

California Postsecondary Methods of Administration (MOA) 2025 Biennial Report

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Introduction

The report includes a summary of the Chancellor's Office MOA program, as well as **five (5)** letters of findings and five of six corrective action plans from the colleges reviewed.

Colleges Selected for Review

Number	Region	College
1	Los Angeles	Cerritos College
2	Los Angeles	Mount San Antonio College (Mt. SAC)
3	Orange County	Saddleback College
4	Inland Empire/Desert	San Bernardino Valley College (SBVC)
5	San Diego/Imperial	San Diego City College (SDCC)

Review Timeline

- Notification Letters sent to four Colleges: Aug. 26, 2024.
- Virtual Reviews/Desk Audits:
 - Nov. 4-8, 2024 (Cerritos & SDCC)
 - Nov. 8-22, 2024 (Saddleback)
 - SBVC was given an extension for their review up until July 21, 2025, because of time conflicts.
- Notification Letter sent to one College: April 1, 2025 (Mt. SAC)
- Letters of Findings (LOFs) Issued:
 - Nov. 12, 2024 (Cerritos)
 - Jan. 7, 2025 (Saddleback)
 - Jan. 24, 2025 (SDCC)
 - July 21, 2025 (Mt. SAC)
 - Aug. 20, 2025 (SBVC)
- Corrective Action Plans (CAPs), also referred to as Voluntary Compliance Plan (VCP), due to Chancellor's Office (30 days after LOFs issued):
 - Dec. 20, 2024 (Cerritos)
 - Feb. 6, 2025 (Saddleback)
 - Feb. 21, 2025 (SDCC)

- CAPs due to Chancellor's Office (45 days after LOFs issued):
 - This update was made after a review of the MOA State Plan, where we state we will give 45 days to respond, so we adopted it with the reviews conducted in 2025.
 - Sept. 4, 2025 (Mt. SAC)
 - Oct. 11, 2025 (SBVC)
- Chancellor's Office Report Due to OCR: Dec. 31, 2025

MOA Program Updates

As of May 6, 2024, the Chancellor's Office Perkins program has onboarded a new MOA staff, a limited-term staff left later that month, and the Dean changed in Feb. 2025. A total of three (3) staff resources were allocated by the California Community Colleges Chancellor's Office to the MOA compliance program: one (1) Perkins Dean and MOA Coordinator; one (1) MOA Program Manager/Community College Program Assistant II; and one (1) Perkins Program Analyst. The staff utilized the training materials and other in-house resources to schedule the 2024 and 2025 MOA reviews. The staff received support from the Perkins Dean as they developed additional resources such as a MOA Review General Resource Packet, providing background to the program and specific guidance on two main areas of review: Administrative Requirements and Physical Accessibility.

The full team has been trained in current information about implementing the MOA program from OCR. The Chancellor's Office followed the current MOA plan and selection criteria approved by OCR in 2020, as well as two additional criteria for the years since the last review and Perkins V core indicator performance to identify five (5) colleges to review for the Biennial Report period. Virtual desk audits were conducted for the colleges with an on-site visit offered for the Physical Accessibility area of review; one college had an on-site visit.

Staff have been able to close out 10 of the 23 active MOA Reviews. Through follow-up and technical assistance, staff were able to confirm through photo or other documentation that corrective action items were completed.

OCR Responses to 2023 MOA Biennial Report

The United States Department of Education Office for Civil Rights (OCR) recently provided feedback on civil rights reviews conducted by the Chancellor's Office of community college districts for program years 2021-22 and 2022-23, as well as the 2023 MOA reviews. OCR commended the Chancellor's Office ability to issue written findings and negotiate compliance plans in a timely manner so that violations can be promptly remedied. OCR also commended the ability to select subrecipients and MOA issue areas to review based on risk(s) of civil rights noncompliance and supported by data analysis. Another strength noted was the ability to conduct skillful, probing investigations that involved reviewing key relevant documents, interviewing appropriate individuals, and seeking explanations

for observed inequities. OCR also appreciated the agency’s diligence in reviewing and responding to its feedback.

OCR did identify several potential areas of improvement for the agency’s MOA program. Outlined in the table below are the Chancellor’s Office responses to OCR’s recommendations:

OCR’s Recommendation	Chancellor’s Office Response
Clearly identifying physical accessibility violation findings, including compliance standards with appropriate citations to the Guidelines and regulations, so that subrecipients understand the violations and how to correct them.	The Chancellor’s Office has included the specific Applicable Accessibility Standards (year and section) in the LOF and CAPs.
Describing required corrective actions in more detail... Moving forward, please take steps to ensure that LOFs list all required corrective actions for all violation findings identified by the state agency. Additionally, please provide technical assistance to these subrecipients (Allan Hancock College and Palomar College) that will assist the subrecipient in correcting the aforementioned violations.	The Chancellor’s Office provides more details in the LOF in its 2024 and 2025 MOA reviews. Technical assistance was given to Allan Hancock College, including an onsite visit on June 11, 2025. Palomar College has received technical assistance, but the application has since been updated and only asks for “Legal Last Name.”
Requesting all required information from the subrecipient before completing a compliance review and issuing an LOF.	The Chancellor’s Office requests documentation prior to the review, and if additional information is needed, it is collected prior to finalizing the LOF.

OCR also provided a supplemental response to the one pending item from the Chancellor’s Office, which was a finalized, signed VCP for the 2023 MOA review for Allan Hancock College. Outlined in the table below are the Chancellor’s Office responses to OCR’s feedback:

OCR’s Feedback	Chancellor’s Office Response
Please provide technical assistance to this subrecipient on the annual notice requirements and ensure that its annual notice meets the requirements of the MOA Guidelines.	The Chancellor’s Office provided technical assistance to Allan Hancock College, including an onsite visit on June 11, 2025.

OCR's Feedback	Chancellor's Office Response
<p>The VCP is not the place to dispute a state agency's violation findings. If any violation findings are disputed by the subrecipient, they should address those concerns with the state agency after the LOF is issued to the subrecipient and well before the VCP is negotiated and finalized. If necessary, a state agency may need to amend its LOF to address the disputed items and any findings that it made in error. A VCP must address every single finding made by the state agency in the LOF, including all physical accessibility findings.</p>	<p>The Chancellor's Office has made an effort to ensure that the final VCP does not include commentary and that all items are negotiated as appropriate.</p>
<p>The college and the state agency should negotiate a timeframe for completing the required corrective actions for each individual violation finding. Certain physical accessibility violation findings may be easy fixes (e.g., lowering a paper towel dispenser or wrapping water pipes beneath a sink). Other violation findings may require more significant work from facilities staff and/or contractors (e.g., installing an elevator). All violation findings should have a target completion date that is reasonable in light of the complexity of the required corrective action. Absent extraordinary circumstances, even complex corrective actions should be completed within two years of a finalized VCP. In the future, please do not lump all physical accessibility findings into one category and pick the same target completion date for all items, especially when the college has indicated that it will likely need more time to complete the more complex required corrective actions.</p>	<p>The Chancellor's Office negotiated with colleges when targeted completion dates exceeded two years. For past reviews where there have been several delays, staff have met with the colleges to discuss interim measures that can provide immediate changes, such as portable emergency eye washing stations being purchased rather than waiting three years for a renovation or demolition to fix/change the violations.</p>

OCR's Feedback	Chancellor's Office Response
Regarding interim measures, the state agency should make clear that the college is required to correct the violation findings identified by the state agency, in a reasonable timeframe, even if interim measures are in place at the college. The remedy and the timeframe should be negotiated between the state agency and the college before the VCP is finalized, and VCPs should not depend upon interim measures indefinitely.	The Chancellor's Office has added this statement to its LOF, "Interim measures can be implemented but should not last indefinitely—they are simply a way for the college to ensure that students are not being excluded from participation in the CTE program while the college works on more complex required corrective actions." This is also verbally explained in the Exit Interview when going through the LOF and CAP.

Technical Assistance Provided to Subrecipients

Prior to each desk audit, Chancellor's Office staff held an introductory meeting with each college selected for review to provide an overview of the MOA program. Chancellor's Office staff also provided each college's point of contact (POC) with a checklist of documents to be reviewed under each MOA issue area during the virtual desk audit week. In addition, Chancellor's Office staff provided ongoing technical assistance to each college daily answering their follow-up questions via email, phone, or virtual meetings. Chancellor's Office staff provided example indicators of compliance from past reviews and example documents to demonstrate corrective action taken such as an example the annual and continuous nondiscrimination notices.

In response to OCR's feedback, the Chancellor's Office provided technical assistance to Allan Hancock College about the annual notice of nondiscrimination. It was determined that the course catalog, provided to the public every year, was sufficient to serve as the Annual Notice, so the statement in the LOF was incorrect. However, there are still discrepancies with the notice in the catalog, so the Chancellor's Office is providing ongoing technical assistance to ensure proper compliance in a timely manner. Regarding the supplemental feedback, the findings related to Physical Accessibility required an on-site visit. In this visit, Chancellor's Office staff were able to tour both the Santa Maria and Lompoc Valley Center campuses on June 11, 2025. There were several observations made at Santa Maria regarding the parking lot van accessible spaces and one of the buildings that have since been resolved; photo documentation was provided and confirmed. The college misunderstood our request during the 2023 MOA Review and evaluated all buildings against the 2010 ADA Standards. So, at Lompoc, where the previous MOA findings were located, staff remeasured and reevaluated the 13 findings against the appropriate 1991 ADA Standards. As a result, one (1) was duplicate; one (1) was not applicable to the 1991 ADA Standards; nine (9) were marked completed; and two (2) remained pending. After consulting OCR, one of the remaining findings was determined to not be applicable as the Braille did not need to be present on the outside elevator call

buttons. The last item was confirmed corrected on July 3, 2025, for the timing of the elevator.

Finally, based on OCR's feedback, technical assistance was given to Palomar College, but the question of marital status (maiden name) on the student application had already been removed.

Copies of Written Findings and Corrective Action Plans for Subrecipients

CERRITOS COLLEGE

- Notification Letter
- Letter of Findings
- Corrective Action Plan

MOUNT SAN ANTONIO COLLEGE

- Notification Letter
- Letter of Findings
- Letter of Findings – Amendment
- Corrective Action Plan

SADDLEBACK COLLEGE

- Notification Letter
- Letter of Findings
- Corrective Action Plan

SAN BERNARDINO VALLEY COLLEGE

- Notification Letter
- Letter of Findings
- Corrective Action Plan

SAN DIEGO CITY COLLEGE

- Notification Letter
- Letter of Findings
- Corrective Action Plan