

From: [David Osborne](#)
To: [Chase, Morgan](#); cbmeyerbrown@cps.edu
Cc: [MOA](#); [Marci Johnson](#); [Sophia Nuding](#)
Subject: SY23 Letters of Finding
Date: Monday, December 30, 2024 4:00:38 PM
Attachments: [SY23 MOA FR- Hubbard.pdf](#)
[SY23 MOA FR- Infinity Math Science Tech.pdf](#)
[SY23 MOA FR- Sullivan.pdf](#)
[SY23 MOA LOF - Infinity Math Science Tech HS Letterhead.pdf](#)
[SY23 MOA LOF- Hubbard High School Letterhead.pdf](#)
[SY23 MOA LOF- Sullivan High School Letterhead.pdf](#)

Good afternoon, Chase and Chandler.

I would like to start by apologizing for the delay in sending these letters but it just recently came to my attention that these were not previously shared.

Thank you for taking the time to assist the Illinois State Board of Education (ISBE) during our on-site civil rights compliance review of Hubbard High School, Sullivan High School, and Infinity Math Science & Tech HS conducted in October through December of 2023.

As recipients of federal financial assistance, Hubbard High School, Sullivan High School and Infinity Math, Science, & Tech High School are 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.

These three schools were selected for review based on ISBE'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.

These letters of findings (LOFs) summarize ISBE's findings in the following eight major areas of review:

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

The LOFs describe any findings of noncompliance for which corrective action is required. All required corrective action must be included in the Voluntary Compliance Plan (VCPs). The district can develop its Voluntary Compliance Plans in the Methods of Administration Civil Rights system in IWAS. At a minimum, your VCP should address every item of noncompliance, describe the corrective action that your district 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 ISBE. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. Please submit your completed VCPs to ISBE by February 28, 2025. We will review the VCPs, and either approve it as submitted, or work with you to ensure that the appropriate corrective action is taken to bring your school into compliance. We encourage you to await approval of your VCPs from ISBE prior to completing corrective action or any repairs.

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the ISBE's review and scheduling interviews was much appreciated. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

If you have any questions regarding this LOF or if you need any assistance preparing your VCP, please email Sophie Nuding at snuding@isbe.net or MOA@isbe.net.

David Osborne

Principal Consultant/Methods of Administration Coordinator for Secondary Education

CTE & Innovation

Illinois State Board of Education

217-557-1254

December 30, 2024

Mr. Pedro Martinez
Chicago Public Schools District 299
42 W Madison St 2nd Floor
Chicago, IL 60602

Dear Mr. Martinez:

Thank you for taking the time to assist the Illinois State Board of Education (ISBE) during our on-site civil rights compliance review of Hubbard High School conducted on December 22, 2023.

As a recipient of federal financial assistance, Hubbard High School 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.

Hubbard High School was selected for review based on ISBE'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.

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


- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling;
- III. Accessibility: See Attachment III: Facilities Review
- 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. All required corrective action must be included in Hubbard High School's Voluntary Compliance Plan (VCP). The district can develop its Voluntary Compliance Plan in the Methods of Administration Civil Rights system in IWAS. At a minimum, your VCP should address every item of noncompliance, describe the corrective action that your district 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 ISBE. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. Please submit your completed VCP to ISBE by February 28, 2025. We will review the VCP, and either approve it as submitted, or work with you to ensure that the appropriate corrective action is taken to bring your school into compliance. *We encourage you to await approval of your VCP from ISBE prior to completing corrective action or any repairs.*

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the ISBE's review and scheduling interviews was much appreciated. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

If you have any questions regarding this LOF or if you need any assistance preparing your VCP, please email MOA@isbe.net.

Sincerely,



Marci Johnson
Director of CTE and Innovation

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.

Summary of Findings from On-site Review of Hubbard High School conducted on
December 22, 2023

I. Administrative Requirements

A. Annual Notice of nondiscrimination

Applicable Requirements:

Guidelines Section IV.O.

Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or disability. Announcement of this policy of nondiscrimination may be made, for example, in local newspapers, recipient publications, and/or other media. The notice must include a brief summary of program offerings and admission criteria, as well as the name, office address, and phone number of the person(s) designated to coordinate compliance under Title IX, Section 504, and Title II. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Summary of Findings and Analysis:

ISBE reviewed evidence submitted by the district, reviewed the district and school websites, and interviewed school and district representatives. The district provided a link to their Non-Discrimination Statement; an upload of the district's Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy; an upload of instructions for posting non-discrimination materials; and the district's Non-Discrimination Statement flyer. The Non-Discrimination statement is found under the district's "About" section on the district home page. The statement does provide protection for sexual orientation, gender or sex (includes gender identity, gender expression, pregnancy, childbirth, breastfeeding, and pregnancy related medical conditions), race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, marital status, registered domestic partner status, genetic information, political belief or affiliation (not union-related), military status, unfavorable discharge from military service, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics.

All of the required protected bases of nondiscrimination are covered by this statement. The statement also includes contact information for the Office of Student Protections, Title IX Coordinator, Section 504 Coordinator, Office of Inspector General, and U.S. Department of Education's Office of Civil Rights. However, this statement does not contain a brief summary of CTE program offerings and admission criteria. Additionally, the district does serve a community of national origin minority persons with limited English language skills but does not provide a statement that the district will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

Required Corrective Action(s):

Revise, modify, or create a new notice of non-discrimination to address the requirements of the Annual Notice of Nondiscrimination requirement found in "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) (34 C.F.R. Part 100, Appendix B, IV.O).

This statement must include a brief summary of CTE programs offerings and admission criteria and a statement assuring that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

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.

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees, and unions, that it does not discriminate on the basis of race, color, national origin, sex, or disability. The notice must identify the employees designated to coordinate compliance under Title IX, Section 504, and Title II. If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of this nondiscrimination policy.

Summary of Findings and Analysis:

ISBE reviewed the evidence submitted by the district, the district and school websites, and interviewed district and school representatives. The district provided a link to their Non-Discrimination Statement; an upload of the district's Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy; an upload of instructions for posting non-discrimination materials; and the district's Non-Discrimination Statement flyer. The Non-Discrimination statement is found under the district's "About" section on the district home page. The statement does provide protection for sexual orientation, gender or sex (includes

gender identity, gender expression, pregnancy, childbirth, breastfeeding, and pregnancy related medical conditions), race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, marital status, registered domestic partner status, genetic information, political belief or affiliation (not union- related), military status, unfavorable discharge from military service, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics. All of the required protected bases of nondiscrimination are covered by this statement. The statement also includes contact information for the Office of Student Protections, Title IX Coordinator, Section 504 Coordinator, Office of Inspector General, and U.S. Department of Education's Office of Civil Rights. The statement provides more than sufficient information to meet the requirements of a continuous notice of nondiscrimination.

However, ISBE reviewed the major publications and recruitment materials on both the district website and the school website and found no evidence of a continuous notice of nondiscrimination on these documents. On the district's CTE webpage, there is a link to the Non-Discrimination statement, but the page also contains several links to recruitment materials such as "Guide to CTE", the "CTE Matrix", and the "CTE Certification List". On the school website, the school has several major publications such as the student handbook and the course guide. None of these documents contained a continuous notice of nondiscrimination.

Required Corrective Action(s):

Provide a continuous notice of nondiscrimination on major publications and recruitment materials published by the district and schools that meets the requirements outlined in 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106. This statement should include a notice that the district does not discriminate on the basis of race, color, national origin, sex, or disability. Additionally, the notice should contain the name/title, email, phone, and address of the Title IX and Section 504 coordinator.

C. Designation of Compliance Coordinators

Applicable Requirements:

34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a).

A recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under those laws and regulations, including investigations of complaints alleging noncompliance.

Summary of Findings and Analysis:

ISBE reviewed evidence provided by the district, reviewed the district and school websites, and interviewed district and school representatives. The district has properly designated coordinators for compliance activities for both Title IX and Section 504. The district also has an Office of Student Protections that coordinate compliance efforts for these activities and there are liaisons at each of the schools to provide guidance on these compliance activities and information. During the on-site review, ISBE observed postings throughout the building providing contact information for the Office of Student Protections and information about the protections for students under these laws and regulations. Interviews revealed an awareness of students, teachers, staff, and administrators of who to contact in order to file a complaint or grievance in compliance with the laws and regulations. No evidence of noncompliance was found.

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).

A recipient shall adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

Summary of Findings and Analysis:

ISBE reviewed the evidence provided by the districts, reviewed the district and school websites, and interviewed district and school representatives. The grievance procedures are outlined in the OSP Procedure Manual, and the adult grievance process is outlined in the EOCO Procedure Manual which are available on the district website. Additionally, ISBE observed posters throughout the building providing a nondiscrimination statement that included information on where to find the grievance procedures and who to contact in order to file a complaint. Interviews revealed a general understanding of students, teachers, staff, and administrators of where to find the grievance procedures and who to contact. The grievance procedures included all required components. No evidence of noncompliance was found.

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)-(b), 106.34 and 106.35; 28 C.F.R. § 35.130.

A recipient may not develop, impose, maintain, approve, or implement admissions criteria that unlawfully discriminate on the basis of race, color, national origin, sex or disability. However, if a recipient can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory. Recipients may not deny students with disabilities access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory but, where possible, a recipient must adjust those requirements to the needs of students with disabilities.

Access to vocational programs or courses may not be denied to students with disabilities on the ground that employment opportunities in any occupation or profession may be more limited for individuals with disabilities than for individuals without disabilities. A recipient may not separate students by sex or deny a student access to a class or program based on their sex unless expressly authorized by Title IX or its implementing regulations.

Summary of Findings and Analysis:

ISBE reviewed evidence submitted by the district, reviewed the district website, and interviewed students, teachers, counselors, and administrators regarding the admission process into CTE programs. The district provided the admission criteria for selective academies and the criteria were not found to be unlawfully discriminatory. The district also provides a website that allows students to search schools in which to register with various search parameters including the CTE programs available. Interviews with students, teachers, staff, and administrators did not reveal any examples of unlawful barriers to access to classes. No evidence of noncompliance was found.

Required Corrective Action(s):

None

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

Applicable Requirements:

Guidelines Section IV.L.

Recipients may not restrict admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction.

Summary of Findings and Analysis:

ISBE reviewed the district's website and interviewed students, teachers, counselors, and administrators. The district offers English language supports to ensure that students have access to CTE courses and programs, and the review of data reveals that English Learner students are participating in these opportunities. Interviews did not reveal any barriers to admission to CTE programs based on English language skills. No evidence of noncompliance was found.

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 Recipients must ensure that their counseling materials and activities do not discriminate on the basis of race, color, national origin, sex, or disability. Recipients must ensure that counselors do not steer any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or students with disabilities, recipients must take steps to ensure that the disproportion does not result from unlawful discrimination in counseling activities.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, counselors, and administrators. Interviews did not reveal any evidence of counseling materials and activities being provided in a discriminatory manner or evidence of steering students into a particular program. No evidence of noncompliance was found.

Required Corrective Action(s):

None

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

Applicable Requirements:

Guidelines Section V.D; 34 C.F.R. §§ 100.3(a)- (b) and 104.37(b).

Recipients must ensure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

Summary of Findings and Analysis:

ISBE reviewed the school and district website and interviewed students, teachers, counselors, and administrators. The school has access to translation services and has worked to hire staff that are bilingual to support students with limited English skills. No evidence of noncompliance was found.

Required Corrective Action(s):

None

E. Recruitment and Promotional Activities

Applicable Requirements:

Guidelines Sections V.A, V.C, and V.E.

Recipients must take steps to ensure that their promotional and recruitment efforts do not discriminate or perpetuate stereotypes or limitations on the basis of race, color, national origin, sex, or disability. If a recipient's service area contains a

community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, counselors, and administrators. The recruitment material available on the district and school website did not perpetuate stereotypes and interviews did not reveal any evidence of discriminatory practices in the recruitment process. No evidence of noncompliance was found.

Required Corrective Action(s):

None

III. Physical Accessibility for Students with Disabilities

Applicable Requirements:

2010 ADA Standards

604.5 Grab Bars. Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall.

609. Grab Bars

1. General. Grab bars in toilet facilities and bathing facilities shall comply with 609.
2. Cross Section. Grab bars shall have a cross section complying with 609.2.1 or 609.2.2.
3. Circular Cross Section. Grab bars with circular cross sections shall have an outside diameter of 1 1/4 inches (32 mm) minimum and 2 inches (51 mm) maximum.
4. Non-Circular Cross Section. Grab bars with non-circular cross sections shall have a cross-section dimension of 2 inches (51 mm) maximum and a perimeter dimension of 4 inches (100 mm) minimum and 4.8 inches (120 mm) maximum.
5. Spacing. The space between the wall and the grab bar shall be 1 1/2 inches (38 mm). The space between the grab bar and projecting objects below and at the ends shall be 1 1/2 inches (38 mm) minimum. The space between the grab bar and projecting objects above shall be 12 inches (305 mm) minimum.

EXCEPTION: The space between the grab bars and shower controls, shower fittings, and other grab bars above shall be permitted to be 1 1/2 inches (38 mm) minimum.

6. Spacing of Grab Bars

7. **Position of Grab Bars.** Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.
8. **Surface Hazards.** Grab bars and any wall or other surfaces adjacent to grab bars shall be free of sharp or abrasive elements and shall have rounded edges.
9. **Fittings.** Grab bars shall not rotate within their fittings.
10. **Installation.** Grab bars shall be installed in any manner that provides a gripping surface at the specified locations and that does not obstruct the required clear floor space.
11. **Structural Strength.** Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the grab bar, fastener, mounting device, or supporting structure.

Summary of Findings and Analysis:

ISBE reviewed the facilities at Hubbard High School and found that one of the restroom stalls in a restroom designated as accessible did not provide a rear grab bar that aligns with 609 as required by 604.5.

Required Corrective Action(s):

Please see the attached facility report for required corrective actions.

IV. Comparable Facilities

Applicable Requirements:

Guidelines Section VI.D; 34 C.F.R. § 106.33.

Recipients must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex. Such facilities must be adapted or modified to the extent necessary to make the vocational education program readily accessible to individuals with disabilities.

Summary of Findings and Analysis:

ISBE reviewed the facilities and found that the male and female shower facilities in the locker rooms were not comparable. The male shower facility was a large open

space with no visual barriers or curtains between showerheads. The female shower facilities included curtains to allow for privacy while showering.

Required Corrective Action(s):

Provide comparable shower facilities for both male and female students.

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. Recipients may not deny students with disabilities access to vocational education programs or courses because of the need for related aids and services or auxiliary aids. If necessary, recipients must modify instructional equipment; modify or adapt the manner in which the courses are offered; provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary students with disabilities; and provide related aids or services that assure secondary students an appropriate education. Recipients must place secondary level students with disabilities in the regular educational environment of any vocational education program to the maximum extent appropriate to the needs of the student unless it can be demonstrated that the education of the student with a disability in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily.

Summary of Findings and Analysis:

ISBE reviewed the school and district website and interviewed students, teachers, counselors, and administrators. Interviews revealed several examples of accommodations provided to students to ensure that they could actively participate in CTE programs. No evidence of noncompliance was found.

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 Recipients generally may not award financial assistance to vocational education students on the basis of race, color, national origin, sex, or disability. Materials and information used to notify students of opportunities for financial

assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, staff, and administrators. The district does provide a fee waiver to students that is guided to by board policy 408.1. There is no evidence that this is provided in a discriminatory way and the qualifications for this waiver are communicated to families. No evidence of noncompliance was found.

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).

A recipient must ensure that it does not discriminate on the basis of race, color, national origin, sex, or disability in making available opportunities in cooperative education, work study and job placement programs. Recipients must also ensure that students participating in cooperative education, work study and job placement programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay. A recipient may not cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status.

Summary of Findings and Analysis:

ISBE reviewed the district and school websites and interviewed students, teachers, counselors, and administrators. The district offers a variety of work-based learning opportunities including the Chicago Police and Fire Training Academy, Chicago Builds, Genesys Works, and other internship and placement opportunities. The district coordinates with each of these programs to ensure that students rights are protected, and the opportunities appear to be available to student in a nondiscriminatory manner. No evidence of noncompliance was found.

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
Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability. Recipients generally may not make pre-employment inquiries concerning disability or marital status.

Summary of Findings and Analysis:

ISBE reviewed the district and school websites and interviewed students, teachers, counselors, and administrators. The district provides a website to oversee employment opportunities and a job board. Each of the jobs listed contains a notice of non-discrimination and the webpage contains a link to the district's nondiscrimination statement. The district also has a Labor Relations Unit to collaborate with unions in negotiations and an Office of Administrative Hearings. Interviews did not reveal any discriminatory employment practices. No evidence of noncompliance was found.

Required Corrective Action(s):

None

December 30, 2024

Mr. Pedro Martinez
Chicago Public Schools District 299
42 W Madison St 2nd Floor
Chicago, IL 60602

Dear Mr. Martinez:

Thank you for taking the time to assist the Illinois State Board of Education (ISBE) during our on-site civil rights compliance review of Sullivan High School conducted on November 09, 2023.

As a recipient of federal financial assistance, Sullivan High School 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.

Sullivan High School was selected for review based on ISBE'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.

Summary of Findings from On-site Review of Sullivan High School conducted on
November 09, 2023

I. Administrative Requirements

A. Annual Notice of nondiscrimination

Applicable Requirements:

Guidelines Section IV.O.

Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or disability. Announcement of this policy of nondiscrimination may be made, for example, in local newspapers, recipient publications, and/or other media. The notice must include a brief summary of program offerings and admission criteria, as well as the name, office address, and phone number of the person(s) designated to coordinate compliance under Title IX, Section 504, and Title II. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Summary of Findings and Analysis:

ISBE reviewed evidence submitted by the district, reviewed the district and school websites, and interviewed school and district representatives. The district provided a link to their Non-Discrimination Statement; an upload of the district's Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy; an upload of instructions for posting non-discrimination materials; and the district's Non-Discrimination Statement flyer. The Non-Discrimination statement is found under the district's "About" section on the district home page. The statement does provide protection for sexual orientation, gender or sex (includes gender identity, gender expression, pregnancy, childbirth, breastfeeding, and pregnancy related medical conditions), race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, marital status, registered domestic partner status, genetic information, political belief or affiliation (not union related), military status, unfavorable discharge from military service, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics. All of the required protected bases of nondiscrimination are covered by this statement. The

statement also includes contact information for the Office of Student Protections, Title IX Coordinator, Section 504 Coordinator, Office of Inspector General, and U.S. Department of Education's Office of Civil Rights. However, this statement does not contain a brief summary of CTE program offerings and admission criteria. Additionally, the district does serve a community of national origin minority persons with limited English language skills but does not provide a statement that the district will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

Required Corrective Action(s):

Revise, modify, or create a new notice of non-discrimination to address the requirements of the Annual Notice of Nondiscrimination requirement found in "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) (34 C.F.R. Part 100, Appendix B, IV.O). This statement must include a brief summary of CTE programs offerings and admission criteria and a statement assuring that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

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. A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees, and unions, that it does not discriminate on the basis of race, color, national origin, sex, or disability. The notice must identify the employees designated to coordinate compliance under Title IX, Section 504, and Title II. If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of this nondiscrimination policy.

Summary of Findings and Analysis:

ISBE reviewed the evidence submitted by the district, the district and school websites, and interviewed district and school representatives. The district provided a link to their Non-Discrimination Statement; an upload of the district's Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy; an upload of instructions for posting non-discrimination materials; and the district's Non-Discrimination Statement flyer. The Non-Discrimination statement is found under the district's "About" section on the district home page. The statement does provide protection for sexual orientation, gender or sex (includes gender identity, gender expression, pregnancy, childbirth, breastfeeding, and

pregnancy related medical conditions), race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, marital status, registered domestic partner status, genetic information, political belief or affiliation (not union- related), military status, unfavorable discharge from military service, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics. All of the required protected bases of nondiscrimination are covered by this statement. The statement also includes contact information for the Office of Student Protections, Title IX Coordinator, Section 504 Coordinator, Office of Inspector General, and U.S. Department of Education's Office of Civil Rights. The statement provides more than sufficient information to meet the requirements of a continuous notice of nondiscrimination.

However, ISBE reviewed the major publications and recruitment materials on both the district website and the school website and found no evidence of a continuous notice of nondiscrimination that meets all requirements on these documents. On the district's CTE webpage, there is a link to the Non-Discrimination statement, but the page also contains several links to recruitment materials such as "Guide to CTE", the "CTE Matrix", and the "CTE Certification List". On the school website, the school has a student handbook that contains an "Equal Employment Opportunity" section on page 51, but this section is primarily aimed at employment rather than student's access to programs and activities. None of these documents contained a continuous notice of nondiscrimination that meet all requirements.

Required Corrective Action(s):

Provide a continuous notice of nondiscrimination on major publications and recruitment materials published by the district and schools that meets the requirements outlined in 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106. This statement should include a notice that the district does not discriminate on the basis of race, color, national origin, sex, or disability. Additionally, the notice should contain the name/title, email, phone, and address of the Title IX and Section 504 coordinator.

C. Designation of Compliance Coordinators

Applicable Requirements:

34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a).

A recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under those laws and regulations, including investigations of complaints alleging noncompliance.

Summary of Findings and Analysis:

ISBE reviewed evidence provided by the district, reviewed the district and school websites, and interviewed district and school representatives. The district has properly designated coordinators for compliance activities for both Title IX and Section 504. The district also has an Office of Student Protections that coordinate compliance efforts for these activities and there are liaisons at each of the schools to provide guidance on these compliance activities and information. During the on-site review, ISBE observed postings throughout the building providing contact information for the Office of Student Protections and information about the protections for students under these laws and regulations. Interviews revealed an awareness of students, teachers, staff, and administrators of who to contact in order to file a complaint or grievance in compliance with the laws and regulations. No evidence of noncompliance was found.

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).

A recipient shall adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

Summary of Findings and Analysis:

ISBE reviewed the evidence provided by the districts, reviewed the district and school websites, and interviewed district and school representatives. The grievance procedures are outlined in the OSP Procedure Manual, and the adult grievance process is outlined in the EOCO Procedure Manual which are available on the district website. Additionally, ISBE observed posters throughout the building providing a nondiscrimination statement that included information on where to find the grievance procedures and who to contact in order to file a complaint. Interviews revealed a general understanding of students, teachers, staff, and administrators of where to find the grievance procedures and who to contact. The grievance procedures included all required components. No evidence of noncompliance was found.

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)-(b), 106.34 and 106.35; 28 C.F.R. § 35.130.

A recipient may not develop, impose, maintain, approve, or implement admissions criteria that unlawfully discriminate on the basis of race, color, national origin, sex, or disability. However, if a recipient can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory. Recipients may not deny students with disabilities access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory but, where possible, a recipient must adjust those requirements to the needs of students with disabilities.

Access to vocational programs or courses may not be denied to students with disabilities on the ground that employment opportunities in any occupation or profession may be more limited for individuals with disabilities than for individuals without disabilities. A recipient may not separate students by sex or deny a student access to a class or program based on their sex unless expressly authorized by Title IX or its implementing regulations.

Summary of Findings and Analysis:

ISBE reviewed evidence submitted by the district, reviewed the district website, and interviewed students, teachers, counselors, and administrators regarding the admission process into CTE programs. The district provided the admission criteria for selective academies and the criteria were not found to be unlawfully discriminatory. The district also provides a website that allows students to search schools in which to register with various search parameters including the CTE programs available. Interviews with students, teachers, staff, and administrators did not reveal any examples of unlawful barriers to access to classes. No evidence of noncompliance was found.

Required Corrective Action(s):

None

B. Access for National Origin Minority Students with Limited English Language SkillsApplicable Requirements:

Guidelines Section IV.L.

Recipients may not restrict admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction.

Summary of Findings and Analysis:

ISBE reviewed the district's website and interviewed students, teachers, counselors, and administrators. The district offers English language supports to ensure that students have access to CTE courses and programs, and the review of data reveals that English Learner students are participating in these opportunities. Interviews did not reveal any barriers to admission to CTE programs based on English language skills. No evidence of noncompliance was found.

Required Corrective Action(s):

None

C. Counseling and Prospects for SuccessApplicable Requirements:

Guidelines Sections V.A and B; 34 C.F.R. §§ 100.3(a) and (b); 104.37(b), and 106.36 Recipients must ensure that their counseling materials and activities do not discriminate on the basis of race, color, national origin, sex, or disability. Recipients must ensure that counselors do not steer any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or students with disabilities, recipients must take steps to ensure that the disproportion does not result from unlawful discrimination in counseling activities.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, counselors, and administrators. Interviews did not reveal any evidence of counseling

materials and activities being provided in a discriminatory manner or evidence of steering students into a particular program. No evidence of noncompliance was found.

Required Corrective Action(s):

None

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

Applicable Requirements:

Guidelines Section V.D; 34 C.F.R. §§ 100.3(a)- (b) and 104.37(b).
Recipients must ensure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

Summary of Findings and Analysis:

ISBE reviewed the school and district website and interviewed students, teachers, counselors, and administrators. The school has access to translation services and ensures that all students can effectively communicate with their counselors regardless of national origin or disability. No evidence of noncompliance was found.

Required Corrective Action(s):

None

E. Recruitment and Promotional Activities

Applicable Requirements:

Guidelines Sections V.A, V.C, and V.E.
Recipients must take steps to ensure that their promotional and recruitment efforts do not discriminate or perpetuate stereotypes or limitations on the basis of race, color, national origin, sex, or disability. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, counselors, and administrators. The recruitment material available on the district and school website did not perpetuate stereotypes and interviews did not reveal any evidence of discriminatory practices in the recruitment process. No evidence of noncompliance was found.

Required Corrective Action(s):

None

III. Physical Accessibility for Students with Disabilities

Applicable Requirements:

2. Forward Reach
 1. Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

Summary of Findings and Analysis:

ISBE reviewed the facilities and found that the Automated External Defibrillator (AED) mounted outside of the office was placed at a height that exceeded the maximum forward reach of 48 inches to the operable feature. The AED is an added feature and should comply with 2010 ADA Standards which were applicable when it was installed.

Required Corrective Action(s):

Please see the attached facility report for required corrective actions.

IV. Comparable Facilities

Applicable Requirements:

Guidelines Section VI.D; 34 C.F.R. § 106.33.

Recipients must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex. Such facilities must be adapted or modified to the extent necessary to make the vocational education program readily accessible to individuals with disabilities.

Summary of Findings and Analysis:

ISBE reviewed the school and district website, reviewed the facilities, and interviewed students, teachers, counselors, and administrators. The changing rooms and shower facilities provided to male and female students were found to be comparable. Modifications were in place to ensure access for students with disabilities.

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. Recipients may not deny students with disabilities access to vocational education programs or courses because of the need for related aids and services or auxiliary aids. If necessary, recipients must modify instructional equipment; modify or adapt the manner in which the courses are offered; provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary students with disabilities; and provide related aids or services that assure secondary students an appropriate education. Recipients must place secondary level students with disabilities in the regular educational environment of any vocational education program to the maximum extent appropriate to the needs of the student unless it can be demonstrated that the education of the student with a disability in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily.

Summary of Findings and Analysis:

ISBE reviewed the school and district website and interviewed students, teachers, counselors, and administrators. Interviews revealed several examples of accommodations provided to students to ensure that they could actively participate in CTE programs. No evidence of noncompliance was found.

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 Recipients generally may not award financial assistance to vocational education students on the basis of race, color, national origin, sex, or disability. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, staff, and administrators. The district does provide a fee waiver to students that is guided to by board policy 408.1. There is no evidence that this is provided in a discriminatory way and the qualifications for this waiver are communicated to families. No evidence of noncompliance was found.

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).
A recipient must ensure that it does not discriminate on the basis of race, color, national origin, sex, or disability in making available opportunities in cooperative education, work study and job placement programs. Recipients must also ensure that students participating in cooperative education, work study and job placement programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay. A recipient may not cooperate with an employer that requests students on the basis of sex, race, color, national origin, or disability status.

Summary of Findings and Analysis:

ISBE reviewed the district and school websites and interviewed students, teachers, counselors, and administrators. The district offers a variety of work-based learning opportunities including the Chicago Police and Fire Training Academy, Chicago Builds, Genesys Works, and other internship and placement opportunities. The district coordinates with each of these programs to ensure that students rights are protected, and the opportunities appear to be available to student in a nondiscriminatory manner. No evidence of noncompliance was found.

Required Corrective Action(s):

None

VIII. EmploymentApplicable Requirements:

Guidelines Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51- 106.61
Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of race, color, national origin, sex, or disability. Recipients generally may not make pre-employment inquiries concerning disability or marital status.

Summary of Findings and Analysis:

ISBE reviewed the district and school websites and interviewed students, teachers, counselors, and administrators. The district provides a website to oversee employment opportunities and a job board. Each of the jobs listed contains a notice of non-discrimination and the webpage contains a link to the district's nondiscrimination statement. The district also has a Labor Relations Unit to collaborate with unions in negotiations and an Office of Administrative Hearings. Interviews did not reveal any discriminatory employment practices. No evidence of noncompliance was found.

Required Corrective Action(s):

None

December 30, 2024

Mr. Pedro Martinez
Chicago Public Schools District 299
42 W Madison St 2nd Floor
Chicago, IL 60602

Dear Mr. Martinez:

Thank you for taking the time to assist the Illinois State Board of Education (ISBE) during our on-site civil rights compliance review of Infinity Math Science & Tech HS conducted on October 25, 2023.

As a recipient of federal financial assistance, Infinity Math Science & Tech HS 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.

Infinity Math Science & Tech HS was selected for review based on ISBE'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.

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


- I. Administrative Requirements;
- II. Recruitment, Admissions, and Counseling
- III. Accessibility: See Attachment III: Facilities Review
- 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. All required corrective action must be included in Infinity Math Science & Tech HS's Voluntary Compliance Plan (VCP). The district can develop its Voluntary Compliance Plan in the Methods of Administration Civil Rights system in IWAS. At a minimum, your VCP should address every item of noncompliance, describe the corrective action that your district 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 ISBE. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. Please submit your completed VCP to ISBE by February 28, 2025. We will review the VCP, and either approve it as submitted, or work with you to ensure that the appropriate corrective action is taken to bring your school into compliance. We encourage you to await approval of your VCP from ISBE prior to completing corrective action or any repairs.

Thank you again for your cooperation during the on-site review. Your time and effort in organizing documents for the ISBE's review and scheduling interviews was much appreciated. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements.

If you have any questions regarding this LOF or if you need any assistance preparing your VCP, please email MOA@isbe.net.

Sincerely,


Marci Johnson
Director of CTE and Innovation

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.

Summary of Findings from On-site Review of Infinity Math Science & Tech HS
conducted on October 25, 2023

I. Administrative Requirements

A. Annual Notice of nondiscrimination

Applicable Requirements:

Guidelines Section IV.O.

Prior to the beginning of each school year, recipients must advise students, parents, employees, and the general public that all vocational opportunities will be offered without regard to race, color, national origin, sex, or disability. Announcement of this policy of nondiscrimination may be made, for example, in local newspapers, recipient publications, and/or other media. The notice must include a brief summary of program offerings and admission criteria, as well as the name, office address, and phone number of the person(s) designated to coordinate compliance under Title IX, Section 504, and Title II. If a recipient's service area contains a community of national origin minority persons with limited English language skills, public notification materials must be disseminated to that community in its language and must state that recipients will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in vocational education programs.

Summary of Findings and Analysis:

ISBE reviewed evidence submitted by the district, reviewed the district and school websites, and interviewed school and district representatives. The district provided a link to their Non-Discrimination Statement; an upload of the district's Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy; an upload of instructions for posting non-discrimination materials; and the district's Non-Discrimination Statement flyer. The Non-Discrimination statement is found under the district's "About" section on the district home page. The statement does provide protection for sexual orientation, gender or sex (includes gender identity, gender expression, pregnancy, childbirth, breastfeeding, and pregnancy related medical conditions), race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, marital status, registered domestic partner status, genetic information, political belief or affiliation (not union-related), military status,

unfavorable discharge from military service, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics. All of the required protected bases of nondiscrimination are covered by this statement. The statement also includes contact information for the Office of Student Protections, Title IX Coordinator, Section 504 Coordinator, Office of Inspector General, and U.S. Department of Education's Office of Civil Rights. However, this statement does not contain a brief summary of CTE program offerings and admission criteria. Additionally, the district does serve a community of national origin minority persons with limited English language skills but does not provide a statement that the district will take steps to assure that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

Required Corrective Action(s):

Revise, modify, or create a new notice of non-discrimination to address the requirements of the Annual Notice of Nondiscrimination requirement found in "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) (34 C.F.R. Part 100, Appendix B, IV.O).

This statement must include a brief summary of CTE programs offerings and admission criteria and a statement assuring that the lack of English language skills will not be a barrier to admission and participation in CTE programs.

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.

A recipient must take continuing steps to notify participants, beneficiaries, applicants, employees, and unions, that it does not discriminate on the basis of race, color, national origin, sex, or disability. The notice must identify the employees designated to coordinate compliance under Title IX, Section 504, and Title II. If a recipient publishes or uses recruitment materials or publications containing general information that it makes available to participants, beneficiaries, applicants, or employees, it shall include in those materials or publications a statement of this nondiscrimination policy.

Summary of Findings and Analysis:

ISBE reviewed the evidence submitted by the district, the district and school websites, and interviewed district and school representatives. The district provided a link to their Non-Discrimination Statement; an upload of the district's Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and

Retaliation Policy; an upload of instructions for posting non-discrimination materials,; and the district's Non-Discrimination Statement flyer. The Non-Discrimination statement is found under the district's "About" section on the district home page. The statement does provide protection for sexual orientation, gender or sex (includes gender identity, gender expression, pregnancy, childbirth, breastfeeding, and pregnancy related medical conditions), race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, marital status, registered domestic partner status, genetic information, political belief or affiliation (not union- related), military status, unfavorable discharge from military service, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics. All of the required protected bases of nondiscrimination are covered by this statement. The statement also includes contact information for the Office of Student Protections, Title IX Coordinator, Section 504 Coordinator, Office of Inspector General, and U.S. Department of Education's Office of Civil Rights. The statement provides more than sufficient information to meet the requirements of a continuous notice of nondiscrimination.

However, ISBE reviewed the major publications and recruitment materials on both the district website and the school website and found no evidence of a continuous notice of nondiscrimination on these documents. On the district's CTE webpage, there is a link to the Non-Discrimination statement but the page also contains several links to recruitment materials such as "Guide to CTE", the "CTE Matrix", and the "CTE Certification List". The school website did not contain any documents but rather linked to district materials such as the Student Code of Conduct, District Calendar, and District Lunch Menu.

Required Corrective Action(s):

Provide a continuous notice of nondiscrimination on major publications and recruitment materials published by the district and schools that meets the requirements outlined in 34 C.F.R. §§ 100.6(d), 104.8, and 106.9; and 28 C.F.R. § 35.106. This statement should include a notice that the district does not discriminate on the basis of race, color, national origin, sex, or disability. Additionally, the notice should contain the name/title, email, phone, and address of the Title IX and Section 504 coordinator.

C. Designation of Compliance Coordinators

Applicable Requirements:

34 C.F.R. §§ 104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a).

A recipient shall designate at least one employee to coordinate its efforts to comply

with and carry out its responsibilities under those laws and regulations, including investigations of complaints alleging noncompliance.

Summary of Findings and Analysis:

ISBE reviewed evidence provided by the district, reviewed the district and school websites, and interviewed district and school representatives. The district has properly designated coordinators for compliance activities for both Title IX and Section 504. The district also has an Office of Student Protections that coordinate compliance efforts for these activities and there are liaisons at each of the schools to provide guidance on these compliance activities and information. During the on-site review, ISBE observed postings throughout the building providing contact information for the Office of Student Protections and information about the protections for students under these laws and regulations. Interviews revealed an awareness of students, teachers, staff, and administrators of who to contact in order to file a complaint or grievance in compliance with the laws and regulations. No evidence of noncompliance was found.

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).

A recipient shall adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

Summary of Findings and Analysis:

ISBE reviewed the evidence provided by the districts, reviewed the district and school websites, and interviewed district and school representatives. The grievance procedures are outlined in the OSP Procedure Manual and the adult grievance process is outlined in the EOCO Procedure Manual which are available on the district website. Additionally, ISBE observed posters throughout the building providing a nondiscrimination statement that included information on where to find the grievance procedures and who to contact in order to file a complaint. Interviews revealed a general understanding of students, teachers, staff, and administrators of

where to find the grievance procedures and who to contact. The grievance procedures included all required components. No evidence of noncompliance was found.

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)-(b), 106.34 and 106.35; 28 C.F.R. § 35.130.

A recipient may not develop, impose, maintain, approve or implement admissions criteria that unlawfully discriminate on the basis of race, color, national origin, sex or disability. However, if a recipient can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory. Recipients may not deny students with disabilities access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory but, where possible, a recipient must adjust those requirements to the needs of students with disabilities.

Access to vocational programs or courses may not be denied to students with disabilities on the ground that employment opportunities in any occupation or profession may be more limited for individuals with disabilities than for individuals without disabilities. A recipient may not separate students by sex or deny a student access to a class or program based on their sex unless expressly authorized by Title IX or its implementing regulations.

Summary of Findings and Analysis:

ISBE reviewed evidence submitted by the district, reviewed the district website, and interviewed students, teachers, counselors, and administrators regarding the admission process into CTE programs. The district provided the admission criteria for

selective academies and the criteria were not found to be unlawfully discriminatory. The district also provides a website that allows students to search schools in which to register with various search parameters including the CTE programs available. Interviews with students, teachers, staff, and administrators did not reveal any examples of unlawful barriers to access to classes. No evidence of noncompliance was found.

Required Corrective Action(s):

None

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

Applicable Requirements:

Guidelines Section IV.L.

Recipients may not restrict admission to vocational education programs because the applicant, as a member of a national origin minority with limited English language skills, cannot participate in and benefit from vocational instruction to the same extent as a student whose primary language is English. It is the responsibility of the recipient to identify such applicants and assess their ability to participate in vocational instruction.

Summary of Findings and Analysis:

ISBE reviewed the district's website and interviewed students, teachers, counselors, and administrators. The district offers English language supports to ensure that students have access to CTE courses and programs and the review of data reveals that English Learner students are participating in these opportunities. Interviews did not reveal any barriers to admission to CTE programs based on English language skills. No evidence of noncompliance was found.

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 Recipients must ensure that their counseling materials and activities do not discriminate on the basis of race, color, national origin, sex or disability. Recipients must ensure that counselors do not steer any student to enroll in a particular career or program, or measure or predict a student's prospects for success in any career or program, based upon the student's race, color, national origin, sex, or disability. If a vocational program disproportionately enrolls male or female students, minority or nonminority students, or students with disabilities, recipients must take steps to ensure that the disproportion does not result from unlawful discrimination in counseling activities.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, counselors, and administrators. Interviews did not reveal any evidence of counseling materials and activities being provided in a discriminatory manner or evidence of steering students into a particular program. No evidence of noncompliance was found.

Required Corrective Action(s):

None

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

Applicable Requirements:

Guidelines Section V.D; 34 C.F.R. §§ 100.3(a)- (b) and 104.37(b). Recipients must ensure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing impairments. This requirement may be satisfied by having interpreters available.

Summary of Findings and Analysis:

ISBE reviewed the school and district website and interviewed students, teachers, counselors, and administrators. The school has access to translation services and has worked to hire staff that are bilingual to support students with limited English skills. No evidence of noncompliance was found.

Required Corrective Action(s):

None

E. Recruitment and Promotional ActivitiesApplicable Requirements:

Guidelines Sections V.A, V.C, and V.E.

Recipients must take steps to ensure that their promotional and recruitment efforts do not discriminate or perpetuate stereotypes or limitations on the basis of race, color, national origin, sex or disability. If a recipient's service area contains a community of national origin minority persons with limited English language skills, promotional literature must be distributed to that community in its language.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, counselors, and administrators. The recruitment material available on the district and school website did not perpetuate stereotypes and interviews did not reveal any evidence of discriminatory practices in the recruitment process. No evidence of noncompliance was found.

Required Corrective Action(s):

None

III. Physical Accessibility for Students with DisabilitiesApplicable Requirements:

2010 ADA Standards for Accessible Design

308.2 Forward Reach

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

Summary of Findings and Analysis:

ISBE reviewed the school facilities and found that the emergency showers in the science rooms had emergency showers with the handle mounted above the maximum forward reach.

Required Corrective Action(s):

Please see the attached facility report for required corrective actions.

IV. Comparable Facilities

Applicable Requirements:

Guidelines Section VI.D; 34 C.F.R. § 106.33.

Recipients must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex. Such facilities must be adapted or modified to the extent necessary to make the vocational education program readily accessible to individuals with disabilities.

Summary of Findings and Analysis:

ISBE reviewed the school and district website, reviewed the facilities, and interviewed students, teachers, counselors, and administrators. The changing rooms and shower facilities provided to male and female students were found to be comparable. Modifications were in place to ensure access for students with disabilities.

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. Recipients may not deny students with disabilities access to vocational education programs or courses because of the need for related aids and services or auxiliary aids. If necessary, recipients must modify instructional

equipment; modify or adapt the manner in which the courses are offered; provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary students with disabilities; and provide related aids or services that assure secondary students an appropriate education. Recipients must place secondary level students with disabilities in the regular educational environment of any vocational education program to the maximum extent appropriate to the needs of the student unless it can be demonstrated that the education of the student with a disability in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily.

Summary of Findings and Analysis:

ISBE reviewed the school and district website and interviewed students, teachers, counselors, and administrators. Interviews revealed several examples of accommodations provided to students to ensure that they could actively participate in CTE programs. No evidence of noncompliance was found.

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 Recipients generally may not award financial assistance to vocational education students on the basis of race, color, national origin, sex, or disability. Materials and information used to notify students of opportunities for financial assistance may not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If a recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in its language.

Summary of Findings and Analysis:

ISBE reviewed the district and school website and interviewed students, teachers, staff, and administrators. The district does provide a fee waiver to students that is guided to by board policy

408.1. There is no evidence that this is provided in a discriminatory way and the

qualifications for this waiver are communicated to families. No evidence of noncompliance was found.

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).

A recipient must ensure that it does not discriminate on the basis of race, color, national origin, sex, or disability in making available opportunities in cooperative education, work study and job placement programs. Recipients must also ensure that students participating in cooperative education, work study and job placement programs are not discriminated against by employers or prospective employers on the basis of race, color, national origin, sex, or disability in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay. A recipient may not cooperate with an employer that requests students on the basis of sex, race, color, national origin or disability status.

Summary of Findings and Analysis:

ISBE reviewed the district and school websites and interviewed students, teachers, counselors, and administrators. The district offers a variety of work-based learning opportunities including the Chicago Police and Fire Training Academy, Chicago Builds, Genesys Works, and other internship and placement opportunities. The district coordinates with each of these programs to ensure that students rights are protected and the opportunities appear to be available to student in a nondiscriminatory manner. No evidence of noncompliance was found.

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


Recipients may not engage in any employment practice that discriminates against any employee or applicant for employment on the basis of race, color, national origin, sex or disability. Recipients generally may not make pre-employment inquiries concerning disability or marital status.

Summary of Findings and Analysis:

ISBE reviewed the district and school websites and interviewed students, teachers, counselors, and administrators. The district provides a website to oversee employment opportunities and a job board. Each of the jobs listed contains a notice of non-discrimination and the webpage contains a link to the district's nondiscrimination statement. The district also has a Labor Relations Unit to collaborate with unions in negotiations and an Office of Administrative Hearings. Interviews did not reveal any discriminatory employment practices. No evidence of noncompliance was found.

Required Corrective Action(s):

None

	Photo	Accessibility Violation	Applicable Standard	Required Corrective Action
		<p>ISBE reviewed the facilities at Hubbard High School and found that one of the restroom stalls in a restroom designated as accessible did not provide a rear grab bar that aligns with 609 as required by 604.5.</p>	<p>2010 ADA Standards</p> <p>604.5 Grab Bars. Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall.</p> <p>609 Grab Bars</p> <p>609.1 General. Grab bars in toilet facilities and bathing facilities shall comply with 609.</p> <p>609.2 Cross Section. Grab bars shall have a cross section complying with 609.2.1 or 609.2.2.</p> <p>609.2.1 Circular Cross Section. Grab bars with circular cross sections shall have an outside diameter of 1 1/4 inches (32 mm) minimum and 2 inches (51 mm) maximum.</p> <p>609.2.2 Non-Circular Cross Section. Grab bars with non-circular cross sections shall have a cross-section dimension of 2 inches (51 mm) maximum and a perimeter dimension of 4 inches (100 mm) minimum and 4.8 inches (120 mm) maximum.</p> <p>Figure 609.2.2 Figure (a) shows a handrail with an approximately square cross section and figure (c) shows an elliptical cross section. The largest cross section dimension is 2 inches (51 mm) maximum. The perimeter dimension must be 4 to 4.8 inches (100 to 120 mm).</p> <p>Grab Bar Non-Circular Cross Section</p> <p>609.3 Spacing. The space between the wall and the grab bar shall be 1 1/2 inches (38</p>	<p>Ensure that the restroom stall has a grab bar on the rear wall complying with 2010 ADA Design Standards 609.</p>

mm). The space between the grab bar and projecting objects below and at the ends shall be 1 1/2 inches (38 mm) minimum. The space between the grab bar and projecting objects above shall be 12 inches (305 mm) minimum.

EXCEPTION: The space between the grab bars and shower controls, shower fittings, and other grab bars above shall be permitted to be 1 1/2 inches (38 mm) minimum.

Figure 609.3

A grab bar is shown with a projecting object mounted above and below it.

Projecting objects must be spaced 1 1/2 inch (38 mm) minimum below and 12 inches (305 mm) minimum above the grab bar.

Recessed objects can be spaced immediately above and below.

Spacing of Grab Bars

609.4 Position of Grab Bars.

Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.

609.5 Surface Hazards. Grab bars and any wall or other surfaces adjacent to grab bars shall be free of sharp or abrasive elements and shall have rounded edges.

609.6 Fittings. Grab bars shall not rotate within their fittings.

609.7 Installation. Grab bars shall be installed in any manner that provides a gripping surface at the specified locations and that does not obstruct the required clear floor space.

609.8 Structural Strength. Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the grab bar, fastener, mounting device, or supporting structure.

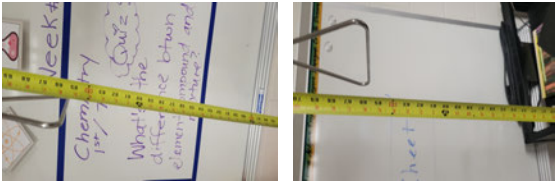
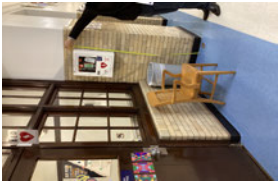
	Photo	Accessibility Violation	Applicable Standard	Required Corrective Action
1		<p>ISBE reviewed the school facilities and found that the emergency showers in the science rooms had emergency showers with the handle mounted above the maximum forward reach.</p>	<p>2010 ADA Standards for Accessible Design 308.2 Forward Reach</p> <p>308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.</p>	<p>Provide handles for emergency showers within the allowable forward reach range.</p>

	Photo	Accessibility Violation	Applicable Standard	Required Corrective Action
1		<p>ISBE reviewed the facilities and found that the Automated External Defibrillator (AED) mounted outside of the office was placed at a height that exceeded the maximum forward reach of 48 inches to the operable feature. The AED is an added feature and should comply with 2010 ADA Standards which were applicable when it was installed.</p>	<p>308.2 Forward Reach 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.</p>	<p>Provide an AED mounted within the forward reach range found in 2010 ADA 308.2.</p>