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To: District Superintendents  
Superintendents of Schools  
Public School Administrators  
Nonpublic School Administrators  
Charter School Administrators

From: Deborah Reiter, CTE Bureau Chief

Date: February 11, 2021

Re: Updated NYS Civil Rights Compliance Methods of Administration Plan

This memo is to inform you of changes to secondary-level civil rights compliance reviews of Career and Technical Education (CTE). Pursuant to the [Office of Civil Rights 1979 guidelines](#), civil rights compliance reviews are conducted annually by the Office of CTE. Historically, these reviews were identified through a targeting plan based only on data from the NYSED data warehouse. The Methods of Administration Coordinator had the sole responsibility of conducting the selection process and identifying the LEA and BOCES requiring a review. In the past, all subrecipients selected would automatically receive a comprehensive civil rights review that consisted of a desk audit of materials, interviews with staff and students, an on-site facility review, and technical assistance.

The 2020 Methods of Administration Plan (MOA Plan) approved by the United States Department of Education that integrates various aspects of the work carried out by the Office of CTE. In this decentralized model, all CTE associates participate in efforts to detect activities that signal possible civil rights compliance issues. The MOA Plan builds on existing Perkins grant and CTE program review procedures and widens our view of the factors that impact access to CTE.

Perkins application reviews done by CTE associates will integrate a civil rights component. Staff will identify potential issues by monitoring several factors, such as enrollment and technical assessment pass rates of protected groups, to identify which subrecipients may require technical assistance or a civil rights compliance review.

CTE program reapproval reviews have always included implicit equity monitoring. New York State will continue to monitor equity in CTE program approval and implementation.

CTE program amendment forms that are submitted to request changes in the program during the five-year approval period will now be assessed for potential disparate treatment of protected groups (e.g., request to add a separate employability profile or a

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