

2020 Iowa MOA Plan

July 31, 2020

a. Introductory Information

The lead agency in the establishment of Iowa's MOA Plan is the Iowa Department of Education (Department). The Department has ultimate responsibility for all aspects of the MOA Plan, which include civil rights data collection, equity evaluations, ADA accessibility, Community Colleges, and Career and Technical Education (CTE). As a result of this all-encompassing responsibility, it was determined that the Department of Education would be the only state agency participating in the creation of Iowa's MOA Plan.

First of all, the State MOA coordinator was charged with creating the original draft of the MOA Plan based on the coordinator's knowledge and experience. Secondly, lead staff from the five main focus areas of the plan were identified as part of the MOA Plan team. These staff members previously engaged in the civil rights work under the old format. As part of the work in creating the MOA Plan, these staff provided information about:

- the data currently being collected by their area;
- what data best represents programs in need of support;
- how to conduct more effective civil rights reviews of CTE programs; and
- how best to support those programs identified as not meeting requirements or expectations.

Secondly, lead staff analyzed the information presented by the lead staff in these focus areas and arrived at a process for the MOA Plan. These decisions included:

- what data would be gathered and analyzed;
- whose responsibility it was to collect the data;
- who would be responsible for analyzing the data;
- established criteria for identifying CTE programs that need support;
- established process for providing support to programs;
- how the supports would be provided; and
- what reporting mechanism would be used to identify and track areas of noncompliance.

Lastly, the MOA Plan was reviewed by all bureau chiefs with supervisory authority over the five focus areas of the MOA Plan. After approval of the plan by the bureau chiefs, the division administrators from Community Colleges and Workforce Preparation, School Finance and Support Services, and Learning and Results were provided with the opportunity to review and approve the MOA Plan. The last step in the review process was to present the MOA Plan for approval to the Department's Director.

b. Plan for Performing Oversight Responsibilities

Iowa has established the following procedures as part of the state's compliance program to help prevent, identify, and remedy discrimination based on race, color, national origin,

sex, and disability. The state's compliance program, under the MOA Plan, is divided into two separate parts, a local education agency component, and a community college component.

Local Education Agency Component:

On an annual basis, civil rights data collected by the Department will be analyzed to identify subrecipients considered to be the ten lowest performers statewide in the academic areas of Reading/Language Arts and Mathematics as measured by Perkins V core indicators of performance. These subrecipients will receive targeted technical assistance, at a minimum, focused specifically on their areas of concern. A subrecipient, who has already been identified as one of the ten lowest performers statewide in the academic areas of Reading/Language Arts and Mathematics, may also get flagged as having a disproportionately low percentage of students enrolled in CTE programming based on race, gender, and disability when compared to the general enrollment. These subrecipients will receive comprehensive technical assistance.

After these subrecipients are identified as needing targeted or comprehensive technical assistance, they will be notified in writing of their CTE program's determined areas of concern. Those subrecipients identified for targeted technical assistance will be required to provide additional written documentation about their CTE program in the areas of concern and to remedy any identified corrective actions imposed by the Department. Those subrecipients identified for comprehensive technical assistance will receive a site visit and be required to provide additional written documentation about their CTE program in the areas of concern. For any determined violation of civil rights, the subrecipient will be required to remedy any identified corrective actions imposed by the Department.

Community College Component:

The State of Iowa has 15 community colleges. These 15 colleges are categorized into five three-member cohorts. Every year, a single cohort is identified for a possible focused equity compliance review. Once a cohort has been selected for compliance review analysis, the cohort will not be eligible for selection for a five-year period. After scoring each community college in the cohort, the colleges are ranked based on the weighting factors discussed below with the highest-ranking community college being selected for a focused equity visit. In case of a tie in the ranking of the cohort member colleges, both colleges receive a focused equity visit. If a selected community college cannot be visited for a reason acceptable to the Department, the next-ranking subrecipient will receive a focused equity visit. The Department also reserves the right to add a community college not selected through the ranking system, if serious equity concerns are brought to the Department's attention.

1. Civil Rights Data Analysis Overview

Iowa's MOA universe includes both local education agencies and community colleges offering career and technical education programs at the secondary or post-secondary

level. Iowa defines career and technical education as an educational program specializing in the skilled trades, applied sciences, modern technologies, and career preparation. Any local education agency or community college providing this type of service will be considered a part of the MOA universe.

Local Education Agency Component:

Iowa will collect and analyze the following data sets for MOA purposes:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance;
- Proficiency percentages in Mathematics from Perkins V core indicators of performance;
- CTE enrollment data by race, sex, and disability gathered from Perkins V enrollment; and
- General enrollment data by race, sex, and disability gathered from Perkins V enrollment.

Iowa will perform a multi-tiered analysis to identify subrecipients with documented areas of concern that must be addressed as part of our compliance review. The following is a step-by-step process used to identify the ten lowest performers statewide in the academic areas of Reading/Language Arts and Mathematics:

- 1) Each local education agency's Reading/Language Arts percentage will be added to their Mathematics percentage from the Perkins V core indicators of performance;
- 2) The sum of these percentages will then be divided by 2 to arrive at an average percentage of proficiency in Reading/Language Arts and Mathematics;
- 3) The ten local education agencies identified as having the lowest percentage of proficiency statewide will be chosen to receive a desk audit and, at a minimum, targeted technical assistance of their CTE program based on all identified areas of concern;
- 4) After these ten local education agencies are identified, the second level of data analysis is performed to select those local education agencies to receive comprehensive technical assistance in their areas of concern;
- 5) Each local education agency's individual CTE program's enrollment by race is divided by the total general enrollment by race to arrive at a percentage;
- 6) If the calculated percentage is 25% or lower, the individual CTE program is identified as a program for review;
- 7) If a local education agency has 50% or more of their individual CTE programs considered as a program for review based on race, the local education agency will be chosen to receive comprehensive technical assistance in this area of concern;
- 8) If a local education agency does not have 50% or more of their individual CTE programs considered as a program for review based on race, the local education agency will be chosen to receive targeted technical assistance in this area of concern;

- 9) Each local education agency's individual CTE program's enrollment by sex is divided by the total general enrollment by sex to arrive at a percentage;
- 10) If the calculated percentage is 25% or lower, the individual CTE program is identified as a program for review;
- 11) If a local education agency has 50% or more of their individual CTE programs considered as a program for review based on sex, the local education agency will be chosen to receive comprehensive technical assistance in this area of concern;
- 12) If a local education agency does not have 50% or more of their individual CTE programs considered as a program for review based on sex, the local education agency will be chosen to receive targeted technical assistance in this area of concern;
- 13) Each local education agency's individual CTE program's enrollment by disability is divided by the total general enrollment by disability to arrive at a percentage;
- 14) If the calculated percentage is 25% or lower, the individual CTE program is identified as a program for review;
- 15) If a local education agency has 50% or more of their individual CTE programs considered as a program for review based on disability, the local education agency will be chosen to receive comprehensive technical assistance in this area of concern;
- 16) If a local education agency does not have 50% or more of their individual CTE programs considered as a program for review based on disability, the local education agency will be chosen to receive targeted technical assistance in this area of concern;
- 17) Targeted technical assistance is written and focused on the specific areas of concern identified for the subrecipient. Furthermore, the subrecipient will be required to document additional trainings offered to relevant staff in the areas of concern. This training can be provided by the MOA coordinator or lead staff, OCR, or other state or national equity experts. In addition, all buildings housing CTE programs that were constructed before January 1, 1990, must receive an onsite, ADA accessibility visit to determine any areas of noncompliance. All information gathered through the written exchanges and site visits and trainings performed as part of the targeted technical assistance shall be part of the OCR reporting requirement of the Department; and
- 18) Comprehensive technical assistance will be performed through a site visit with written reporting focused on the specific areas of concern identified for this subrecipient. Furthermore, the subrecipient will be required to document additional trainings offered to relevant staff in the areas of concern. This training can be provided by the MOA coordinator or lead staff, OCR, or other state or national equity experts. In addition, all buildings housing CTE programs must receive an onsite, ADA accessibility visit to determine any areas of noncompliance. All information gathered through the written exchanges and site visits and trainings performed as part of the targeted technical assistance shall be part of the OCR reporting requirement of the Department.

Community College Component:

Iowa will collect and analyze the following data sets for MOA purposes:

- 1) Community College enrollment patterns in career and technical education programs:
 - a. Sex Enrollment
 - i. The percent of CTE programs that have eighty percent or more students of one sex enrolled (i.e., more than 80% male or more than 80% female (Indicator A – weighted 0.5)
 - ii. The variance of the percent of students enrolled in CTE programs by sex compared to the percent of students enrolled in the school by sex (Indicator B – weighted 0.5)
 - b. Racial/ethnic background
 - i. The variance of the percent of minority students enrolled in CTE programs compared to the percent of minority students enrolled in the school (Indicator C – weighted 1.0)
 - c. Disability
 - i. The variance of the percent of students with disabilities enrolled in CTE programs compared to the percent of students with disabilities enrolled in the school (Indicator D – weighted 1.0)
- 2) Demographics of the Community Colleges (Indicator E – weighted 1.0)
 - a. Change in the percentage of minority students over the past five years. Some community colleges are undergoing relatively rapid changes in the demographics of their general population or student population. This change is most commonly reflected in changes in the racial/ethnic makeup of the population. The changes in demographics may be caused by:
 - i. Natural migration, mobility, employment patterns
 - ii. Change in student recruiting practices
- 3) Equity-Related Complaints (Indicator F – weighted 1.0) Complaints received by the Division of Community Colleges & Workforce Preparation's complaint process from:
 - a. Other divisions or personnel within the Iowa Department of Education
 - b. Applicants for employment or admission
 - c. Iowa College Student Aid Commission
 - d. Students, parents, and/or staff
 - e. Community members
 - f. Media reports
- 4) Time Elapsed Since the Last On-Site Equity Review (Indicator G – weighted 4.0): Indicator G takes into consideration the time that has elapsed since the community colleges have received a Focused Equity Review. This criteria has been weighted more than the others because of the cyclical nature of the division's accreditation/equity review cycle. Using this weighting method, in any given year,

if a college that is not targeted for review has not received an equity review within the prior 15-year period, the Division will review that college in addition to the targeted college.

Ranking of Community Colleges for Selection for Focused Equity Reviews

Sex-Typed Enrollment - Individual Enrollment	Sex-Typed Enrollments – Total Enrollment	Racial/Ethnic Typed Enrollments	Disability Typed Enrollments	Demographic Change	Referrals & Complaints	Time Elapsed
Indicator A	Indicator B	Indicator C	Indicator D	Indicator E	Indicator F	Indicator G
Ranked Score	Ranked Score	Ranked Score	Ranked Score	Ranked Score	Ranked Score	Ranked Score
Weighted .5	Weighted .5	Weighted 1.0	Weighted 1.0	Weighted 1.0	Weighted 1.0	Weighted 4.0

After applying the data for community colleges to the cohort, each subrecipient is ranked from highest to lowest for each indicator A-G.

- A high rank indicates a high occurrence of the indicator, and conversely, a low rank indicates a low occurrence of the indicator (i.e., 3, 2, 1 for the highest rank, 2nd highest, and lowest).
- These ranked values are then multiplied by each criteria’s weight, producing a “score” for each criteria.
- The sum of the scores for each community college across all indicators equals the “final score”.
- The one (1) community college with the highest final score will be chosen for a focused equity review.
- In the case of a tie, the tied colleges shall both receive a focused equity visit during that year.
- If a selected subrecipient cannot be visited for a reason determined to be acceptable by our Department, the next ranking subrecipient will be visited instead.

2. Processes and Procedures to Conduct Compliance Reviews of Selected Subrecipients

Local Education Agency Component:

Iowa is utilizing a multi-tiered approach for compliance reviews of local education agencies, which means at least ten local education agencies annually will be identified to receive a desk audit. These desk audits will review the CTE programs based on academic performance in Reading/Language Arts and Mathematics and a disproportionately low percentage of students enrolled in CTE programming based on race, sex, and disability when compared to the general enrollment by race, sex, and disability. Those subrecipients with areas of concern based on the disproportionately low

percentage of students enrolled in CTE programming based on race, sex, and disability when compared to the general enrollment by race, sex, and disability will receive comprehensive technical assistance, and those subrecipients with areas of concern not considered to have disproportionate representation in CTE programs based on race, sex, and disability will receive targeted technical assistance.

Targeted technical assistance involves some or all of the following investigative techniques based on the area of concern and the information needed to make a determination of compliance:

- 1) Review of local education agency website;
- 2) Staff interviews by phone;
- 3) Survey of staff members;
- 4) Review of various forms of local education agency submissions pertinent to the area of concern;
- 5) Additional data review;
- 6) Review of training materials pertinent to the area of concern;
- 7) Review of student/teacher handbooks;
- 8) Review of written or verbal complaints submitted to the Department; and
- 9) Review of local education agency provided documentation.

Comprehensive technical assistance involves some or all of the following investigative techniques based on the area of concern and the information needed to make a determination of compliance:

- On-site visit;
- Review of local education agency website;
- Staff interviews by in person or phone;
- Survey of staff members;
- Review of various forms of local education agency submissions pertinent to the area of concern;
- Additional data review;
- Review of training materials pertinent to the area of concern;
- Review of student/teacher handbooks;
- Review of written or verbal complaints submitted to the Department; and
- Review of local education agency provided documentation.

For purposes of ADA accessibility review, all subrecipients receiving targeted technical assistance will receive an on-site visit, which involves ADA accessibility compliance review of all buildings offering CTE programs that were constructed before January 1, 1990. All subrecipients receiving comprehensive technical assistance will receive an on-site visit, which involves an ADA accessibility compliance review of all buildings offering CTE. Any and all issues of noncompliance will be identified through these on-site visits.

After the compliance reviews have been performed, all areas of concern and issues of noncompliance will be entered into the corrective action section of the Consolidated

Accountability and Support Application (CASA) system. When citations are entered into the system, it generates an email to the administrator of the local education agency with a request to correct the noncompliance. Furthermore, the system indicates the timeframe in which the citation was to be corrected. After the local education agency corrects the citation, the Department staff review the evidence submitted. If the area of noncompliance is corrected to the satisfaction of Department staff, the staff member changes the status of the citation to "Completed." This action then generates an email, which is sent to the administrator of the local education agency informing them their noncompliance has been corrected.

Various parts of the MOA compliance reviews will be performed by twelve distinct staff members. Twelve distinct staff members perform compliance review activities in the following focus areas, equity evaluations {8}, ADA accessibility {3}, and Career and Technical Education {1}.

The following is a step-by-step process for conducting compliance reviews:

- 1) Notify subrecipients they have been identified as requiring a desk audit of their CTE programs;
- 2) Notify the local education agency of the additional sources of information needed and the processes to gather such information for review based on whether they were identified as targeted and comprehensive;
- 3) Notify subrecipients, through the Consolidated Accountability and Support Application system, of any findings of noncompliance based the targeted or comprehensive technical assistance reviews; and
- 4) Inform the subrecipient of the timeline for making corrections of the areas of noncompliance through the Consolidated Accountability and Support Application system.

Community College Component:

Iowa is utilizing a cohort approach for compliance reviews of community colleges, which means at least three community colleges annually will be identified to receive an analysis for compliance review. The highest-ranking community college, based on the analysis, will be chosen for a focused equity review.

A focused equity review involves some or all of the following investigative techniques based on the information needed to make a determination of compliance:

- On-site visit;
- Review of local education agency website;
- Staff interviews by in person or phone;
- Survey of staff members;
- Review of various forms of community college submissions pertinent to the area of concern;
- Additional data review;

- Review of training materials pertinent to the area of concern;
- Review of student/teacher handbooks;
- Review of written or verbal complaints submitted to the Department; and
- Review of community college provided documentation.

For purposes of the ADA accessibility review, the selected subrecipient receives an on-site visit, which involves ADA accessibility compliance review of all buildings offering CTE. Any and all issues of noncompliance will be identified through these on-site visits.

After the compliance reviews have been performed, all areas of concern and issues of noncompliance will be documented in a written report. The written report will be sent to the community college for review. The community college will then submit a written report to the Department stating the processes for correction of noncompliance and a timeline for completion. Various parts of the community college MOA compliance reviews will be performed by four distinct staff members. One of these members will verify the corrections were made to the satisfaction of the Department and provide them with written documentation that all areas of noncompliance have been corrected.

The following is a step-by-step process for conducting compliance reviews:

- A. Notify the selected subrecipient they have been identified as requiring a focused equity visit of their CTE programs;
- B. Notify the community college of the additional sources of information needed and the processes to gather such information for review;
- C. Notify subrecipient of any findings of noncompliance through a written report based the focused equity visit review; and
- D. Inform the subrecipient of the timeline for making corrections of the areas of noncompliance and the process to indicate completion of corrections of noncompliance.

c. Technical Assistance

Outreach:

The State of Iowa's technical assistance process is multi-faceted. First of all, Iowa's MOA coordinator has the primary responsibility to conduct state-wide technical assistance outreach to subrecipients. On an annual basis, the MOA coordinator will post in the "School Leader Update" any and all equity trainings occurring during the school year. These trainings may be state sponsored, OCR sponsored, and/or sponsored by state or national experts in the field of equity. Furthermore, the MOA coordinator will post in the "School Leader Update" any, and all, equity trainings not previously identified that may benefit subrecipients on an as needed basis.

Another form of technical assistance outreach will also occur through lead staff in the five main focus areas performing the work identified within the MOA Plan. The technical assistance outreach offered by the lead staff will occur on an as needed basis, which

focuses specifically on the subrecipients within their area. These trainings may be state-sponsored, OCR sponsored, and/or sponsored by state or national experts in the field of equity. Furthermore, subrecipients may also reach out to the MOA coordinator or any member of the lead staff to seek technical assistance on any matter dealing with equity.

Lastly, any program identified as needing further support and assistance through the periodic compliance reviews shall be contacted annually to receive further, required technical assistance to address all areas of concern identified. The technical assistance provided shall be determined by the MOA coordinator and lead staff and focused on the areas of noncompliance.

Available Technical Assistance:

Local Education Agency Component:

Under Iowa's MOA Plan, there are three levels of technical assistance, which include voluntary technical assistance, targeted technical assistance, and comprehensive technical assistance. Each level of technical assistance occurs at various stages of the process. The first type of technical assistance is voluntary and can occur at any time throughout the process. The second and third levels of technical assistance are required and cannot be refused by the subrecipient.

Typically, voluntary technical assistance occurs as the result of the subrecipient contacting the MOA coordinator or a member of the lead staff. This type of technical assistance is not required, but offered to help subrecipients avoid issues with their CTE program based on lack of knowledge. This form of technical assistance is usually verbal or written and focused on the specific question being asked by the subrecipient.

Targeted technical assistance occurs as a result of the subrecipient being identified as one of the ten lowest performers statewide in the academic areas of Reading/Language Arts and Mathematics. The ten subrecipients with the lowest average percentage for these two categories will be chosen to receive targeted technical assistance. This form of technical assistance is written and focused on the specific areas of concern identified for this subrecipient. Furthermore, the subrecipient will be required to document additional trainings offered to relevant staff in the areas of concern. This training can be provided by the MOA coordinator or lead staff, OCR, or other state or national equity experts. In addition, all buildings housing CTE programs that were constructed before January 1, 1990 must receive an onsite, ADA accessibility visit to determine any areas of noncompliance. All information gathered through the written exchanges and site visits and trainings performed as part of the targeted technical assistance shall be part of the OCR reporting requirement of the Department.

Comprehensive technical assistance occurs when a subrecipient, has already been identified as one of the ten lowest performers statewide in the academic

areas of Reading/Language Arts and Mathematics, and is also flagged for having a disproportionately low percentage of students enrolled in CTE programming based on race, gender, and disability in comparison to general enrollment. This form of technical assistance will be performed through a site visit with written reporting focused on the specific areas of concern identified for this subrecipient. Furthermore, the subrecipient will be required to document additional trainings offered to relevant staff in the areas of concern. This training can be provided by the MOA coordinator or lead staff, OCR, or other state or national equity experts. In addition, all buildings housing CTE programs must receive an onsite, ADA accessibility visit to determine any areas of noncompliance. All information gathered through the written exchanges and site visits and trainings performed as part of the targeted technical assistance shall be part of the OCR reporting requirement of the Department.

Community College Component:

Under Iowa's MOA Plan, community colleges receive two levels of technical assistance, which include voluntary technical assistance and focused equity visit technical assistance. Each level of technical assistance occurs at various stages of the process. The first type of technical assistance is voluntary and can occur at any time throughout the process. The second level of technical assistance is required and cannot be refused by the subrecipient.

Typically, voluntary technical assistance occurs as the result of the subrecipient contacting the MOA coordinator or a member of the lead staff. This type of technical assistance is not required, but offered to help subrecipients avoid issues with their CTE program based on lack of knowledge. This form of technical assistance is usually verbal or written and focused on the specific question being asked by the subrecipient.

Focused equity visit technical assistance occurs as a result of a subrecipient being selected to receive a focused equity visit. This form of technical assistance will be performed through a site visit with written reporting focused on the specific areas of noncompliance identified for this subrecipient. Furthermore, the subrecipient will be required to document additional information in the areas of concern. These findings may also require additional training of community college staff. This training can be provided by the MOA coordinator or lead staff, OCR, or other state or national equity experts. In addition, all buildings housing CTE programs must receive an onsite, ADA accessibility visit to determine any areas of noncompliance. All information gathered through the written exchanges and site visits and trainings performed as part of the targeted technical assistance shall be part of the OCR reporting requirement of the Department.

Technical Assistance Staff and Responsibilities:

There are fifteen distinct staff members assigned to provide technical assistance activities to subrecipients in the following focus areas, civil rights data collection {1}, equity evaluations {8}, ADA accessibility {2}, Community Colleges {2}, and Career and Technical Education {2}. Of the fifteen distinct staff members performing technical assistance activities, thirteen of these staff members will also be engaged in the review of subrecipient activities.

Authority & Signature

As Director of the Iowa Department of Education, I possess the signatory authority to bind the State of Iowa to this MOA Plan.



Ann Lebo, Director
Iowa Department of Education

August 3, 2020

Date