible space furthest from the entrance had a slope of more than 1:48.</p>	<p>1 Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards</p> <p>2 Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 502 2010 ADA Standards</p>	<p>1 Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. 502 2010 ADA Standards.</p> <p>2 Correct the space so the slope is not more than 1:48 (2%) in any direction in any spot in the space.</p> <p>Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 502 2010 ADA Standards</p>
<p>Laurel South-All of the workshops have the wash fountains that the water flow was accessible by feet only.</p>	<p>Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.</p>	<p>Controls for faucets shall comply with 309. Operation. Operable parts shall be operable with one hand and shall not</p>

		require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds max. Alternatively, because the building is subject to the program access standard, Laurel South may designate an existing accessible space for classes being held in the workshops. 606 and 309 2010 ADA Standards.
Laurel South Classroom 213- the paper towel dispenser is out of reach range, over the sink higher than 48 inches.	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.	Have paper towels within reach range. Side reach ranges 15 inches min- 48 inches max. Obstructed high reach ranches where the depth exceeds 20 inches the high forwards reach shall be 44 inches max. 308 2010 ADA
Laurel South Classrooms 106,216,218, and 219- the paper towel dispenser is out of reach range	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.	Have paper towels within reach range. Forward reach ranges 15 inches min- 48 inches max 308 2010 ADA
Laurel South Restrooms -Not all the restrooms are accessible and there is no directional signage to the accessible restrooms.	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.	Install sign at the inaccessible restrooms that give directions to accessible restrooms. Signs with tactile characters shall be located 48" min above the ground and 60" max above the ground. These shall be located beside the door if possible or the nearest adjacent wall; must have 18" x 18" clear space in front of the tactile letters

		*Visual only signs shall be 40" min above the floor. 703.5.6 2010 ADA
Laurel South Parking Lot A- Three spaces did not have an International Symbol of Accessibility sign and the other four sign were lower than 60 inches measured from the bottom of the sign to the ground.	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 2010 ADA Standards 502.6	1) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. 2) Install signs at the proper height for three spaces that did not have parking space identification signs. 2010 ADA Standards 502
South Parking Lot B- One space did not have a have an International Symbol of Accessibility sign and one space the sign was not at least 60 inches high measured from the bottom of the sign to the ground.	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 2010 ADA Standards 502.6	Install an International Symbol of Accessibility sign and adjust the height of the International Symbol of Accessibility sign that is not high enough to be at least 60 inches high from the bottom of the sign to the ground. 2010 ADA Standards 502
South Laurel Parking Lot B- The three accessible space had a slope of more than 1:48 (2%).	Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 502 2010 ADA Standards	Correct the space so the slope is not more than 1:48 (2%) in any direction in any spot in the space. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 502 2010 ADA Standards

<p>Somerset North H Rogers building-The AED by admissions has a bottom leading edge at 48 inches and protrudes 7 inches out into the circulation path.</p>	<p>Objects projecting from walls with their leading edges between 27 in and 80 in above the finished floor shall protrude no more than 4 in into walks, halls, corridors, passageways, or aisles. 4.4.1 1991 ADA Standards.</p>	<p>Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches. 307 2010 ADA Standards</p>
<p>Somerset North H Rogers building- The main counter when you walk into financial aid for information is 42 inches high.</p>	<p>A portion of the main counter which is a minimum of 36 in in length shall be provided with a maximum height of 36 in. 7.2 1991 ADA Standards</p>	<p>A portion of the counter surface should 36 inches long minimum and 36 inches high maximum above the finish floor. 904 2010 ADA Standards</p>
<p>Somerset North H Rogers building- The counters in room 112 were 42 inches high. There was a self-pay kiosk in the corner. It was a computer on a desk with a chair. The chair at the desk prohibits the computer from being accessible.</p>	<p>A portion of the main counter which is a minimum of 36 in in length shall be provided with a maximum height of 36 in. 7.2 1991 ADA Standards</p>	<p>A portion of the counter surface should 36 inches long minimum and 36 inches high maximum above the finish floor. 904 2010 ADA Standards</p>
<p>Somerset North Blakely building- The AED by the 1st-floor restrooms area has a bottom leading edge at 45 inches and protrudes 7 inches out into the circulation path.</p>	<p>Objects projecting from walls with their leading edges between 27 in and 80 in above the finished floor shall protrude no more than 4 in into walks, halls, corridors, passageways, or aisles. 4.4.1 1991 ADA Standards</p>	<p>Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches. 307 2010 ADA Standards</p>
<p>Somerset North Stoner Hall- All restroom in the building have door widths of less than 32 inches. None of them are accessible to enter.</p>	<p>Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.</p>	<p>Widen at least one of the restrooms and make it a unisex restroom on an accessible route consistent with chapter 6 of the 2010 ADA standards, designate an existing accessible space for classes being held in the classroom However the school decides to handle the issues, the accessible signage needs to be removed from the restroom doors. If the school decides to widen a door and make the restrooms accessible, then accessible</p>

		signage should be placed for the accessible restroom.
<p>Somerset North Meece building- The women's restrooms had pipes exposed under the sink.</p> 	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards</p>
<p>Somerset North Meece building- Women's restroom the sanitary napkin disposal container is sitting on the grab bar in the accessible stall.</p> 	<p>The space between the grab bar and projecting objects above shall be 12 inches minimum. 609 2010 ADA Standards</p>	<p>Adjust the sanitary napkin disposal container height. The space between the grab bar and projecting objects above shall be 12 inches minimum. 609 2010 ADA Standards</p>
<p>Somerset North Meece building- The men's restrooms had pipes exposed under the sink.</p> 	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards</p>

<p>Somerset North Meece building- 139 Chemistry lab the tables and sink were 37 inches high. The soap dispenser and paper towels were out of reach range.</p>	<p>Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.</p>	<p>Lower the soap dispenser and paper towels into reach range described in 308 and have accessible tables and an accessible sink. 28 inches min- 34 inches max. 902 2010 ADA Standards Alternatively, because the building is subject to the program access standard, Somerset North may designate an existing accessible space for classes being held in the classroom.</p>
<p>Somerset North Meece building- 135 Biology lab sink is 36 inches tall.</p>	<p>Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.</p>	<p>Have an accessible sink. 28 inches min-34 inches max. 902 2010 ADA Alternatively, because the building is subject to the program access standard, Somerset North may designate an existing accessible space for classes being held in the classroom.</p>
<p>Somerset North Meece building- The AED between the restrooms has a leading-edge higher than 27 inches and protrudes 7 inches out into the circulation path</p>	<p>Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.</p>	<p>Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches. 307 2010 ADA Standards</p>
<p>Somerset North Cooper building- The drains under the men's and women's restrooms are not covered or insulated.</p>	<p>Drain pipes and hot-water pipes under a lavatory should be covered or insulated. 5.6.3 ANSI</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards</p>

<p>Somerset North Parking Lot C</p> <p>1) The two accessible space in front of Stoner Hall had a slope of more than 1:48 (2%).</p> <p>2) The two International Symbol of Accessibility signs were not at least 60 inches high from the bottom of the sign to the ground.</p>	<p>1) Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards</p> <p>2) Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards</p>	<p>1) Correct the space so the slope is not more than 1:48 (2%) in any direction in any spot in the space.</p> <p>Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted 502 2010 ADA Standards</p> <p>2) Raise the International Symbol of Accessibility signs to comply with 703. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards</p>
<p>Somerset North Parking Lot D- The three International Symbol of Accessibility signs were not at least 60 inches high from the bottom of the sign to the ground.</p>	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the</p>	<p>Raise the International Symbol of Accessibility signs to comply with 703. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs</p>

	sign. 502.6 2010 ADA Standards	identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards
Somerset North Parking Lot B- The six International Symbol of Accessibility signs were not at least 60 inches high from the bottom of the sign to the ground.	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards	Raise the International Symbol of Accessibility signs to comply with 703. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards
Somerset North Parking Lot A- The six International Symbol of Accessibility signs were at least 60 inches high from the bottom of the sign to the ground.	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards	Raise the International Symbol of Accessibility signs to comply with 703. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the

		finish floor or ground surface measured to the bottom of the sign.502.6 2010 ADA Standards
Somerset South Building One- All of the workshops have the wash fountains that the water flow is operated by a foot pedal only.	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.	Controls for faucets shall comply with 309. Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds max. 606 and 309 2010 ADA Standards. Alternatively, because the building is subject to the program access standard, Somerset may designate an existing accessible space for classes
Somerset South Building Two- The men's restrooms the pipes under the sink were not wrapped or covered.	Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories. 4.19.4 1991 ADA Standards	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards
Somerset South Building Two- The AED in the common area has a bottom leading edge at 38 inches and protrudes 7 inches out into the circulation path.	Program Access. 34 C.F.R. § 104.22; 28 C.F.R. § 35.150.	Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches. 307. 2010 ADA Standards
Somerset South Building Four- The closest entrance to the building from the accessible spaces is not accessible. The only way for someone unable to use stairs to enter the buildings is to walk on the uneven	At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site and Ground	Accessible routes shall comply with 402. 2010 ADA Standards

<p>pavement past the front entrance, up a steep incline to the back of the building.</p>	<p>surfaces along accessible routes and inaccessible spaces shall comply with 4.5.4.3.2 1991 ADA Standards</p>	
<p>Somerset South Building Four- In the restroom, the one side of the sink that did have protected pipes were blocked by a trashcan.</p>	<p>The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 in by 48 in. 4.2.4 1991 ADA Standards</p>	<p>The clear floor or ground space shall be 30 minimum by 48 inches minimum. 305.3 2010 ADA Standards</p>
<p>Somerset South Building Five- The sink in the women's restrooms in not wrapped or covered.</p>	<p>Drain pipes and hot-water pipes under a lavatory should be covered or insulated. 5.6.3 ANSI</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks. 606 2010 ADA Standards</p>
<p>Somerset South Parking- The access aisle and the van accessible space in front of the diesel mechanics are not level. (building 5) The two accessible spaces in front of the cosmetology building had a slope of more than 1:48 going to the drain in the accessible space. (building 4)</p>	<p>Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. 502.4 2010 ADA Standards</p>	<p>Correct the space so the slope is not more than 1:48 (2%) in any direction in any spot in the space. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. 502.4 2010 ADA Standards</p>
<p>Somerset South Parking- The International Symbol of Accessibility signs were not at the correct height, they were not at least 60 inches high from the bottom of the sign to the ground.</p>	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. 502.6 2010 ADA Standards</p>	<p>Raise the International Symbol of Accessibility signs to comply with 703. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the</p>

Picture of North Laurel parking lot between building 2 and 3



IV. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; and 34 C.F.R. § 106.33

Summary of Findings and Analysis: Somerset Community College does not have locker rooms or showers for students, thus, there was no evidence of a violation.

Required Corrective Action(s): None.

V. Housing in Postsecondary Institutions

Applicable Requirements: *Guidelines* Section VI.C; 34 C.F.R. § 100.3(b), 104.45, and 106.32

Summary of Findings and Analysis: Somerset Community College does not provide housing, thus, there was no evidence of a violation.

Required Corrective Action(s): None.

VI. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N; 34 C.F.R. §§ 104.4(a), 104.43 and 104.44; 28 C.F.R. §§ 35.130, and 35.160-35.163

Summary of Findings and Analysis: Kentucky Department of Education reviewed documents provided by Somerset Community College and reviewed the college's procedures for serving students with disabilities. After interviewing students and staff and reviewing the documentation provided there was no evidence that the school has not been making accommodations for staff and students. Thus, there was no evidence of a violation

Required Corrective Action(s): None

VII. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), 104.46, and 106.37

Summary of Findings and Analysis: Somerset Community College provided and assisted in administering financial assistance to its students. Kentucky Department of Education reviewed the information provided to students on its website as well as at the Financial Aid Office. Kentucky Department of Education also reviewed the process and procedures established in the Financial Aid Office.

Schools may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination. On the SCC website under scholarship offerings, the KCTCS John T. Smith scholarship is listed with the criteria of 1. Financial Need 2. Academic Record 3. Achievement in Extracurricular Activities 4. Racial Status. The description of the scholarship explains Dr. John T. Smith was the first African American to receive a doctoral degree from the University of Kentucky and served as the first African American community college president in Kentucky. Just reading about who Dr. John T. Smith was and seeing Racial Status in the criteria does not mean that the school is using racial status to grant the scholarship to a minority student to overcome the effects of past discrimination.

Required Corrective Action(s): Alter the wording on the John. T Smith scholarship for the racial requirements.

VIII. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B; 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), 104.46, 106.31, and 106.38(a)

Summary of Findings and Analysis: Kentucky Department of Education reviewed Somerset Community College's application for work-study. Somerset Community College's registration for employers to post offerings for full-time, Part-time, Internship/Co-op job opportunities. The registration contained an assurance that the employer or other sponsor does not discriminate against students on the basis of race, color, national origin, sex, religion, sexual orientation, veteran status or disability. Application materials included the college's nondiscrimination notice. Based on interviews with students, there was no evidence that students had been limited from internship or employment opportunities on the basis of their race, color, national origin, sex, or disability. Thus, there was no evidence of a violation.

Required Corrective Action(s): None.

IX. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14, and 106.51-106.61

Summary of Findings and Analysis: In addition to interviewing instructors and administrators, Kentucky Department of Education reviewed job postings for staff and faculty positions. All of these postings contained a nondiscrimination notice. Kentucky Department of Education also reviewed the college's salary policies. There was no evidence of a violation.

Required Corrective Action(s): None.

*The methods of administration review likely did not see all situations that may be out of compliance during the short review. This review's findings only address the subject's compliance with certain and specific statutory and regulatory provisions. This method of administration review only addresses Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106. Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35 and the Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs. A finding of compliance is limited to **only** those sections of statutes and regulations specifically examined in this report and should not be interpreted as a blanket statement of compliance with all areas of the mentioned statutes, regulations or other applicable law.*

On-Site Visit Conducted
 December 13, 2018
 LOF emailed January 2, 2019
 VCP due by February 18, 2019

Voluntary Compliance Plan
 Boyd County School District

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
A	Add and provides equal access to the Boy Scouts and other designated youth groups" to the continuous notices posted around the school and everything disseminated to students, staff and parents. 34 C.F.R. Section 108.9	Employee Handbook and Student Handbook will be updated to include "provides equal access to the Boy Scouts and other designated youth groups."	Matt Spade, District Administrator - Employee Handbook and Jacob Meade, Assistant Principal Student Handbook	Aug-19	Updated documents will be sent at the time of targeted completion date or sooner. On-line Curriculum Guide may be viewed as well by this date.
B	Remove the female only sections from the course catalog for introduction to construction tech, floor and wall framing, maintenance and light repair sec A & B, blueprint reading for welding, and basic welding. Guidelines § 106.34	All single-sex courses have been removed from the course catalog.	Doug Deborde, Director of BCCTEC and Counselors, BCHS & BCCTEC	Feb-19	Updated documents attached to this report. On-line Curriculum Guide may be viewed as well.
C	Correct the height of the International Symbol of Accessibility at BCHS and install signs at BCCTEC. Must be at least 60 inches high. 2010 ADA standards 502.6	Handicapped parking signs will be raised to the specified height of 60 inches at BCHS and installed at BCCTEC.	Bob Higginbotham Director	Aug-19	Materials have been ordered. Once acquired and installed, pictures will be taken and added to an addendum to this report and submitted.

On-Site Visit Conducted
December 13, 2018
LOF emailed January 2, 2019
VCP due by February 18, 2019

Voluntary Compliance Plan
Boyd County School District

Signed by Appropriate Person who
has authority to bind the subrecipient
to taking the necessary corrective
action:

Dara Su Stevens-Williams

Printed Name:

Dara Su Stevens-Williams

Date:

2-18-19

Voluntary Compliance Plan must be submitted by February 18, 2019

Please submit to:

Amy.Ortwein@Education.KY.GOV

or the MOA SharePoint site

On-Site Visit Conducted
 January 22-23, 2019
 LOF emailed January 30, 2019
 VCP due by March 1, 2019

Voluntary Compliance Plan
 Grayson County School District

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
A	All continuous nondiscrimination notices need to have the "and provides equal access to the Boy Scouts and other designated youth groups". (34 C.F.R. Section 108.9)	Information will be added to the student handbook and course catalog.	Josh Baldwin	8/1/2019	Items will be emailed to Mrs. Ortwein and placed on the school webpage.
B	Include the contact information for the Title IX and 504 Coordinator on all continuous nondiscrimination notices. (34 C.F.R. § 106.8(a))	Information will be added to the student handbook.	Josh Baldwin	8/1/2019	Items will be emailed to Mrs. Ortwein and placed on the school webpage.
C	The continuous nondiscrimination notice needs to be included in all major school publications for example: school newsletter, brochures, course catalog, etc. (34 C.F.R. 55 104.8)	Information will be added to the student handbook and course catalog.	Josh Baldwin	8/1/2019	Items will be emailed to Mrs. Ortwein and placed on the school webpage.

On-Site Visit Conducted
 January 22-23, 2019
 LOF emailed January 30, 2019
 VCP due by March 1, 2019

Voluntary Compliance Plan
 Grayson County School District

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
D	Have the school's Title IX and Section 504/Title II coordinators information in the student handbook. (guidelines section IV.O)	Information will be added to the student handbook.	Josh Baldwin	8/1/2019	Items will be emailed to Mrs. Ortwein and placed on the school webpage.
E	Have the information where the grievance policy and procedures can be found in the student handbook (34 C.F.R. §§ 104.7(b))	Information will be added to the student handbook.	Josh Baldwin	8/1/2019	Items will be emailed to Mrs. Ortwein and placed on the school webpage.
F	Eliminate and prevent any steering of students into or away from particular CTE programs on the basis of disability. (Guidelines Sections V.A and B)	Mr. Baldwin will meet with the counseling department to make corrections.	Josh Baldwin	3/1/2019	Agenda and minutes from the meeting with the counseling department. The items will be emailed to Mrs. Ortwein.

On-Site Visit Conducted

January 22-23, 2019

LOF emailed January 30, 2019

VCP due by March 1, 2019

**Voluntary Compliance Plan
Grayson County School District**

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
G	At Grayson County High School have the correct number of accessible parking. 9 accessible spots and 2 of them must be van accessible. (2010 ADA 208.2)	The correct number of spots will be added.	Leonard Dudgeon	8/1/2019	Pictures will be emailed to Mrs. Ortwein.
H	The symbol of accessibility signs at Grayson County Highschool and Grayson County Technology Center shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign. Van accessible spot shall contain the designation "van accessible". (2010 ADA 502.6)	New signs and posts will be placed at the appropriate height.	Leonard Dudgeon	8/1/2019	Pictures will be emailed to Mrs. Ortwein.

On-Site Visit Conducted
January 22-23, 2019

Voluntary Compliance Plan
Grayson County School District

LOF emailed January 30, 2019
VCP due by March 1, 2019

I	Classrooms 32,26,25,17,15,13,12,10,7,6,3,2, and 1 need to have the doors adjusted so it requires less than 5 pounds of pressure to open the doors. (UFAS 4.13.11).	Doors will be adjusted to 5 lbs maximum.	Leonard Dudgeon	8/1/2019	Pictures with a scale used to demonstrate the appropriate pressure.
---	---	---	-----------------	----------	--

On-Site Visit Conducted
January 22-23, 2019
LOF emailed January 30, 2019
VCP due by March 1, 2019

Voluntary Compliance Plan
Grayson County School District

Signed by Appropriate Person who
has authority to bind the
subrecipient to taking the
necessary corrective action:



Printed Name:

Todd Johnston

Date:

2/18/19

Voluntary Compliance Plan must be submitted by March 1, 2019

Please submit to:

Amy.Ortwein@Education.KY.GOV
or the MOA SharePoint site

On-Site Visit Conducted
February 12-13, 2019

Voluntary Compliance Plan
Carter County School District

LOF emailed February 27, 2019
VCP due by March 29, 2019

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
A	All continuous nondiscrimination notices need to have the "and provides equal access to the Boy Scouts and other designated youth groups".	Add required language to the nondiscrimination notice.	Donald Damron	5/1/2019	Email confirmation statement and supporting evidence on or before 5-1-19.
B	The continuous nondiscrimination notice needs to be included in all major school publications for example: school newsletter, brochures, course catalog, etc.	Include revised nondiscrimination notice on websites, publications and handbooks.	Donald Damron and Principals Kelly Moore, Karen Tackett, and Mary Lou Deharte	8/1/2019	Email confirmation statement and supporting evidence on or before 8-1-19.
C	Include the contact information for the Title IX and 504 Coordinator on student handbooks, all major school publications, and each school's website.	Include Title IX/504 contact information on websites, publications and handbooks.	Donald Damron and Principals Kelly Moore, Karen Tackett, and Mary Lou Deharte	8/1/2019	Email confirmation statement and supporting evidence on or before 8-1-19.

On-Site Visit Conducted
February 12-13, 2019

Voluntary Compliance Plan
Carter County School District

LOF emailed February 27, 2019
VCP due by March 29, 2019

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
D	Have the information where the grievance policy and procedures can be found in each school's teacher handbook	Add the "Grievance" policy and procedure language to any published teacher handbook.	Donald Damron and Principals Kelly Moore, Karen Tackett, and Mary Lou Deharte	8/1/2019	Email confirmation statement and supporting evidence on or before 8-1-19.
E	At East Carter High School pipes in men's and women's restrooms by the gym need to be covered. (2010 ADA 603)	Cover ECHS gym restroom pipes as required by statute.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.
F	At East Carter High School men's and women's restrooms by the gym need to have mirrors installed that the bottom on the mirror is not higher than 40 inches from the floor. (2010 ADA 603.)	Correct the mirror height in the ECHS gym restroom as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.

On-Site Visit Conducted
 February 12-13, 2019
 LOF emailed February 27, 2019
 VCP due by March 29, 2019

Voluntary Compliance Plan
 Carter County School District

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
G	At East Carter High School the men's and women's restroom by the gym need to have paper towel dispensers that are not higher than 40 inches from the floor. (2010 ADA 603)	Correct the paper towel dispenser height in the ECHS gym restroom as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.
H	At East Carter High School install directional signage displaying the international symbol of accessibility to direct individuals with disabilities to the male and female restrooms. (2010 ADA 703.1 and 703.	Install disability directional signage for all ECHS restrooms as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.

On-Site Visit Conducted
 February 12-13, 2019
 LOF emailed February 27, 2019
 MCP due by March 29, 2019

Voluntary Compliance Plan
 Carter County School District

I	<p>East Carter High School parking lot needs 2 van accessible spots that are labeled van accessible. The symbol of accessibility signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign. (201 ADA 502)</p>	<p>Properly label two parking spots at ECHS to serve as "Van Accessible" spots in accordance with statute.</p>	<p>Ronnie Cooley and Maintenance Staff</p>	<p>5/1/2019</p>	<p>Email confirmation statement on or before 5-1-19.</p>
J	<p>At West Carter High School pipes in men's and women's restrooms by the gym need to be covered. (2010 ADA 603)</p>	<p>Cover WCHS gym restroom pipes as required by statute.</p>	<p>Ronnie Cooley and Maintenance Staff</p>	<p>5/1/2019</p>	<p>Email confirmation statement on or before 5-1-19.</p>
K	<p>At West Carter High School men's and women's restrooms by the gym need to have mirrors installed that the bottom on the mirror is not higher than 40 inches from the floor. (2010 ADA 603.)</p>	<p>Correct the mirror height in the WCHS gym restroom as required.</p>	<p>Ronnie Cooley and Maintenance Staff</p>	<p>5/1/2019</p>	<p>Email confirmation statement on or before 5-1-19.</p>

On-Site Visit Conducted
February 12-13, 2019
LOF emailed February 27, 2019
VCP due by March 29, 2019

Voluntary Compliance Plan
Carter County School District

L	At West Carter High School the men's and women's restroom by the gym need to have paper towel dispensers that are not higher than 40 inches from the floor. (2010 ADA 603)	Correct the paper towel dispenser height in the WCHS gym restroom as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.
M	At West Carter High School the men's and women's restroom by the gym need to have soap dispensers that are not higher than 40 inches from the floor. (2010 ADA 603)	Correct the soap dispenser height in the WCHS gym restroom as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.
N	At West Carter High School install directional signage displaying the international symbol of accessibility to direct individuals with disabilities to the male and female restrooms. (2010 ADA 703.1 and 703.	Install disability directional signage for all WCHS restrooms as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.

On-Site Visit Conducted
February 12-13, 2019
LOF emailed February 27, 2019
VCP due by March 29, 2019

Voluntary Compliance Plan
Carter County School District

O	Install an accessible microwave in the family and consumer science classroom at West Carter High School. (2010 ADA 308.2)	Purchase and install microwave in the WCHS FCS classroom as required.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.
P	West Carter High School parking lot needs 2 van accessible spots that are labeled van accessible. The symbol of accessibility signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign. (201 ADA 502)	Properly label two parking spots at WCHS to serve as "Van Accessible" spots in accordance with statute.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.
Q	Carter County Career and Technical parking lot need to install symbol of accessibility signs. The symbol of accessibility signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign. The van accessible spot needs to be labeled van accessible. (201 ADA 502)	Install proper signage for disability parking at the CCCTC according to requirements.	Ronnie Cooley and Maintenance Staff	5/1/2019	Email confirmation statement on or before 5-1-19.

On-Site Visit Conducted
February 12-13, 2019
LOF emailed February 27, 2019
VCP due by March 29, 2019

Voluntary Compliance Plan
Carter County School District

Signed by Appropriate Person who
has authority to bind the
subrecipient to taking the
necessary corrective action:



Printed Name: Donald M. Damron, Personnel Director

Date: 3/18/2019

Voluntary Compliance Plan must be submitted by March 29, 2019

Please submit to:
Amy.Ortwein@Education.KY.GOV
or the MOA SharePoint site

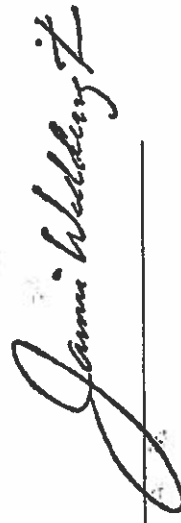
Item	Finding/Violation	Remedy	Expected Date of Completion (month and year)	Date of Completion (month and year)	Person Responsible	Supporting Documentation Provided	Date of Completion
A.	Include a continuous notice of nondiscrimination on all major school publications, all recruitment materials, and Foster Meade CTC website. Notice must include that the school does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs or activities and provides equal access to the Boys Scouts and other designated youth groups.	Notice will be included in all publications including the newspaper, Student Code of Conduct and the Employee Handbook.	19-Aug		Tiffany Felty; Brenda Box		
B.	Titles and contact information for Lewis County School District's Title IX and Section 504/Title II coordinators need to be on each schools website and published in all major school publications.	Tiffany Felty and Brenda Box will be the new Title IX coordinators. This information will be included in the employee handbook, student code of conduct, and is included on all websites.	19-Aug	19-Apr	Tiffany Felty; Brenda Box; Greg McCane		4/19/2019

					<p>As indicated by reviewer, Title IX trainings are not readily accessible. The district will search for trainings and complete when they are located or offered.</p>	<p>May, 2020</p>		<p>Felty/Box</p>			
<p>C.</p>	<p>Title IX coordinator needs to have Title IX training other than how it pertains to high school athletics. Some examples of Title IX obligations are: recruitment, admissions, athletics, and counseling; sex-based harassment; treatment of pregnant and parenting students; discipline; and employment.</p>			<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>Weddington</p>		<p>7/31/2019</p>	<p>7/31/2019</p>
<p>D.</p>	<p>The Title IX coordinator should not be someone who has a potentially conflicting role (i.e. superintendent, principle, or athletic director.)</p>			<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>Tiffany Felty and Brenda Box have been designated as Title IX coordinators.</p>		<p>7/31/2019</p>	<p>7/31/2019</p>
<p>E.</p>	<p>Designate one accessible spot as van accessible and label it van accessible. Van accessible spots must be 132" wide and have an adjacent access aisle 60" minimum width or the spot can be 96" minimum with the access aisle is 96" wide.</p>			<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>Brammell/Maintenance</p>	<p>See attached pictures</p>	<p>7/31/2019</p>	<p>7/31/2019</p>
<p>F.</p>	<p>Have the accessibility signs 60 inches high measured from the bottom of the sign to the ground.</p>			<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>19-Aug</p>	<p>Brammell/Maintenance</p>	<p>See attached pictures</p>	<p>7/31/2019</p>	<p>7/31/2019</p>

On-Site Visit Conducted: March 19, 2019
 LOF mailed out: April 8, 2019
 VCP due by: May 8, 2019

Voluntary Compliance Plan
 Lewis County School District

E.	and have an adjacent access aisle 60" minimum width or the spot can be 96" minimum with the access aisle is 96" wide.	Spot will be designated at FMCTC	19-Aug	ance	
F.	Have the accessibility signs 60 inches high measured from the bottom of the sign to the ground.	Signs will be adjusted.	19-Aug	Brammell/Maintenance	
G.	The pipes in the restrooms need to be insulated or configured to protect against contact	Pipes will be protected	19-Aug	Brammell/Maintenance	See attached pictures
H.	Paper towel dispensers need to be between 15 inches and 48 inches.	Paper towel dispensers will be adjusted to appropriate height.	19-Aug	Brammell/Maintenance	



Sign by appropriate person who has authority to bind the subrecipient to taking the necessary corrective action:


Date: 5/8/19

Please submit to:
 Amy Ortwein
 300 Sower Blvd 4th Floor
 Frankfort, KY 40601
 Email Address:
Amy.Ortwein@Education.Ky.Edu

Item	Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date (Month and Year)	How Completion of Remedy will be Reported and Verified to State Agency
A	Correct all nondiscrimination notices to have the correct names and titles for contact information.	Title II and Title IX will be corrected in all statements to reflect Tiffany Anderson as the coordinator	Shana Bailey, HS Admin	July 31, 2019	<u>Updated Non-Discrimination Notice</u>
B	Include the district's nondiscrimination notice on all major publications, including all recruiting material, and copy material.	Verify that the correct statements are in all publications.	Shana Bailey, HS Admin	July 31, 2019	<u>Clay City Times Publication</u>
C	Have an accessible counter area in classrooms 10 and 12 or relocate the classrooms to a fully accessible area. Accessible counters should be between 28 inches and 34 inches tall from the top of the counter to the floor. The counter must provide appropriate knee and toe clearance.	Maintenance will remove and replace sections of counters to meet high requirements. We will place International Symbol of Accessibility sign on specific area to indicate handicap access	Rodney Barnes, collaborate with Mr. Brewer and S. Bailey	April 30, 2020	Pictures will be taken of new areas, along with tape measurement to demonstrate correct height access.

	access to a car to drive to work each day question.		
On the Cooperative Education Program student evaluation form remove the line on the chart where students are to be graded on their personal appearance.	Remove these statements from the form.	Shana Bailey, HS Admin	August 13, 2019 <u>Corrected Application</u>

Signed by Appropriate Person who has authority to bind the subrecipient to taking the necessary corrective action:



 Anthony Orr

 8/9/19

Printed Name:

Date:

Voluntary Compliance Plan must be submitted by August 9, 2019

Please submit to:

Amy.Ortwein@Education.KY.GOV

or the MOA SharePoint site

This review's findings only address the subject's compliance with certain and specific statutory and regulatory provisions. This method of administration review only addresses Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106. Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35 and the Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs. A finding of compliance is limited to only those sections of statutes and regulations specifically examined in this report and should not be interpreted as a blanket statement of compliance with all areas of the mentioned statutes, regulations or other applicable law.

On-Site Visit Conducted: July 8, 15-16, 23-25, 2019
 LOF emailed: August 29, 2019
 VCP due by September 30, 2019

Somerset Community College
 Voluntary Compliance Plan

This VCP addresses the findings described in Kentucky Department of Education's Letter of Findings, dated August 29, 2019, which summarized the agency's on-site review of Somerset Community College conducted on July 8, 15-16, 23-25, 2019

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Include the sexual misconduct procedures in the KCTCS Code of Student Conduct or correct the link in the document.	The link has been restored.	Tracy Casada	8/30/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Clinton Center Classroom 213- Have paper towel dispenser and soap dispenser within reach range.	Paper towel and soap dispensers have been lowered to ADA standards.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Laurel North Building 1- Restrooms near room 156. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.	Pipes have been insulated.	John Roberts	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Laurel North Building 2- Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches.	AED has been relocated out of path of travel.	John Roberts	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Laurel North Building 2- 227/226 Electricity Shop. Have wash fountains that are operational with one hand.	ADA compliant portable wash stations will be purchased and available to students who need to use them based on disability.	Sherry Warren	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	
Laurel North Building 3- In Pharmacy Tech have the medicine within reach range.	Once disabled student identified, move medications to lower shelving. Shelving is adjustable in the lab.	Nancy Powell/Lorrinda Merritt	As needed	We can report this when a student is identified that needs these accommodations.	
Laurel North Building 3- In Pharmacy Tech have a computer that is at an accessible height.	Once disabled student identified, move computer to accessible height.	Nancy Powell/Lorrinda Merritt	As needed	We can report this when a student is identified that needs these accommodations.	
Laurel North Building 3- In Pharmacy Tech provide an accessible area for transactions stimulations.	Once disabled student identified, move transaction stimulations to accessible area.	Nancy Powell/Lorrinda Merritt	As needed	We can report this when a student is identified that needs these accommodations.	
Laurel North Building 3- have a portion of counter surface 36 inches long minimum and 36 inches high max available at the service windows and counters on the first and second floors.	Install additional lower shelf and post signage stating ADA assistance is available	John Roberts & Sherry Warren	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Laurel North Building 1 Parking lot- Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	Signage has been adjusted to meet ADA standard.	John Roberts	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Laurel North Building 2 parking lot- Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	Signage has been adjusted to meet ADA standard.	John Roberts	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Laurel North Building 2 parking lot- Correct the slope in the by the post with the A sticker so the slope is not more than 1:48 in any direction in any spot in the space.	The space will be relocated.	John Roberts	November 2019	Completed	
Laurel North Building 3 parking lot A- Correct the space so the slope is not more the 1:48 (2%) in any direction in any spot in the space.	KCTCS will submit for funding on the 6-year Capital Plan to correct to space.	Larry Abbott Jill Meece	February 2021	Copy of the section where the funding was requested for the parking lot correction will be submitted to State Agency.	

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
<p>Laurel North Building 3 parking lot</p> <p>A- 1) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.</p> <p>2) Have accessible parking spaces with less than 2% slope in any direction in any spot in the space</p> <p>3) Move the accessible space to the shortest accessible route from the parking lot to an accessible entrance.</p>	<p>1.) Signage has been adjusted to meet ADA standard.</p> <p>2.) KCTCS will submit for funding on the 6-year Capital Plan to correct to space.</p> <p>3.) KCTCS will submit for funding on the 6-year Capital Plan to correct to space.</p>	<p>John Roberts</p> <p>Larry Abbott Jill Meece</p> <p>Larry Abbott Jill Meece</p>	<p>1.)10/31/19</p> <p>2.) February 2021</p> <p>3) February 2021</p>	<p>Follow up report issued 12/31/2019 to State Agency.</p> <p>2) Copy of the section where the funding was requested for the parking lot correction will be submitted to State Agency.</p> <p>3) Copy of the section where the funding was requested for the parking lot correction will be submitted to State Agency.</p>	<p>1.) Complete</p>
<p>Laurel North Building 3- Parking in front of the building.</p> <p>1) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.</p> <p>2) Correct the space so the slope is not more than 1:48 (2%) in any</p>	<p>1.) Signage has been adjusted to meet ADA standard.</p> <p>2.) Space will be converted into regular parking space</p>	<p>John Roberts</p> <p>John Roberts</p>	<p>1.)10/31/19</p> <p>2.) November 2019</p>	<p>Follow up report issued 12/31/2019 to State Agency.</p> <p>Completed, will be included in follow up report</p>	<p>1.) Complete</p>

On-Site Visit Conducted: July 8, 15-16, 23-25, 2019
 LOF emailed: August 29, 2019
 VCP due by September 30, 2019

Somerset Community College
 Voluntary Compliance Plan

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
direction in any spot in the accessible space furthest from the entrance.					
Laurel South- Have wash fountains that are operational with one hand or designate an existing accessible space for classes being held in the workshops.	ADA compliant portable wash stations will be purchased and available to students who need to use them based on disability.	Sherry Warren	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	
Laurel South Classroom 213- Have paper towels within reach range. Side reach ranges 15 inches min- 48 inches max. Obstructed high reach ranches where the depth exceeds 20 inches the high forwards reach shall be 44 inches max.	Paper towels have been adjusted to meet ADA standard.	John Roberts	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Laurel South Classrooms 106,216,218, and 219- Have paper towels within reach range. Forward reach ranges 15 inches min- 48 inches max.	Paper towels have been adjusted to meet ADA standard.	John Roberts	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
<p>Laurel South Restrooms- Install sign at the inaccessible restrooms that give directions to accessible restrooms. Signs with tactile characters shall be located 48" min above the ground and 60" max above the ground. These shall be located beside the door if possible or the nearest adjacent wall; must have 18" x 18" clear space in front of the tactile letters.</p>	<p>Signs have been purchased and installed.</p>	<p>Sherry Warren & John Roberts</p>	<p>10/31/2019</p>	<p>Follow up report issued 12/31/2019 to State Agency.</p>	<p>Complete</p>
<p>Laurel South Parking Lot A- 1) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground. 2) Install signs at the proper height for three spaces that did not have parking space identification signs.</p>	<p>1.) Signage has been adjusted to meet ADA standard 2.) Signage has been installed.</p>	<p>John Roberts John Roberts & Sherry Warren</p>	<p>10/31/2019 10/31/2019</p>	<p>Follow up report issued 12/31/2019 to State Agency. Follow up report issued 12/31/2019 to State Agency.</p>	<p>1.) Complete 2.) Complete</p>
<p>Laurel South Parking Lot B- 1) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high</p>	<p>1.) Signage has been adjusted to meet ADA standard.</p>	<p>John Roberts</p>	<p>10/31/2019</p>		<p>1.) Complete</p>

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
<p>from the bottom of the sign to the ground. 2) Install sign at the proper height for space that did not have a parking space identification sign.</p>	<p>2.) Signage has been installed.</p>	<p>John Roberts & Sherry Warren</p>	<p>10/31/2019</p>	<p>Follow up report issued 12/31/2019 to State Agency. Follow up report issued 12/31/2019 to State Agency.</p>	<p>2.) Complete</p>
<p>South Laurel Parking Lot B- Correct the space so the slope is not more than 1:48 (2%) in any direction in any spot in the space.</p>	<p>Spaces will be relocated.</p>	<p>John Roberts</p>	<p>November 2019</p>	<p>Spaces Completed will be included in follow up report</p>	
<p>Somerset North H Rogers building- Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches.</p>	<p>Floor shelving has been placed under the AED.</p>	<p>Paul Hall</p>	<p>10/31/2019</p>	<p>Follow up report issued 12/31/2019 to State Agency.</p>	<p>Complete</p>
<p>Somerset North H Rogers building- A portion of the counter surface for financial aid should 36 inches long minimum and 36 inches high maximum above the finish floor.</p>	<p>Install additional lower shelf and post signage stating ADA assistance is available</p>	<p>Paul Hall & Sherry Warren</p>	<p>10/31/2019</p>	<p>Follow up report issued 12/31/2019 to State Agency.</p>	

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Somerset North H Rogers building- A portion of the counter surface in room 112 should 36 inches long minimum and 36 inches high maximum above the finish floor.	Install additional lower shelf and post signage stating ADA assistance is available	Paul Hall & Sherry Warren	12/31/2019	Follow up report issued 12/31/2019 to State Agency.	
Somerset North Blakely building- Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches.	Floor shelving has been placed under the AED.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset North Stoner Hall- Have an accessible restroom OR have an accessible space for classes being held in Stoner Hall. Remove the accessible signage from the restrooms, until a restroom is altered to become accessible.	Signage has been changed to designate ADA accessible restroom location and accessible signage has been removed. The four classes offered in Stoner Hall are available on-line, SCC will submit ADA renovation request to correct the Stoner Hall restrooms on the 6 year Capital Plan.	Paul Hall & Sherry Warren	10/31/2019 February 2021	Follow up report issued 12/31/2019 to State Agency. Copy of the section where the funding was requested for the restroom correction will be submitted to State Agency.	Complete
Somerset North Meece building- In the women's restroom insulate or otherwise configure water supply	Pipes have been insulated.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
and drain pipes under sinks to protect against contact.					
Somerset North Meece building- In the women's restroom adjust the sanitary napkin disposal container height. The space between the grab bar and projecting objects above shall be 12 inches minimum.	Sanitary napkin disposal has been moved to appropriate ADA location.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset North Meece building- In the men's restroom insulate or otherwise configure water supply and drain pipes under sinks to protect against contact.	Pipes have been insulated.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset North Meece building- 139 Chemistry Lab- Lower the soap dispenser and paper towels into reach range or designate an existing accessible space for classes being held in the classroom	Add soap dispenser and paper towels to be used concurrently with portable wash stations.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	
Somerset North Meece building- 139 Chemistry Lab- have accessible tables and an accessible sink. 28 inches min- 34 inches max Or	ADA compliant portable wash stations will be purchased and	Sherry Warren	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
designate an existing accessible space for classes being held in the classroom.	available to students who need to use them based on disability. ADA accessible tables will be provided as needed.				
Somerset North Meece building- 135 Biology lab- Have an accessible sink. 28 inches min- 34 inches max or designate an existing accessible space for classes being held in the classroom.	ADA compliant portable wash stations will be purchased and available to students who need to use them based on disability.	Sherry Warren	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	
Somerset North Meece building- Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches.	Floor shelving has been placed under the AED.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset North Cooper building- In the men's restroom insulate or otherwise configure water supply and drain pipes under sinks to protect against contact.	Pipes have been insulated.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Somerset North Cooper building- In the women's restroom insulate or otherwise configure water supply and drain pipes under sinks to protect against contact.	Pipes have been insulated.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset North Parking Lot C – 1) Correct the two spaces in front of Stoner Hall so the slope is not more than 1:48 (2%) in any direction in any spot in the space. 2) Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	1.) ADA spaces have been removed. 2.) ADA signage has been removed.	Paul Hall Paul Hall	10/31/2019 10/31/2019	Follow up report issued 12/31/2019 to State Agency. Follow up report issued 12/31/2019 to State Agency.	1.) Complete 2.) Complete
Somerset North Parking Lot D- Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	Signage has been adjusted to meet ADA standard.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Somerset North Parking Lot B- Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	Signage has been adjusted to meet ADA standard.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset North Parking Lot A-Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	Signage has been adjusted to meet ADA standard.	Paul Hall	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset South Building One- Have wash fountains that are operational with one hand or designate an existing accessible space for classes being held in the workshops.	ADA compliant portable wash stations will be purchased and available to students who need to use them based on disability.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	
Somerset South Building Two- In the men's restroom insulate or otherwise configure water supply and drain pipes under sinks to protect against contact.	Pipes have been insulated.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Somerset South Building Two- Adjust the AED so it does not stick out more than 4 inches into the path of travel, or the leading edge is lower the 27 inches.	AED has been relocated out of path of travel.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset South Building Four- Have an accessible route to the accessible entrance.	ADA space has been added at rear of Building Four.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset South Building Four- Have clear floor space 30 inches by 48 inches min in front of the accessible sink with covered pipes.	Trash can has been moved allowing accessibility.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset South Building Five- In the women's restroom insulate or otherwise configure water supply and drain pipes under sinks to protect against contact.	Pipes have been insulated.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset South Parking- Adjust the height of the International Symbol of Accessibility signs to be at least 60 inches high from the bottom of the sign to the ground.	Signage has been adjusted to meet ADA standard.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete

On-Site Visit Conducted: July 8, 15-16, 23-25, 2019
 LOF emailed: August 29, 2019
 VCP due by September 30, 2019

Somerset Community College
 Voluntary Compliance Plan

Issue Area and Required Corrective Action	Specific Corrective Action to be Completed	Responsible Party	Target Completion Date	How Completion of Remedy will be Reported and Verified to KDE.	Comments
Somerset South Parking- In front of building five correct the van accessible space and the access aisle are level and the slope is not more than 1:48 (2%) in any direction in any spot in the space.	Two additional spaces added. One is van accessible.	Johnnie Dick	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Somerset South Parking- The accessible space in front of building four correct the spaces so the slope is not more than 1:48 (2%) in any direction in any spot in the spaces.	Relocated spaces away from the drain.		10/31/2019	Follow up report issued 12/31/2019 to State Agency.	Complete
Alter the wording on the John. T Smith scholarship for the racial requirements.	We are reviewing the scholarship description with KCTCS.	Tracy Casada	10/31/2019	Follow up report issued 12/31/2019 to State Agency.	

On-Site Visit Conducted: July 8, 15-16, 23-25, 2019
LOF emailed: August 29, 2019
VCP due by September 30, 2019
Printed Name: Tracy Casada

Somerset Community College
Voluntary Compliance Plan

Signature: Tracy Casada
Date: 9/25/19

Title: VP of Student Affairs

Please submit to:

Amy Ortwein
300 Sower Blvd 4th Floor
Frankfort, KY 40601
Amy.Ortwein@Education.KY.Gov

Voluntary Compliance Plan due back to Kentucky Dept. of Education by September 30, 2019