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System of Georgia

Methods of Administration

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Purpose of the MOA

- **What is the Methods of Administration (MOA)?**

- The MOA is a federally required compliance framework that ensures recipients of federal financial assistance:
  - Do not discriminate in career and technical education (CTE) programs
  - Comply with federal civil rights laws
  - Provide equitable access to programs and services

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Legal & Regulatory Framework

TCSG's MOA is grounded in:

- Title VI of the Civil Rights Act of 1964 (Race, color, national origin)

- Title IX of the Education Amendments of 1972 (Sex discrimination)

- Section 504 of the Rehabilitation Act of 1973 (Disability)

- Title II of the Americans with Disabilities Act (ADA)

- Vocational Education Guidelines (34 CFR Part 100 Appendix B)

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Oversight Structure

Federal Level

- U.S. Department of Education Office for Civil Rights (OCR)

State Level

- TCSG System Office
- Office of Workforce Development
- Office of Compliance & Equity

Local Level

- Individual Technical Colleges
- College Civil Rights Coordinators

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Core Components of the MOA Process

1. Policy Review
2. Data Collection & Analysis
3. Desk Audits
4. On-Site Reviews
5. Findings & Corrective Actions
6. Monitoring & Follow-Up

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Policy & Procedure Review

TCSG ensures that:

- Nondiscrimination statements are published

- Grievance procedures are in place

- Designated Title IX and Section 504 coordinators are appointed

- Accessibility policies are implemented

Outcome: Institutional policies align with federal requirements.

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Data Collection & Analysis

TCSG collects and evaluates:

- Enrollment data by race, sex, disability, and national origin

- Program participation trends

- Completion and placement rates

- Recruitment materials and outreach efforts

Purpose: Identify disparities or underrepresentation

Desk Audit Process

The System Office:

- Reviews submitted documentation from colleges

- Evaluates publications, websites, and promotional materials

- Assesses grievance logs and complaint procedures

- Examines accessibility compliance documentation

Result: Identification of potential compliance concerns.

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On-Site Compliance Reviews

On-site reviews include:

- Interviews with administrators, faculty, and students
- Facility accessibility inspections
- Classroom and lab observations
- Review of student support services

Focus Areas:

- Equal access
- Physical accessibility
- Program equity
- Complaint resolution procedures

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Areas of Compliance Evaluation

During MOA reviews, TCSG evaluates:

- Admission practices
- Counseling services
- Financial aid procedures
- Work-based learning access
- Facilities and equipment
- Comparable facilities for male and female students
- Services for students with disabilities
- English Learner support

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Findings & Corrective Action Plans

If noncompliance is identified:

1. Written findings are issued
2. College must submit a Corrective Action Plan (CAP)
3. Timeline for resolution is established
4. Evidence of correction must be provided

Failure to correct may result in:

- Escalation to OCR
- Risk to federal funding

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Monitoring & Continuous Improvement

TCSG ensures ongoing compliance through:

- Periodic monitoring

- Required progress reports

- Technical assistance to colleges

- Professional development & training

Goal: Prevent future violations and institutionalize equity practices.

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Annual & Cyclical Review Process

- Colleges are reviewed on a rotating cycle
- Risk-based prioritization may occur
- Documentation retention is required
- Follow-up reviews verify corrective actions

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Roles & Responsibilities

System Office

- Oversees MOA implementation
- Conducts compliance reviews
- Reports to U.S. Department of Education

College Leadership

- Ensures institutional compliance
- Implements corrective actions
- Promotes equitable practices

Civil Rights Coordinators

- Manage complaints
- Coordinate investigations
- Monitor policy implementation

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Risk Areas for Institutions

Common compliance risk areas:

- Inadequate nondiscrimination notices

- Website accessibility gaps

- Gender inequities in program recruitment

- Lack of ADA accommodations

- Improper grievance procedures

Benefits of a Strong MOA Process

- Protects federal funding
- Reduces litigation risk
- Promotes student equity
- Strengthens institutional integrity
- Enhances public trust

Summary

The Methods of Administration process ensures that:

- Technical colleges operate equitably
- Students have nondiscriminatory access to CTE programs
- Institutions comply with federal civil rights laws
- Continuous monitoring strengthens compliance culture

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Questions & Discussion

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