

EGMS PROGRAM CHECKLIST

Program Name: **CIVIL RIGHTS**

For resources and sample materials for each item on the Civil Rights checklist, visit: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights>.

Item #	Review Item Title	Item Description	Evidence Item # (letter)	Evidence Description
14.1	Section 504	The LEA identifies, evaluates, and places students with disabilities in compliance with Section 504 and has implemented the legal standards under the ADA Amendments Act of 2008 (such as changes regarding major life activities, mitigating measures, etc.). The LEA receives parental consent before all initial evaluations and initial placements under Section 504. The LEA ensures that evaluation and placement decisions are made by a group of persons, including persons who are knowledgeable about the student, the meaning of the evaluation data, and placement options. The LEA provides all necessary accommodations, related aids, and services for students with disabilities, including students with health conditions who may also be served by a health plan. Resources and Technical Assistance for 14.1 Risk Score: 3 Legal authority: Section 504, 34 C.F.R. Part 104; RCW 28A.642.010.	A	<i>Submit the below Section 504 documentation for two students at an elementary school, middle/junior high school, high school, online or ALE program, and alternative school (where applicable). Submitted evidence must include at least one student with a health condition (e.g., diabetes, allergies, etc.).</i> Section 504 plan documentation, including the following: 1. Parent consent for initial evaluation. 2. Evaluation documentation. 3. Parent consent for initial placement. 4. Section 504 plans. 5. Evidence of manifestation determination meetings (if applicable).

Program Review & Support (formerly CPR) 2026–27

14.2	Language Access (Interpretation and Translation Services)	The LEA communicates with all limited-English proficient parents (LEP) in a language they can understand, which includes providing qualified and competent adult interpreters to communicate with LEP parents and translating vital documents when a significant percentage of the population in a school or LEA needs the information in a language other than English. If there is a small number of parents with particular language needs, or if a school or LEA is unable to translate a document because of undue expense, the LEA still otherwise provides the information to parents in a language they can understand (i.e., through oral interpretation). The LEA ensures that interpreters and translators have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue and are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality. Resources and Technical Assistance for 14.2 Risk Score: 3 Legal authority: Title VI, 34 C.F.R. Sec.100.3; Lau v. Nichols, 414 U.S. 563 (1974); RCW 28A.642.010.	A	<i>Submit evidence even if the LEA has not identified any limited-English proficient (LEP) parents.</i> Evidence or a description of the process the LEA uses to identify LEP parents, including either a home language survey or questions about home language on a student enrollment form.
			B	<i>Submit evidence only if the LEA has identified LEP parents. Otherwise, add a note to this item in EGMS stating grounds for N/A.</i> A description of the process the LEA uses to ensure that interpretation and translation services are provided to communicate vital information with LEP parents. At a minimum, the description must address: 1. How the LEA determines when interpretation services are needed (e.g., how interpretation services are requested and the types of situations

Program Review & Support (formerly CPR) 2026–27

				where interpretation services are routinely provided). - How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated). - How the LEA determines the language(s) into which documents will be translated. - How the LEA ensures its staff know how to access interpreters or translators to communicate with LEP parents.
			C	<i>Submit evidence only if the LEA has identified LEP parents. Otherwise, add a note to this item in EGMS stating grounds for N/A.</i> A description of the process the LEA uses to ensure that interpreters and translators, including LEA or school employees who perform this role, are qualified and competent to serve in the role of an interpreter or to translate documents. At a minimum, the description must address how the LEA ensures that interpreters/translators: - Have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue, and - Have training on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.

Program Review & Support (formerly CPR) 2026–27

14.3	English Language Development Services Note: For LEAs that receive Title III or TBIP funding, OSPI reviews this documentation under Title III/TBIP (Program Review Checklist 7) – no additional documentation is required for this item.	For LEAs that receive Title III or TBIP funding, OSPI reviews this documentation under Title III/TBIP (Program Review Checklist 7) – no additional documentation is required for this item. The LEA provides English language development (ELD) services to English Learners (EL) – national origin minority students with limited-English proficiency. The LEA has a process to identify, assess, and place EL students, which includes a home language survey and provisions for testing students on the state language proficiency assessment. The LEA’s ELD services are based on a sound educational theory and have been implemented effectively, including qualified staff and adequate resources and facilities. The LEA evaluates the program’s effectiveness and makes modifications as needed. Resources and Technical Assistance for 14.3 Risk Score: 3 Legal authority: Title VI, 34 C.F.R. Sec.100.3; Lau v. Nichols, 414 U.S. 563 (1974); <i>Castañeda v. Pickard</i>, 648 F.2d 989 (5th Cir. 1981); Chapter 28A.642 RCW and 392-190 WAC.	A	<i>Submit evidence even if the LEA has not identified any English Learners (ELs).</i> Evidence the LEA identifies the language background of each student upon enrollment (including the first language learned, the language the student uses most often, and the language used in the home). Evidence should include a home language survey or student enrollment form with the required questions.
			B	<i>Submit evidence even if the LEA has not identified any ELs.</i> Assessment and placement procedures for English Language Development (ELD) services, including testing on the state language proficiency assessment and criteria for determining eligibility and exit.

Program Review & Support (formerly CPR) 2026–27

			C	<i>Submit evidence only if the LEA has identified ELs.</i> A roster of eligible EL students, indicating language proficiency level and the type and amount of ELD services provided for each student.
			D	<i>Submit evidence only if the LEA has identified ELs.</i> A list of all teachers who design, oversee, and evaluate ELD services. For each teacher listed, provide their qualifications to provide EL services, such as EL/ESL endorsement or ongoing training relating to the delivery of ELD services.
			E	<i>Submit evidence only if the LEA has identified ELs.</i> A list of all paraeducators who assist in providing ELD services. For each paraeducator listed, provide evidence that they instruct under the direct supervision of a qualified teacher and receive ongoing training relating to the delivery of ELD services.
			F	<i>Submit evidence only if the LEA has identified ELs. Evidence must include documentation for two students at an elementary school, two students at a middle/junior high school, two students at a high school, two students at an ALE or online program, and two students at an alternative school, where applicable.</i> Student files with completed home language survey, placement test, and annual language proficiency assessment score sheets.
			G	<i>Submit evidence only if the LEA has identified ELs.</i> Evidence of evaluation of the effectiveness of the LEA's ELD services (e.g., progress made in language acquisition and academic achievement, feedback from teachers and parents, meeting minutes, etc.).

Program Review & Support (formerly CPR) 2026–27

14.4	Equity in Course and Program Enrollment	To ensure the LEA does not discriminate in the counseling and guidance of students, the LEA at least annually reviews disaggregated course and program enrollment data to identify disproportionalities based on sex, race, EL status, and disability (special education and Section 504). The review should include honors and advanced placement courses, career and technical education, highly capable programs, online programs, specialized programs, etc. If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination. Resources and Technical Assistance for 14.4 Risk Score: 3 Legal authority: Title IX, 34 C.F.R. Sec.106.36; Section 504, 34 C.F.R. Sec.104.34; Title VI, 34 C.F.R. Sec.100.3; RCW 28A.640.020 and 28A.642.010; WAC 392-190-010.	A	A description of the process the LEA uses to annually review disaggregated course and program enrollment data at each building to identify and address substantial disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must include: 1. When the review occurs. 2. Who is involved in the reviews. 3. How the reviews are documented. 4. Which course and programs are reviewed. 5. How the LEA or building determines whether substantial disproportionalities exist.
			B	<i>Submit evidence from two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (as applicable).</i> Evidence of implementation of the LEA's process to annually review disaggregated course and program enrollment data for the 2025–26 or 2026–27 school year. Evidence must include at least the following: 1. A summary of the disaggregated course and program enrollment data reviewed in each building (e.g., OSPI's optional worksheets, or equivalent). 2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify substantial disproportionalities.

Program Review & Support (formerly CPR) 2026–27

				3. A list of any identified substantial disproportionalities.
			C	<i>Submit evidence for the same schools selected in 14.4.B. If no substantial disproportionalities were identified, please add a note to this item in EGMS stating grounds for N/A.</i> If substantial disproportionalities were identified, evidence that the LEA or building is addressing each substantial disproportionality to ensure it is not the result of discrimination. Evidence must include the following: 1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of substantial disproportionalities (i.e., root cause analysis). 2. The LEA or building’s plan to address each substantial disproportionality to ensure it is not the result of discrimination (e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling).
14.5	Equity in Student Discipline	To ensure the LEA does not discriminate in the administration of student discipline, the LEA at least annually reviews disaggregated discipline data to identify disproportionalities based on sex, race, EL status, and disability (special education and Section 504). At a minimum, the review should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions. If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination. Resources and technical assistance for 14.5 Risk Score: 3	A	A description of the process the LEA uses to annually review disaggregated student discipline data at each building to identify and address substantial disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must include: 1. When the review occurs. 2. Who is involved in the reviews. 3. How the reviews are documented. 4. What data is reviewed. 5. How the LEA or building determines whether disproportionalities exist.

Program Review & Support (formerly CPR) 2026–27

		Legal authority: Title VI, 35 C.F.R. Sec.100.3; Section 504, 34 C.F.R. Sec.104.4; Title IX; 34 C.F.R. Sec.106.31; RCW 28A.640.010; RCW 28A.642.010; and WAC 392-190-048.		
			B	<i>Submit evidence from any two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable).</i> Evidence of implementation of the LEA's process to annually review student discipline data at each building for the 2025–26 or 2026–27 school year. Evidence must include at least the following: 1. A summary of the disaggregated student discipline data reviewed. 2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify substantial disproportionalities. 3. A list of identified substantial disproportionalities.
			C	<i>Submit evidence for the same schools selected in 14.5.B. If no substantial disproportionalities were identified, please add a note to this item in EGMS stating grounds for N/A.</i> If substantial disproportionalities were identified, evidence that the LEA or building is addressing each substantial disproportionality to ensure it is not the result of discrimination. Evidence must include the following: 1. A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of substantial disproportionalities (i.e., root cause analysis). 2. The LEA or building's plan to address each substantial disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based

Program Review & Support (formerly CPR) 2026–27

				practices reasonably calculated to address the root causes of disproportionalities).
14.6	Equity in Athletics: Accommodating Student Interests and Abilities (Three-Part Test)	Each building that offers an interscholastic athletic program equally accommodates the interests and abilities of male and female students as demonstrated in one of the following ways ("Three-Part Test"): 1. The ratio of male/female student enrollment is substantially proportionate to the ratio of male/female athletic participation, 2. The school has a history and continuing pattern of program expansion for the underrepresented sex, or 3. The school's current program fully and effectively accommodates the interests and abilities of the underrepresented sex as demonstrated by the athletic interest survey and other requests for specific sports. The LEA administers the OSPI student athletic interest survey at least once every three years at each building that offers interscholastic athletics. The LEA disaggregates and summarizes its survey results by sex and by building and considers these results when planning and developing which recreational and athletic activities to offer and when determining whether equal opportunities are available to members of both sexes. Resources and Technical Assistance for 14.6 Risk Score: 3 Legal authority: Title IX, 34 C.F.R. Sec.106.41; RCW 28A.640.020; WAC 392-190-030, 392-190-035, 392-190-040, and 392-190-045.	A	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics. Otherwise, please add a note to this item in EGMS stating grounds for N/A.</i> A complete copy of the student athletic interest survey instrument administered within the last three years, and date it was last administered.

Program Review & Support (formerly CPR) 2026–27

			B	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics. Submit evidence from two middle/junior high schools and two high schools (as applicable).</i> Student athletic interest survey results for each selected building, with a summary of student responses <i>disaggregated by sex</i> (use the OSPI's Sample Summary Worksheet or equivalent). Evidence must include at least the following: 1. The number of students surveyed. 2. The number of students enrolled (i.e., eligible to take the survey). 3. The top five sports requested, including the number of students who expressed interest in each sport. 4. The top reasons for non-participation.
			C	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics. Submit evidence for the same schools previously selected in 14.6.B.</i> A completed Three-Part Test analysis for each selected building, using OSPI's Athletic Opportunities Tool.
14.7	Equity in Athletics: Annual Athletic Evaluation and Outside Sources of Funding	The LEA provides equal opportunities and benefits for male and female students to participate in athletics. Each building that offers an athletic program conducts an annual evaluation of its athletic program to ensure that the overall benefits and treatment of the boys' and girls' athletic programs are comparable, considering the following factors: • Accommodation of interests and abilities (addressed in Item 14.6) • Coaching and tutoring • Equipment and supplies • Scheduling • Facilities • Medical services and training	A	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics. Otherwise, please add a note to this item in EGMS stating grounds for N/A.</i> A description of the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.

Program Review & Support (formerly CPR) 2026–27

		• Publicity and awards • Travel and per diem The LEA has a process in place to ensure that outside sources of athletics funding (i.e., fundraisers, donations, or booster club activities) do not result in disparities in benefits or treatment between the girls' and boys' programs. If fundraising or donations result in a disparity along gender lines, the LEA corrects the disparity, using its own funds if needed. <u>Resources and Technical Assistance for 14.7</u> Risk Score: 3 Legal authority: Title IX, 34 C.F.R. Sec.106.41; RCW 28A.640.020; WAC 392-190-030, 392-190-035, 392-190-040, and 392-190-045.		
			B	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics. Submit evidence from two middle/junior high schools and two high schools (as applicable).</i> Evidence of implementation of annual athletic evaluations for each selected building for the 2024–25 or 2025–26 school year. Evidence must include dated and completed building-level worksheets and analysis, or equivalent.

Program Review & Support (formerly CPR) 2026–27

			C	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics. Submit evidence for the same schools selected in 14.7.B. If no disparities were identified, please add a note to this item in EGMS stating grounds for N/A.</i> If the athletic evaluations identified disparities that favor one sex at any selected building, evidence that the LEA or building is taking effective steps to correct the disparity.
			D	<i>Only submit evidence if your LEA operates, sponsors, or provides interscholastic athletics.</i> A description of the LEA's process to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another.