

State Board for Community and Technical Colleges

Civil Rights Compliance Review



Lake Washington Institute of Technology
August 2013

FOREWORD

In each subsection below, the “Non-compliance” section is followed by the federal regulations citations in effect at the time of building construction or alteration. The ‘Required Action’ sections require a response. “Recommendations” do not require responses, but are intended to advise the college in ways the campus might be made more accessible to students with disabilities, without reporting a finding.

Administrative

Colleges must have certain basic requirements in place to comply with the Office for Civil Rights Guidelines, Title VI, Title IX, Section 504 and Title II. These basic procedures include an annual public notice, continuous notification, designation of a person(s) to coordinate activities under Title IX, Section 504, and Title II and a grievance procedure that will allow students and employees an avenue for dealing with alleged discrimination. Title IX; 34 CFR 106.8, 106.9, Section 504; 34 CFR 104.7, 104.8, Title II; 28 CFR 35.107, Guidelines IV-O

We commend the College for including the appropriate non-discrimination statement on its website, its winter quarter 2013 schedule, and the college catalogs.

Continuous Notification

Non-Compliance: Some documents such as brochures, flyers, applications, and publications used in recruitment or promotion of college programs do not contain a notice of non-discrimination statement; but in some cases the statement is present, by but buried deep into publications making it difficult to find. Currently, the catalog has the statement on page 236 out of 239 pages and the class schedule has it on page 48 out of 56 pages.

Title IX; 34 CFR 104.8(a) - A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the recipient that it does not discriminate on the basis of handicap in violation of Section 504 and this part. The notification shall state, where appropriate, that the recipient does not discriminate in admission or access to, or treatment or employment in, its program or activity. The notification shall also include an identification of the responsible employee designated pursuant to §104.7(a).... Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publication, and distribution of memoranda or other written communications

Section 504: 34 CFR §104.8 (b) - 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 the policy described in paragraph (a) of this section. A recipient may meet the requirement of this paragraph either by including appropriate inserts in existing materials and publications or by revising and reprinting the materials and publications.

Recommendation:

1). SBCTC recommends that the College make the non-discrimination statement easier to find (perhaps placing it closer to the beginning of the publication).

Required Action

1). The College should establish and use a consistent non-discrimination statement that includes all protected groups to be used in all written communication used in promotion or recruitment. It is acceptable to place a sticker or an insert that contains the non-discrimination statement on documents when this statement has been inadvertently omitted. The information must also be available in alternate formats for individuals with impaired vision or hearing.

Title IX/Section 504/Title II Coordinators

Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX.

No Evidence of Non-Compliance Noted: The Title II, IX and Section 504 coordinator was identified on campus. Although discussions with the individual designated indicate a good understanding regarding the responsibilities for overseeing the college's compliance with federal Civil Rights laws, the Office of Civil Rights, Department of Education wants students and employees to feel comfortable with filing complaints against the coordinator. Also, since the person responsible for mitigating risks for the College is also the Title IX and section 504 coordinator, it could be a conflict in the duties of the risk manager versus one's responsibilities to pursue section 504 and Title IX issues that could adversely affect the College. It is not necessary for the coordinator to identify his/her personal name. The identification of the coordinator's title is sufficient. We also determined that the coordinator's job description sufficiently identified the aforementioned duties.

Recommendation: In order to avoid potential conflicts of interest, SBCTC recommends that personnel other than the Executive Director of Human Resources be appointed and trained as the section 504 and Title IX coordinator. It is sufficient, if the College chooses to do so, to have more than one person fulfilling the duties. If the College chooses to have more than one person, there must be sufficient oversight.

Annual Public Notification

The annual public notice must be issued with a brief summary of the College's admissions requirements and programs offered, prior to the beginning of the school year (before Fall Session). The issuance can be done in the local newspaper, the institution's newspaper, or other publications. It also must include the College's non-discrimination statement with title and contact information for the Sec 504 and Title IX coordinator(s).

Non-Compliance:

1).Currently an "Annual Public Notification" is not being disseminated to those in the service area.

2). The College has Russian, Spanish, and Korean national origin language communities in its service area. The College has determined that these groups are significant in population.

Title IX; 34 CFR 104.8(a) - A recipient that employs fifteen or more persons shall take appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing...

34 CFR §100 Appendix B IV.O (Guidelines). - 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 handicap. Announcement of this policy of non-discrimination may be made, for example, in local newspapers, recipient publications and/or other media that reach the general public, program beneficiaries, minorities (including national origin minorities with limited English language skills), women, and handicapped persons. A brief summary of program offerings and admission criteria should be included in the announcement; also the name, address and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity. If a recipients' 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.

Required Action:

1).The College needs to publish an Annual Notice of Nondiscrimination statement, in English, prior to the beginning of the school year (before the fall session). The annual notice must include a brief summary of the program offerings and admission criteria, and the names/titles, office address, and phone number of persons designated to coordinate compliance under Title IX and section 504.

2.) The College should perform a study of the service area to determine if it contains a "community of national origin minority persons with limited English language skills". Colleges should ask the following questions as guidelines in determining if such a community exists:

- Are non-English language communities being served by the media?
- Specifically, are there television or radio stations within the area that broadcast in a language other than English?
- Are there service groups that provide assistance directed to populations with limited English language skills within the service area?

If the College can answer "yes" to one or more of these questions, then there is probably a community with limited English language skills and the College must also provide the annual notice in a language commensurate with its service area.

Grievance Procedure

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

No Evidence of Non-Compliance Noted: The College has grievance policies and procedures which are readily available to staff, faculty and students. During interviews with staff, faculty and students, we were able to ascertain that everyone knew that the policies were in place and what action they could take in the event of discrimination concerns.

Site Location and Student Eligibility Criteria

Colleges must consider the possible effects of disproportionately excluding students of a particular race, national origin, sex, or disability in the selection of sites for vocational education facilities, establishing geographic residence requirements, establishing numerical limits on students and additions to existing vocational education facilities.

No Evidence of Non-Compliance Noted: Based upon a review of College facilities, College policies and procedures for student admission to all programs, limited enrollment programs, and interviews with students and staff, no areas of non-compliance were noted.

Recruitment

Recruitment activities and materials should convey the message that all vocational programs are open to all students without regard to race, color, national origin, sex or disability status. Information about career technical education opportunities should be available to all potential students. Promotional materials should avoid stereotyping. Recruitment teams, to the extent possible, should represent persons of different races, national origins, sexes and disabilities.

No Evidence of Non-Compliance Noted: Based on a review of recruitment teams, activities, materials and interviews with recruitment staff, no violations were noted because the percentages of representation for the College's demographics for protected groups is higher than that of the 2010 Census.

34 CFR §100, Appendix B IV.O. (Guidelines) - 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.

Recipients must conduct their student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap. Where recruitment activities involve the presentation or portrayal of vocational and career opportunities, the curricula and programs described should cover a broad range of occupational opportunities and not be limited on the basis of the race, color, national origin, sex or handicap of the students or potential students to whom the presentation is made. Also, to the extent possible, recruiting teams should include persons of different races, national origins, sexes, and handicaps.

Required Action: The College should perform a study of the service area to determine if it contains a “community of national origin minority persons with limited English language skills”. Colleges should ask the following questions as guidelines in determining if such a community exists:

- Are non-English language communities being served by the media?
- Specifically, are there television or radio stations within the area that broadcast in a language other than English?
- Are there service groups that provide assistance directed to populations with limited English language skills within the service area?

If the College can answer "yes" to one or more of these questions, then there is probably a community with limited English language skills and the college should also provide the recruiting materials in a language other than English.

Admissions

Admission policies, procedures and criteria may not exclude students from vocational programs on the basis of race, color, national origin, sex or disability. Where admissions criteria exclude a disproportionate number of persons of a particular race, color, national origin or sex or persons with disabilities, the criteria should be validated as essential to success in the program. Preadmission inquiries about marital, parental or disability status should be avoided.

No Evidence of Non-Compliance: Based on a review of materials, student enrollment demographics, and interviews with admissions staff, no violations were noted.

Student Financial Assistance

Colleges are not to limit honors, awards, and scholarships to a group on the basis of race, color, national origin, sex, or disability unless such targeting is done to provide opportunities to members of a group that has not traditionally been represented. Outside agencies that provide awards are to be notified of the college’s nondiscrimination policy.

A college may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established pursuant to domestic or foreign will, trust, bequests or similar legal instruments or by acts of a foreign government which require that awards go to a student of a particular sex, race, or national origin, or with a particular disability. However, the overall effect of such restricted awards and scholarships must not lead to discrimination in access to total scholarships on the basis of sex, race, national origin, or disability.

No Evidence of Non-Compliance Noted: Based upon a review of college financial documents and interviews with financial aid staff and students, no violations were noted.

34 CFR §100, Appendix B VI.B. (Guidelines) - Student Financial Assistance

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.

Counseling and Pre-Vocational Programs

Counseling and prevocational programs may not steer students toward particular courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.

No Evidence of Non-Compliance: Based upon a review of college documents, counseling materials and activities, and interviews with counseling staff and students, no violations were noted.

Services for Students with Disabilities

No qualified person with a disability may be excluded from, denied benefits of, or subjected to discrimination in any course, program, or activity. A recipient may not restrict access for students with disabilities to schools, programs, services, and activities because of architectural barriers, equipment barriers, the need for related aids and services, or the need for auxiliary aids. Section 504 and ADA Title II are based upon the premise that students with disabilities will be integrated with their nondisabled peers as much as possible. Historically, the assumption was made that persons with disabilities would not be able to function and the able-bodied should not put them in a position where they might be “uncomfortable.” However, research shows that gains made by persons with disabilities in the educational setting are enhanced when they are integrated with the appropriate aids and services. Students with disabilities in the collegiate setting must self-identify and may be required to provide evidence of need for accommodation from a qualified professional.

No Evidence of Non-Compliance: Based upon a review of college procedures, services provided and interviews with counseling staff and students, no serious violations were noted, but we did have some observations that we thought were worthy of recommendations.

Based on our interviews with disabled students using Disability Services, not only is Disability Services providing a wonderful service to disabled students, but the students are overwhelmingly pleased with the accessibility and accommodations made for them in order to improve their educational experiences.

Recommendation:

1) Several students with differing types of disabilities complained about a minority of instructors singling them out, expressing disdain for having to make accommodations, stressing them out about makeup exams and extra time, and even refusing to grant extra time for exams. Though it seems like only a minority of instructors are demonstrating a disdain for accommodations,

SBCTC recommends the College conduct, on an annual basis, disability sensitivity training for all faculty and staff.

2) The College should strive to ensure note takers or scribes show up for class. If note takers or scribes do not show up, there should be an alternative plan in place to ensure students have someone to provide note taking assistance to the student in class.

3). The College should ensure that for students who have been given modifications for testing, that instructors provide the proper time that students will be allowed to take their test, and that the grading is done timely so that students can know within a timely manner what their scores are.

Accessibility

Facilities constructed or altered prior to June 4, 1977 fall under the Existing Facilities standards. Facilities constructed or altered between June 4, 1977 and January 17, 1991 fall under the American National Standards Institute *Specifications for Making Buildings and Facilities Accessible to, And Usable by, The Physically Handicapped* (ANSI) standards. Facilities constructed or altered between January 18, 1991 and January 27, 1992 are subject to the *Uniform Federal Accessibility Standards* (UFAS). Under federal law, new construction or alterations started after January 27, 1992 must comply with either UFAS or *Americans with Disability Act Accessible Design Standards* (ADAADS). However, State of Washington law requires all building construction or alteration to comply with ADAADS. All parking lots are considered to have been constructed or altered after January 18, 1991 and expected to meet current standards. ADAAG is Americans with Disability Act Accessibility Guidelines. As of March 15, 2012, compliance with the 2010 Standards is required for new construction and alterations. In the period between September 15, 2010 and March 15, 2012, covered entities may choose between the 1991 Standards (without the elevator exemption for Title II facilities), the Uniform Federal Accessibility Standards (Title II facilities only), and the 2010 Standards.

Campus Wide

Campus Website:

No Evidence of Non-Compliance: Our review detected no reportable issues with the college's website due to lack of criteria at this time; but due to the Department of Justice's and the Office of Civil Rights increased emphasis on educational institutions' websites, SBCTC recommends that the College to make its website fully accessible to students with sensory impairments.

28 C.F.R. § 35.149 - Discrimination prohibited.

Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

28 C.F.R. § 35.164 - Duties.

This subpart does not require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with this subpart would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action required to comply with this subpart would result in such an alteration or such burdens, a public entity shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by the public entity.

In 2003, the Department of Justice issued a technical assistance document addressing website accessibility entitled, “[Accessibility of State and Local Government Websites to People with Disabilities](#).” This technical assistance document can be accessed on the ADA Home Page at www.ada.gov

Recommendation: The College should make its website accessible to all persons and can do so by following this helpful toolkit at www.ada.gov/pcatoolkit/chap5toolkit.htm. The College should also follow the technical assistance guidance provided at www.ada.gov/websites2.htm.

Parking

Americans with Disabilities Accessible Guidelines Standards (28 *CFR* 36) requires 2% of parking spaces to be handicap accessible with a minimum of one (1) per lot. Each parking lot is not required to have an accessible space if a nearby lot provides equal or greater accessibility. In addition, one in eight accessible spaces must be van accessible. Under the 2010 ADA Standards, which applies apply to any construction started as of March 15, 2012, one in six accessible spaces must be van accessible.

No Evidence of Non-Compliance:

The following information, picture, and table are presented only for the purpose of assisting the College in understanding the ADA parking requirements for future reference.

ADAAG: Parking - Minimum Number: 4.1.2(5) (a) and (b)

General Use Parking: If self-parking is provided for employees or visitors, each parking area/lot or structure is required to have accessible parking spaces complying with the following table (figure 1) and with 4.6.

Note: Spaces required by the table (figure 1) need not be provided in the particular area/lot or structure. They may be provided at a different location if equivalent or

greater accessibility, in terms of distance from an accessible entrance, cost and convenience, is ensured.

Figure 1

Total Parking in Area/Lot or Structure	Required Minimum Number of Accessible Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20 plus 1 for each 100 over 1000

Prior to the 2010 Standards, in addition, one in every eight accessible parking spaces (but not less than one) must be served by an access aisle at least 96 inches wide and must be designated "van accessible." After 2010 Standards, the ratio shifts to one in every six stalls must be van accessible.

ADAAG 4.1.2 Accessible Sites and Exterior - (5)(a) If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.

ADAAG Parking and Passenger Loading Zones 4.6.1 Minimum Number- Parking spaces required to be accessible by 4.1 shall comply with 4.6.2 through 4.6.5. Passenger loading zones required to be accessible by 4.1 shall comply with 4.6.5 and 4.6.6.

ADAAG 4.6.2 Location - Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances.

ADAAG 4.6.3 Parking - Spaces Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig 9).

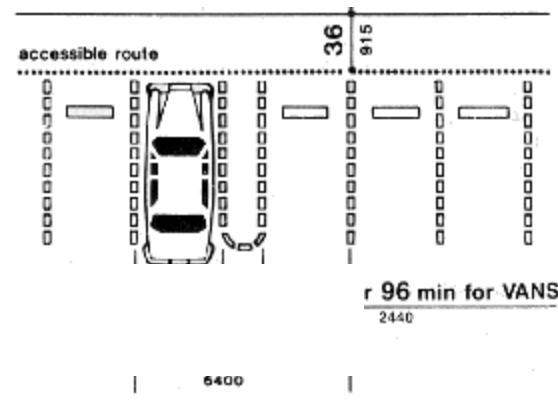


Figure 9
Dimensions of Parking Spaces

The access aisle shall be a minimum of 60 inches (1525 mm) wide for cars or a minimum of 96 inches (2440 mm) wide for vans. The accessible route connected to the access aisle at the front of the parking spaces shall be a minimum of 36 inches (915 mm).

ADAAG 4.6.4 Signage - Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign “Van-Accessible” mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.

Access Routes

ADAADS defines an accessible route as:

Accessible Route. This is a continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, *crosswalks at vehicular ways*, walks, ramps, and lifts. While not every route is required to be accessible, an accessible route must exist between elements used by students. Alternate routes are allowable when the route does not require students with disabilities to traverse greater distances or in unfavorable conditions. All non-accessible routes should be marked as such with directional signage to the nearest accessible route.

Non-Compliance: A review of the College’s walkways revealed that the walkways are not fully accessible to wheelchair students. Several ramps do not conform to accessibility standards. The ramps/walkways that do not meet accessibility standards are designated by number.

- Walkway (see photo 1) leads from an accessible crossing, between the East and West buildings, but has gaps and cracks that are 1" or more in diameter, plus uneven pavement with paved edges exceeding 1/4" vertically, making it difficult for wheelchair passage;
- Walkway (see photo 2) between the East and West buildings has gaps and cracks that are 1" or more in diameter, making it difficult for wheelchair passage.
- Ramp 1, which is front of the East building, but begins its incline at the bottom level of the East building, winds around in two parts, has a slope of over 10% in spots, on both parts, with a run in excess of 70 feet with handrails, and a rise well over 30 inches, but does not have a 60" x 60" landing every 30 feet, making this ramp inaccessible; thus it should be signed as inaccessible.
- Ramp 2, a ramp leading to the parking lot in front of the East building at the street level of the East building, has a slope of 9.3% in spots, with handrails, making this ramp inaccessible; thus it should be signed as inaccessible.
- Ramp 3, which extends from ramp 2, and leads directly to the parking lot, has a slope of 10% in certain places, without hand rails; making this ramp inaccessible; thus it should be signed as inaccessible.
- Ramp 4 that leads from the street up to the sidewalk in front of the West building, has a greater than 8.33% slope and has 1 to 4 inch cracks and holes wide and deep enough to hold water. (See Photo for West Building Outside Routes 1)

ADAAG 4.5.1* General. Ground and floor surfaces along accessible routes and in accessible rooms and spaces including floors, walks, ramps, stairs, and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.

ADAAG 4.5.2 Changes in Level. Changes in level up to 1/4 in (6 mm) may be vertical and without edge treatment (see [Fig. 7\(c\)](#)). Changes in level between 1/4 in and 1/2 in (6 mm and 13 mm) shall be beveled with a slope no greater than 1:2 (see [Fig. 7\(d\)](#)). Changes in level greater than 1/2 in (13 mm) shall be accomplished by means of a ramp that complies with [4.7](#) or [4.8](#).

ADAAG A4.5.1 General. People who have difficulty walking or maintaining balance or who use crutches, canes, or walkers, and those with restricted gaits are particularly sensitive to slipping and tripping hazards. For such people, a stable and regular surface is necessary for safe walking, particularly on stairs. Wheelchairs can be propelled most easily on surfaces that are hard, stable, and regular. Soft loose surfaces such as shag carpet, loose sand or gravel, wet clay, and irregular surfaces such as cobblestones can significantly impede wheelchair movement.

Required Action:

- 1). Since the College has accessible elevators in both the East and Allied Health buildings at the street level, it should install signage at ramps 1, 2, 3, and 4 to inform handicapped persons that the ramps are not ADA accessible. The signs should also have an arrow pointing in the direction of alternative accessible routes into the buildings.
- 2). The College should ensure that all walkways (see photos 1 and 2) especially those walkways along accessible routes to buildings, are fully accessible and passable for wheelchairs.
- 3). College should adjust the ramp in front of the West building (see photo 3), which leads from the street crosswalk up to the sidewalk, to a slope of no more than 8.33%.

Exterior Seating

No Evidence of Non Compliance: We did not detect any exceptions in this area, but will offer recommendations to make the campus more appealing to those with physical challenges. Picnic tables are provided in multiple locations inside and outside the building on the campus for student use. However, the tables do not have an accessible section, because the depth for leg clearance is less than 19”.

When seating is provided for students, comparable accessible seating can also be provided throughout for students with disabilities as well.

ADAAG 4.32.3 Knee Clearances - If seating for people in wheelchairs is provided at tables or counters, knee spaces at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided.

Recommendation:

SBCTC encourages the College to have a minimum of 1 or no less than 5% of the picnic/bistro tables in each campus area accessible to all students.

Accessible Programs (Classrooms/Labs/Shops)

Colleges may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities (including classrooms, labs, and shops) are inaccessible to or unusable by persons with disabilities.

East Building – (March 1983) 1977 ANSI Standards

Non-Compliance: A review of this facility revealed some areas of non-compliance.

1. The Dental Class, Room 102, has a notebook binder storage cabinet where each student has access to it. The students place their completed assignments in the cabinet for the instructors to access; conversely, after grading takes place, the instructors place the students' graded

assignments back in the cabinet. The students check their grades and place the binders back in the cabinets. Cabinets are labeled but need the height to be adjusted.

2. The storage room in the Dental Class, Room 102, has a route to it that is accessible to able-bodied students and has supply cabinets that are accessible to able-bodied students; but it is inaccessible to wheelchair students because the shelves are above accessible heights.

4. The Dental Class, Room 102, front office is regularly accessed by students for working, charts, and scheduling, and is handled by the students on a rotating basis in order to mirror what happens in a real-world situation. The clinic actually treats real patients so the students get actual experience in running a dental front office. The routes to move around in the office are not accessible to wheelchair, requiring 36" of passageway.

5. Dental Clinic, Room E104, has exposed pipes under the sinks.

6. Room E104 also has brochure racks with information for students that are inaccessible because of being placed too high.

7. Room E104 has shelving for items used for patient care that shelved too high to be accessible to wheelchair students.

8. The men's and lady's room/locker room in the Fitness Center (E115) has a coat hook which measures higher than the maximum height allowed.

9. The College bookstore has drinks and condiments placed at inaccessible heights.

10. Near the Fitness Center the Counseling and Community Resources wall has brochures that are placed too high to be accessible.

11. The College cafeteria has tables which students use to eat, but none of them are accessible to wheelchair persons because of the metal pieces that hang down underneath prohibiting knee and leg clearance.

12. The counters in the Chef City Grill (Room E147) are not accessible to wheelchair students. Both students and the public utilize this eatery.

13. Pipes under the sinks in the Culinary teaching area are not covered.

14. Paper towel dispensers in the Culinary teaching area are at 58"

15. The bakery preparation area has a foot activated hand washing sink.

16. Men's room E1990 has inaccessible urinal at 21"

17. The eyewash in room E156 robotics laboratory is not accessible at 42"; and as a result of our inspection of E156, we learned that all shops have the eyewash spouts at the same level of 42"

18. Small engine room E158, E133, and E136 have fixed tables that are inaccessible because of a bar under the table which obstructs wheelchair access.

19. In Building E, particularly the trades area, there is no ADA accessible restroom. The closest accessible restroom is near the cafeteria, which is quite a distance away.

20. In the paint and body trades shop the towel dispensers (torque wiper dispensers) are mounted at 60"

21. Room E142, in the Transportation Core, the tables are fixed and have obstructing metal pieces underneath that prohibit access by a wheelchair student due to the metal pieces blocking leg clearance.
- 22). The door pressure in restrooms E200 B and E200 D (Men's and Ladies) is too high for some handicap persons to open at 10 lbs.
- 23). Water fountains on 2nd floor of building E has water fountains that are inaccessible because they are structured in an alcove making it impossible for a wheelchair student to access them and the water is activated with the pushing down of the thumb.
- 24). Room E227 C has pencil sharpeners that are about inaccessible at 60" high.

1977 ANSI Standards

2.13 Appropriate Number. As used in this text, appropriate number means the number of a specific item that would be necessary, in accord with the purpose and function of a building or facility, to accommodate individuals with specific disabilities in proportion to the anticipated number of individuals with disabilities who would use a particular building or facility.

Example: Although these specifications shall apply to all buildings and facilities used by the public, the numerical need for a specific item would differ, for example, between a major transportation terminal, where many individuals with diverse disabilities would be continually coming and going, an office building or factory, where varying numbers of individuals with disabilities of varying manifestations (in many instances, very large numbers) might be employed or have reason for frequent visits, a school or church, where the number of individuals may be fixed and activities more definitive, and the many other buildings and facilities dedicated to specific functions and purposes.

3.3 The Adult Individual Functioning in a Wheelchair¹

3.3.1 The average unilateral vertical reach is 60 inches and ranges from 54 inches to 78 inches.

3.3.2 The average horizontal working (table) reach is 30.8 inches and ranges from 28.5 inches to 33.2 inches.

3.3.3 The bilateral horizontal reach, both arms extended to each side, shoulder high, ranges from 54 inches to 71 inches and averages 64.5 inches.

3.3.4 An individual reaching diagonally, as would be required in using a wall-mounted dial telephone or towel dispenser, would make the average reach (on the wall) 48 inches from the floor.

5.6.3 Toilet rooms shall have lavatories with narrow aprons, which when mounted at standard height are usable by individuals in wheelchairs; or shall have lavatories mounted higher, when particular designs demand, so that they are usable by individuals.

¹ Extremely small, large, strong, or weak and involved individuals could fall outside the ranges in 3.3.1, 3.3.2 3.3.3, and their reach could differ from the figure given in 3.3.4. However, these reaches were determined using a large number of individuals who were functionally trained, with a wide range in individual size and involvement.

Note: It is important that drain pipes and hot-water pipes under a lavatory be covered or insulated so that a wheelchair individual without sensation will not burn themselves.

5.6.5 Toilet rooms for men shall have wall-mounted urinals with the opening of the basin 19 inches from the floor, or shall have floor-mounted urinals that are on level with the main floor of the toilet room.

5.6 Toilet Rooms. It is essential that an appropriate number⁸ of toilet rooms, in accordance with the nature and use of a specific building or facility, be made accessible to and usable by, the physically handicapped.

5.6.6 Toilet rooms shall have an appropriate number⁸ of towel racks, towel dispensers, and other dispensers and disposal units mounted no higher than 40 inches from the floor.

5.7.2 Water fountains or coolers shall be hand-operated or hand-and foot-operated. (See also American Standard Specifications for Drinking Fountains, Z42.1942.)

Note 1: Conventional floor-mounted water coolers can be serviceable to individuals in wheelchairs if a small fountain is mounted on the side of the cooler 30 inches above the floor.

Note 2: Wall-mounted, hand-operated coolers of the latest design, manufactured by many companies can serve the able-bodied and the physically disabled equally well when the cooler is mounted with the basin 36 inches from the floor.

Note 3: Fully recessed water fountains are not recommended.

Note 4: Water fountains should not be set into an alcove unless the alcove is wider than a wheelchair. (See 3.1.)

Recommendation:

- 1). Re-arrange drinks and condiments in such a manner as to allow access to a handicapped person in a wheelchair. One manner is to place items vertically so that all items above 54 - 78" are available at levels below 54".
- 2). Ensure the route leading into the supply room is at least 36" wide for wheelchair passage, as ANSI Standards do not specifically address the width of a passageway.
- 3). Ensure at least one or a minimum of 2% of the tables are accessible to wheelchairs by having a 19" leg clearance, with 27" knee clearance.
- 4.) Counters in the Chef City Grill (Room 147) should be no more than 36 inches in height.
- 5). College needs to arrange brochure rack in such a manner as to allow access to handicapped person in a wheelchair. One manner is to place drinks vertically so that all drinks above 54-78" are available at levels below 54"
- 6). College needs to add another hook at an accessible height of less than 54" or drop the existing hook to less than 54"
- 7). When storage spaces are provided for students, 5% of the spaces should be available at an accessible height of no more than 54 – 78".
- 8). Tables in food preparation area and near room 148A should be positioned to allow at least 36" of width for passage of persons in a wheelchair
- 9). Adjust the door pressure in restrooms E200 B and E200 D (Men's and Ladies) down to no more than 5 lbs. of pressure required to open the door.

10). SBCTC recommends that the College provide an accessible restroom to handicapped students in the food preparation area to prevent handicapped students from having to travel long distances to the general population area to find an accessible restroom.

11). The recommendation is to provide at least one accessible worktable in rooms E158, E136, and E133 where there are fixed workstations.

12). At least 1 of the fixed work tables in Room E142, in the Transportation Core, should be accessible to wheelchair students.

Required Action:

1). Pipes under sinks in the Dental Department need to be covered in order to prevent injury.

2. Pipes under sinks in the food preparation areas need to be covered in order to prevent injury.

3. Men's room E1990 needs to lower urinal to no more than 17". Since the urinal is now at 21", but the standard for the 1982 East Building is the ANSI Standards, which call for 19" from the floor, the urinal has to be lowered. Since the lowering is taking place after 3/15/2012, during the time of the new 2010 standards are in place, the urinal has to be lowered to 17" to meet current standards.

4). Lower paper towel dispensers in Culinary dishwashing area to 54" or less. Since the dispenser is now above 40" from the floor (required by ANSI standards for 1982 building) and 54" (required by the 2010 ADA standards), the dispenser has to be lowered. Since the lowering is taking place after 3/15/2012, during the time of the new 2010 standards are in place, the paper towel dispenser has to be lowered to 54" rather than 40" in order to meet current standards.

5). The eyewash spouts in all the shops must be no more than 36" from the floor to allow for a wheelchair person to access.

6). In the paint and body trades shop the towel dispensers (torque wiper dispensers) need to be dropped down to no more than 54" from the floor.

7). The College must provide ADA accessible hand washing activation in at least 1 of the bakery preparation area sinks without twist and turn or foot controls. It is permissible to have foot controls as long as the foot controls are accompanied by some other ADA accessible activation control.

8). Water fountains on 2nd floor of building E must be the ADA accessible type that is not structured in an alcove making it impossible for a wheelchair student to access. The fountain must have an ADA activation method for persons with lack of strength in their hands.

Accessible Programs (Classrooms/Labs/Shops)

Colleges may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities (including classrooms, labs, and shops) are inaccessible to or unusable by persons with disabilities.

West Building – (March 1983) 1977 ANSI Standards

Non-Compliance: A review of this facility revealed some areas of non-compliance.

- 1). In the North end of building on the Evergreen Healthcare side of the building, the handicap button door opener is inoperable.
- 2). None of the picnic/bistro tables are wheelchair accessible.
- 3). W401 has an inaccessible stage in a classroom/conference hall. College is currently using a portable ramp should the need arise for wheelchair or otherwise mobility challenged person to access the stage.
- 4).The auditorium, which is room, W404 has 356 seats with only 4 that are accessible to wheelchairs.
- 5). Room 404B and 404D have push button accessible doors where the push buttons are not operating.
- 6). Currently there are no wheelchair accessible tables in room T413, computer lab.
- 7). Restroom W101, which is located in the West building, has pipes under the sinks that are not covered.
- 8). Room W210 D has a file cabinet in the middle of the walkway blocking wheelchair access.
- 9). In all Men's and Ladies restroom, at least one sink's pipes are not covered on all floors.
- 10). In the Student Services area, self service center, of the West Building, the documents are too high as they above the height of 48 -54"
- 11). In room W204A of the assessment room, the counter is 42" high. The counter is too high to be accessible.
- 12). Pencil sharpeners in classrooms are above 48 – 54 inches in reachable and accessible heights.

Recommendations:

- 1). In the north end of the building on the Evergreen Healthcare side of the building, the College should take action to ensure the handicap button door opener is inoperableoperational.
- 2). The College should attempt to ensure that a minimum of 5% or at least 1 of the picnic/bistro tables are wheelchair accessible.
- 3). W401 has an inaccessible stage in a classroom/conference hall. College is currently using a portable ramp should the need arise for wheelchair or otherwise mobility-challenged person to access the stage. College should consider adding a permanent ramp to make the stage accessible to avoid causing handicapped persons to be singled out in the event of needing to access the stage.
- 4).The auditorium, which is room, W404 has 356 seats with only 4 that are accessible to wheelchairs. College should include up to 25 additional accessible seats.

- 5). Room 404B and 404D have push button accessible doors; but the push buttons are not operating. College should fix those push buttons.
- 6). Room T413, computer lab, should have at least one table that is accessible for wheelchair access. Currently there are no wheelchair accessible tables in this room.

Required Action

- 1). The College must ensure that pipes under the sink in W101 restroom, in the West building, are covered.
- 2). In room W210 D the file cabinet in the middle of the walkway blocking wheelchair access must be removed.
- 3). In the West Building, in the men's and ladies restrooms, that are labeled accessible, the pipes under the sinks must be covered on all floors.
- 4). In the Student Services area, self service center, of the West Building, the College must place the documents at accessible heights of no more than 48 -54"
- 5). In room W204A, in the assessment room the College must adjust the counter to an accessible height of no more than 36" high.
- 6). The College must adjust all Pencil sharpeners in classrooms to an accessible height of no more than 48 – 54 inches.

Accessible Programs (Classrooms/Labs/Shops)

Colleges may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities (including classrooms, labs, and shops) are inaccessible to or unusable by persons with disabilities.

Portable Buildings (8 of them) (Constructed 19994) 1991 ADAAG Standards

Non-Compliance: A review of this facility revealed one area of non-compliance.

- 1). Building S2 does not have covered pipes in the handicap restroom.

4.19.4 (Sinks) Exposed Pipes and Surfaces. Hot water and drain pipes exposed under sinks shall be insulated or otherwise covered. There shall be no sharp or abrasive surfaces under sinks.

Required Action:

- 1). The College must ensure that all pipes under the sinks in the ADA accessible restrooms are covered.

Accessible Programs (Classrooms/Labs/Shops)

Colleges may not exclude students with disabilities from enjoying the benefits of its programs or services because its facilities (including classrooms, labs, and shops) are inaccessible to or unusable by persons with disabilities.

Tech Center Building (Constructed 2004) 1991 ADAAG Standards

Non-Compliance: A review of this facility revealed several areas of non-compliance.

- 1). All Kiosks on the 2nd and 3rd floors of the library are at inaccessible heights because the keyboard mounted under the surface of the kiosks limits knee clearance to 25 inches.
- 2). The ESL Testing center has tables with only 18 inches depth for leg clearance, making them inaccessible.
- 3). In room T220, there are no stations available where the keyboards are mounted at an accessible height above 34 inches for use by a student in a wheelchair.
- 4). In room T121, the door to the left side of the classroom is always congested making it difficult for persons with mobility challenges to enter the room.

4.32.3 Knee Clearances - If seating for people in wheelchairs is provided at tables or counters, knee spaces at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided.

4.25.2 Clear Floor Space- A clear floor space at least 30 in by 48 in (760 mm by 1220 mm) complying with [4.2.4](#) that allows either a forward or parallel approach by a person using a wheelchair shall be provided at accessible storage facilities

4.32.4 Height of Tables or Counters- The tops of accessible tables and counters shall be from 27 in to 34 in (710 mm to 865 mm) above the finish floor or ground.

Required Action:

- 1). The College must ensure that at least 1 table has knee clearance of 27 inches and leg clearance of 19 inches depth under the table for wheelchair access.
- 2). The College should take steps to ensure that in Room T121, the floor space for the door to the left side of the classroom is clear for safety and access for persons with mobility challenges.

Redmond Campus Building (Constructed 2011) 1991 ADAAG Standards

No Evidence of Non-Compliance: No violations were noted, but we did have at least one observation that we thought was worthy of a recommendation.

- 1). In rooms T116, T202 and T206, there are no tables that are fixed, but all are inaccessible.

Recommendation:

- 1). Classroom tables are not fixed, and the style of tables found in rooms T202 and T206 are found in classrooms throughout the campus; and since ADA regulations mandate that only fixed tables be accessible, SBCTC is recommending that the College ensure that at least 1 table in every classroom be accessible to wheelchair students.

Comparable Facilities

Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female or disabled students should be located in similar proximity to the associated classrooms, shops or laboratories.

No Evidence of Non-Compliance: Based upon our review of the College's facilities for accessibility, no violations noted.

Work Study Cooperative Education, Job Placement, and Apprentice Training

A college not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility not to foster discrimination by businesses that provide employment or workplace learning sites. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in such programs simply because of the sex, race, national origin, or disability of the student. It is also illegal to cooperate with an employer that requests students on the basis of sex, race, color, national origin or disability status. It is recommended that agencies have written agreements whereby the cooperating worksite indicates that they will not discriminate and that they understand the school or college will not work with any business that does. It is necessary to review these written agreements, the assignments of students presently in such programs and the placement process to see whether any such patterns exist.

No Evidence of Non-Compliance: Based upon a review of college demographics, documents, work study and apprenticeship agreements and interviews with staff and students, no violations were noted.

Title VI: 34 CFR 100.3 (b); Title IX: 34 CFR 106.31(d); Section 504: 34 CFR 104.4(b); Guidelines VII-A

Recommendation: We recommend the College include a statement on the Job Placement Bulletin Board which indicates that job postings are provided as a community service and have not been screened for non-discrimination by the employer.

Apprentice Training Program

In the same way that an employer may not discriminate and the educational agency may not work with any that do discriminate, it also has the responsibility to ensure that entities sponsoring apprenticeship programs such as unions do not discriminate. To be a partner in that discrimination is illegal. Assignments cannot be made or withheld in an apprenticeship program simply because of the sex, race, color, national origin, or disability of the student. A written agreement is recommended whereby the apprenticeship program indicates it will not discriminate on these bases. It is necessary to review apprenticeship assurance forms, the assignments of students presently in such programs and the placement process to see whether any such patterns exist.

No Evidence of Non-Compliance: Based upon a review of college demographics, documents including employer agreements and interviews with staff and students, no violations were noted.

Recommendation:

A review of demographics indicates no students with disabilities are participating in the apprenticeship program. The college should review the apprenticeship program to ensure its policies and procedures do not have the effect of discriminating against students with disabilities.

Employment

Recipients are prohibited from engaging in any employment practice that discriminates against any employee or applicant for employment on the basis of sex, disability, race, color, or national origin. Specific issues include employment policies, recruitment and selection matters, salary establishment and administration, reasonable accommodation, and overcoming the effects of past discrimination.

No Evidence of Non-Compliance: Based upon a review of college demographics, documents and interviews with staff and students, no violations were noted.

Recommendation:

We encourage the college to continue to recruit management and faculty from underrepresented groups when opportunities are available.

Photo #1



Photo #2



Photo #3





December 4, 2013

Ref.: 13-39-18

Dr. Amy Goings, President
Lake Washington Institute of Technology
11605 132nd NE Avenue
Kirkland, Washington 98034

RE: 2013 Civil Rights On-Site Review – Voluntary Correction Plan

Dear Dr. Goings:

Thank you for submitting the Voluntary Correction Plan (VCP) dated November 4, 2013 in response to the Civil Rights Review Letter of Findings (LOF) dated August 15, 2013. As of November 15, 2013, we believe the VCP addresses all the requirements of the LOF. In the event the Office for Civil Rights requires additional changes, we will notify the College of the required modifications.

We will continue to monitor the status of Lake Washington Institute of Technology's implementation of its VCP and will be in contact with the 'Person Responsible' at least four times per year until all corrective actions have been satisfactorily addressed. Verification of compliance may require additional site visits by State Board staff, which we will coordinate with the responsible person listed.

Please contact me at (360) 704-4389 or dbishop@sbctc.edu if you have any questions regarding these items. Again, we wish to thank you and your staff for your cooperation in this effort.

Sincerely,

David L. Bishop
Audit Coordinator
Finance Division

cc: Bill Thomas, Vice President, Administrative Services, LWIT
Greg Roberts, Executive Director of Human Resources, LWIT
Joann Wiszmann, Interim Accounting Services Director, SBCTC
Denise Graham, Deputy Executive Director, SBCTC
Steve Lewandowski, Chief Architect, SBCTC
Terri Colbert, CTC Program Specialist, WTECB

2012-2013 Civil Rights Review - Voluntary Compliance Plan Monitoring Lake Washington Institute of Technology

College:		Lake Washington Institute of Technology					
Contact:		Greg Roberts					
Last Date of Site Visit:		11/26/2012- 11/30/2012	LOF Date: 8/02/2013		VCP Date: 8/15/2013		Completion Date
	Last Monitoring Visit		VCP Acceptance Date:				
01 Administrative							
Compliance during visit?		No					
	Evidence of Non-Compliance	Resolution/Work Done	Person(s) Responsible	Target Date	Completion Date	Confirm Date	
1	<div style="border: 1px solid black; padding: 2px;">Continuous Notification</div> <p>Some documents such as brochures, flyers, applications, and publications used in recruitment or promotion of college programs do not contain a notice of non-discrimination statement; but in some cases the statement is present, by but buried deep into publications making it difficult to find. Currently, the catalog has the statement on page 236 out of 239 pages and the class schedule has it on page 48 out of 56 pages.</p> <p>Recommendation:</p>						

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	1). SBCTC recommends that the College make the non-discrimination statement easier to find (perhaps placing it closer to the beginning of the publication).	Non-discrimination statement was moved to page 6 and will also stay on page 239 of the 2013/2014 annual catalog.	Régine Adams Regine.adams@lwtech.edu (425) 739-8389	6/2013	6/2013	
		Non-discrimination statement was moved to page 3 of the Spring 2013 class schedule.	Régine Adams Regine.adams@lwtech.edu (425) 739-8389	3/2013	1/2013	
	Required Action 1). The College should establish and use a consistent non-discrimination statement that includes all protected groups to be used in all written communication used in promotion or recruitment. It is acceptable to place a sticker or an insert that contains the non-discrimination statement on documents when this statement has been inadvertently omitted. The information must also be available in alternate formats for individuals with impaired vision or hearing.	Non-discrimination statement was moved to page 6 and will also stay on page 239 of the 2013/2014 annual catalog.	Régine Adams Regine.adams@lwtech.edu (425) 739-8389	6/2013	6/2013	
		Non-discrimination statement was moved to page 3 of the Spring 2013 class schedule.	Régine Adams Regine.adams@lwtech.edu	3/2013	1/2013	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
		Formal non-discrimination statement standardized and published.	(425) 739-8389 Ruby Hayden Ruby.hayden@lwtech.edu	9/2013	9/2013	
		Webpages updated with formal non-discrimination statement.	(425) 739-8208 Greg Roberts Greg.roberts@lwtech.edu	9/2013	9/2013	
		Statement published and inserted into promotional materials.	(425) 739-8212 Ruby Hayden Ruby.hayden@lwtech.edu	9/2013	Ongoing	
		Student Services, Instructional Services, and Redmond campus staff notified.	(425) 739-8208 Ruby Hayden Ruby.hayden@lwtech.edu	9/2013	9/2013	
		Web content management system reviewed by college	Dave Neubert	1/2014		

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
		<p>and vendor. Website is accessible and meets requirements.</p> <p>The College utilized Ingeniux CMS for the website content software. The vendor claims the website developed with their software is fully compliant with Section 508 Policy for Electronic and Information Technology. The College is coordinating with the vendor to identify and rectify any deficiencies. This review is to be completed January 2014. The College's website front page provides a link to the Equal Opportunity statement. Disability Support Services information and policies may be found at the following link: http://www.lwtech.edu/student_services/disability_support_services.html</p> <p>Any questions or for assistance may be directed to Alma Osorio, Assistant Director – Student Development. Contact information is included on the DSS webpage.</p>	<p>Dave.neubert@lwtech.edu (425) 739-258</p>	<p>1/2014</p>		

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
2	<p>Title IX/Section 504/Title II Coordinators</p> <p>Each recipient shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Section 504, Title II, and Title IX.</p> <p>No Evidence of Non-Compliance Noted: The Title II, IX and Section 504 coordinator was identified on campus. Although discussions with the individual designated indicates a good understanding regarding the responsibilities for overseeing the college's compliance with federal Civil Rights laws, there are some concerns because students and employees must also feel comfortable with filing complaints against the coordinator. Also, if the person responsible for mitigating risks for the college is also the Title IX and section 504 coordinator, it could be a conflict in the duties of the risk manager verses one's responsibilities to pursue section 504 and Title IX issues that could adversely affect the College. It is not necessary for the coordinator to identify his/her personal name; as identification of the coordinator's title is sufficient. We also determined that the coordinator's job description sufficiently identified the aforementioned duties.</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>Recommendation:</p> <p>In order to avoid potential conflicts of interest, SBCTC recommends that personnel other than the Executive Director of Human Resources be appointed and trained as the section 504 and Title IX coordinator. It is sufficient, if the College chooses to do so, to have more than one person fulfilling the duties. If the College chooses to have more than one person, there must be sufficient oversight.</p> <p>Annual Public Notification</p> <p>The annual public notice must be issued with a brief summary of the College's admissions requirements and programs offered, prior to the beginning of the school year (before Fall Session). The issuance can be done in the local newspaper, the institution's newspaper, or other publications. It also must include the College's non-discrimination statement with title and contact information for the Sec 504 and Title IX coordinator(s).</p> <p>Non-Compliance:</p>	Executive Director of Human Resources is Section 504 and Title IX Coordinator; reports to the college president.	Greg Roberts Greg.roberts@lwtech.edu (425) 739-8212	9/2013	5/1997	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>Specifically, are there television or radio stations within the area that broadcast in a language other than English?</p> <p>Are there service groups that provide assistance directed to populations with limited English language skills within the service area?</p> <p>If the College can answer "yes" to one or more of these questions, then there is probably a community with limited English language skills and the College must also provide the annual notice in a language commensurate with its service area.</p>	<ul style="list-style-type: none"> • KXPA 1540 AM (Spanish Radio station) • Several agencies in King county offer ESL instruction (Center for MultiCultural Health, King County Library, Goodwill, HopeLink etc.) <p>Provide the notice in Spanish at minimum. The college has also translated the notice into Chinese, Korean, and Russian, as these languages are prevalent on campus and in the college's service area of King County.</p>	<p>Greg Roberts Greg.roberts@lwtech.edu (425) 739-8212</p>	10/2013	10/2013	
02	Site Location And Student Eligibility Criteria					
	Compliance during visit?	Yes				
	No Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirm Date
03	Recruitment					
	Compliance during visit?	Yes				
	No Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirm Date
	<p>Based on a review of recruitment teams, activities, materials and interviews with recruitment staff, no violations were noted because the percentages of representation for the College's</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	demographics for protected groups is higher than that of the 2010 Census.					
	<p>Required Action:</p> <p>The College should perform a study of the service area to determine if it contains a “community of national origin minority persons with limited English language skills”. Colleges should ask the following questions as guidelines in determining if such a community exists:</p> <ul style="list-style-type: none"> • Are non-English language communities being served by the media? • Specifically, are there television or radio stations within the area that broadcast in a language other than English? • Are there service groups that provide assistance directed to populations with limited English language skills within the service area? <p>If the College can answer "yes" to one or more of these questions, then there is probably a community with limited English language skills and should provide the</p>	<p>Annual notice published in Seattle Times.</p> <p>Non-English language media in the LWIT service district:</p> <ul style="list-style-type: none"> • El Siete Dias (Spanish newspaper in Bellevue) • KUNS 51: Univision (Spanish language TV station) • KFFV 45: Azteca America (Spanish language TV station) • KNTS 1680 AM (Spanish Radio station -- Seattle) • KXPA 1540 AM (Spanish Radio station) • Several agencies in King county offer ESL instruction (Center for MultiCultural Health, King County Library, Goodwill, HopeLink etc.) <p>Provide the notice in Spanish at minimum. The college has also translated the notice into</p>	<p>Greg Roberts Greg.roberts@lwtech.edu (425) 739-8212</p> <p>Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208</p> <p>Greg Roberts</p>	<p>9/2013</p> <p>9/2013</p> <p>10/2013</p>	<p>9/2013</p> <p>9/2013</p> <p>10/2013</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	annual notice in a language other than English	Chinese, Korean, and Russian, as these languages are prevalent on campus and in the college's service area of King County.	Greg.roberts@lwtech.edu (425) 739-8212			
04	Admissions					
	Compliance during visit?	Yes				
	No Evidence of Non-Compliance: Based on a review of student enrollment demographics, materials, and interviews with admissions staff, no violations were noted.					
05	Student Financial Aid					
	Compliance during visit?	Yes				
	No Evidence of Non-Compliance Noted: Based on a review of college financial documents, and interviews with financial aid staff and students, no violations were noted. Recommendation: After determining if there are national origin language communities in its service area, the College should develop additional financial aid materials in the languages of those national origin minority communities.	The Federal website for the financial aid application is already available in Spanish (the primary language identified above). http://www.fafsa.ed.gov/	Ruby Hayden Ruby.hayden@lwtech.edu (425) 8208	N/A	N/A	
06	Counseling and Prevocational Programs					
	Compliance during visit?	Yes				
	Counseling and prevocational programs may not steer students toward particular					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>courses or programs that are “traditional” for the student’s race, color, national origin, English language proficiency, sex, or disability status. Services and materials related to counseling and recruitment must be free of discrimination and stereotyping in language, content, and illustration.</p> <p>No Evidence of Non-Compliance: Based upon a review of college documents, counseling materials and activities and interviews with counseling staff and students, no violations were noted.</p>					
07	Services for Students with Disabilities					
	Compliance during visit?	Yes				
	<p>No Evidence of Non-Compliance: Based upon a review of college procedures, services provided and interviews with counseling staff and students, no violations were noted, but we did have some observations that we thought were worthy of recommendations.</p> <p>Recommendation: 1. Based on our interviews with disabled students using Disability Services, not only is Disability Services providing a wonderful service to disabled students, but the students are overwhelmingly pleased with the</p>	Fall 2013 In-Service training for faculty specifically addressed the concerns identified in points one and three.	Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208	9/2013	9/2013	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>accessibility and accommodations made for them in order to improve their educational experiences. However, several students with differing types of disabilities complained about a minority of instructors singling them out, expressing disdain for having to make accommodations, stressing them out about makeup exams and extra time, and even refusing to grant extra time for exams. Though it seems like only a minority of instructors are demonstrating a disdain for accommodations, SBCTC recommends the College to conduct, at least on an annual basis, disability sensitivity training for all faculty and staff.</p> <p>2. The College should strive to ensure note takers or scribes show up for class. If note takers or scribes do not show up, there should be an alternative plan in place to ensure students have someone to provide note taking assistance to the student in class.</p> <p>3. The College should ensure that for students who have been given modifications for testing, that instructors provide the proper time that students will be allowed to take their test, and that the grading is done timely so that students can know within a timely manner what their scores are.</p>	<p>In process: the DSS office will craft an all campus email about point one and three to send out on an annual basis.</p> <p>The DSS office updated the documentation given to scribes to specifically state the consequences of not showing up and included a requirement to notify the DSS office in advance if so; DSS can then provide a digital recorder to the student with a disability.</p> <p>Every quarter the DSS office will give the Director of Student Services a list of faculty who do not comply with DSS requirements for follow up with instructional deans.</p>	<p>Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208</p> <p>Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208</p> <p>Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208</p>	<p>12/2013</p> <p>10/2013</p> <p>9/2013</p>	<p>12/2013</p> <p>10/2013</p> <p>Ongoing</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
08	Accessibility					
	Compliance during visit?	No				
	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirm Date
A	Campus Wide					
1	<p>Campus Website</p> <p>No Evidence of Non-Compliance:</p> <p>Our review detected no reportable issues with the college's website due to lack of criteria at this time; but due to the Department of Justice's and the Office of Civil Rights increased emphasis on educational institutions' websites, SBCTC recommends that the College to make its website fully accessible to students with sensory impairments.</p> <p><u>Recommendation:</u> The College should make its website accessible to all persons; and can do so by following this helpful toolkit at www.ada.gov/pcatoolkit/chap5toolkit.htm. The College should also follow the technical assistance guidance provided at www.ada.gov/websites2.htm. In 2003, the Department of Justice issued a technical assistance document addressing website accessibility entitled, "Accessibility of State and Local Government Websites to People with</p>	Web content management system was reviewed by college and vendor. Website is accessible and meets requirements.	Dave Neubert Dave.neubert@lwtech.edu (425) 739-8258	10/2013	10/2013	

Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
<p><i>Disabilities.” This technical assistance document can be accessed on the ADA Home Page at www.ada.gov</i></p> <p>Parking: 1991 ADAAG Standards</p> <p>Americans with Disabilities Accessible Guidelines Standards (28 CFR 36) requires 2% of parking spaces to be handicap accessible with a minimum of one (1) per lot. Each parking lot is not required to have an accessible space if a nearby lot provides equal or greater accessibility. In addition, one in eight accessible spaces must be van accessible. Under the 2010 ADA Standards, which apply to any construction started as of March 15, 2012, for every six or fraction of six parking spaces required by 208.2 to comply with 502, at least one shall be a van parking space. During our review, we have determined that none of the Colleges parking lots were constructed after March 14, 2012, but this information about the 2010 ADA Standards is given as guidance because any alterations that will be made to existing parking lots in order to be in compliance with the requirements of this report, or for any other reason, after March 14, 2012, will automatically</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>invoke the 2010 ADA Standards for the entire parking lot.</p> <p>No Evidence of Non-Compliance:</p> <p>The information, pictures, and tables provided in the Letter of Findings are presented only for the purpose of assisting the College in understanding the ADA parking requirements for future reference.</p> <p>Access Routes</p> <p>Non-Compliance: A review of the College's walkways revealed that the walkways are not fully accessible to wheelchair students. Several ramps do not conform to accessibility standards. The ramps/walkways that do not meet accessibility standards are designated by number. Please see photos attached to the Letter of Findings (LOF).</p> <ul style="list-style-type: none"> • Walkway (see photo 1) leads from an accessible crossing, between the East and West buildings, but has gaps and cracks that are 1" or more in diameter, plus uneven pavement with paved edges exceeding 1/4" vertically, 					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>making it difficult for wheelchair passage;</p> <ul style="list-style-type: none"> • Walkway (see photo 2) between the East and West buildings has gaps and cracks that are 1" or more in diameter, making it difficult for wheelchair passage. • Ramp 1, which is front of the East building, but begins its incline at the bottom level of the East building, winds around in two parts, has a slope of over 10% in spots, on both parts, with a run in excess of 70 feet with handrails, and a rise well over 30 inches, but does not have a 60" x 60" landing every 30 feet, making this ramp inaccessible; thus it should be signed as inaccessible. • Ramp 2, a ramp leading to the parking lot in front of the East building at the street level of the East building, has a slope of 9.3% in spots, with handrails, making this ramp 					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>inaccessible; thus it should be signed as inaccessible.</p> <ul style="list-style-type: none"> Ramp 3, which extends from ramp 2, and leads directly to the parking lot, has a slope of 10% in certain places, without hand rails; making this ramp inaccessible; thus it should be signed as inaccessible. Ramp 4 that leads from the street up to the sidewalk in front of the West building, has a greater than 8.33% slope and has 1 to 4 inch cracks and holes wide and deep enough to hold water. (See Photo for West Building Outside Routes 1) <p>Required Action:</p> <p>1). Since the College has accessible elevators in both the East and Allied Health buildings at the street level, it should install signage at ramps 1, 2, 3, and 4 to inform handicapped persons that the ramps are not ADA accessible. The signs should also have an arrow pointing in the direction of alternative accessible routes into the buildings.</p>	<p>Signage ordered. Installation expected on 11/30/2013.</p> <p>All walkways where the concrete or asphalt was</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler</p>	<p>9/2013</p> <p>9/2013</p>	<p>Expected 11/2013</p> <p>9/2013</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>2).The College should ensure that all walkways (see photos 1 and 2) especially those walkways along accessible routes to buildings, are fully accessible and passable for wheelchairs.</p>	<p>identified to be uneven or damaged as illustrated in photo's 1 & 2 were patched in September 2013. See attached photo (#1 & #2).</p>	<p>Tim.wheeler@lwtech.edu (425) 739-8252</p>			
	<p>3). College should adjust the ramp in front of the West building (see photo 3), which leads from the street crosswalk up to the sidewalk, to a slope of no more than 8.33%.</p>	<p>The College has committed \$41,000 for ramp replacement and asphalt reconstruction project. This project is intended to enhance accessibility including addressing the ramp accessing the location in photo #3. This construction project is planned for the winter 2014, but may be delayed, depending on temperature & weather conditions.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	3/2014	Expected 3/2014	
	<p>Exterior Seating</p> <p>No Evidence of Non Compliance: We did not detect any exceptions in this area, but will offer recommendations to</p>	<p>The college will consider adding additional accessible tables in upcoming purchases.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu</p>	7/2014	Expected 07/2014	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>make the campus more appealing to those with physical challenges. Picnic tables are provided in multiple locations inside and outside the building on the campus for student use. However, the tables do not have an accessible section, because the depth for leg clearance is less than 19". When seating is provided for students, comparable accessible seating can also be provided throughout for students with disabilities as well.</p> <p>Recommendation: SBCTC encourages the College to have a minimum of 1 or no less than 5% of the picnic/bistro tables in each campus area accessible to all students. Even though ADA regulations do not require picnic/bistro tables that are not fixed to be handicap accessible; but it would be beneficial for the College to make the picnic/bistro tables accessible because it is advantageous to make the campus as accessible as possible in order to attract and provide a hospitable and welcoming environment to everyone.</p>		(425) 739-8252			
A	East Building – (March 1983) 1977 ANSI Standards					
	Accessible Programs (Classrooms/Labs/Shops)					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>Non-Compliance:</p> <p>1. The Dental Class, Room 102, has a notebook binder storage cabinet where each student has access to it. The students place their completed assignments in the cabinet for the instructors to access; conversely, after grading takes place, the instructors place the students' graded assignments back in the cabinet. The students check their grades and place the binders back in the cabinets. Cabinets are labeled but need the height to be adjusted.</p> <p>2. The storage room in the Dental Class, Room 102, has a route to it that is accessible to able-bodied students and has supply cabinets that are accessible to able-bodied students; but it is inaccessible to wheelchair students because the shelves are above accessible heights.</p> <p>4. The Dental Class, Room 102, front office is regularly accessed by students for working, charts, and scheduling, and is handled by the students on a rotating basis in order to mirror what happens in a real-world situation. The clinic actually treats real patients so the students get actual experience in running a dental front office. The routes to</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p><i>move around in the office are not accessible to wheelchair, requiring 36" of passageway.</i></p> <p><i>5. Dental Clinic, Room E104, has exposed pipes under the sinks.</i></p> <p><i>6. Room E104 also has brochure racks with information for students that are inaccessible because of being placed too high.</i></p> <p><i>7. Room E104 has shelving for items used for patient care that shelved too high to be accessible to wheelchair students.</i></p> <p><i>8. The men's and lady's room/locker room in the Fitness Center (E115) has a coat hook which measures higher than the maximum height allowed.</i></p> <p><i>9. The College bookstore has drinks and condiments placed at inaccessible heights.</i></p> <p><i>10. Near the Fitness Center the Counseling and Community Resources wall has brochures that are placed too high to be accessible.</i></p> <p><i>11. The College cafeteria has tables which students use to eat, but none of them are accessible to wheelchair persons because of the metal pieces</i></p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p><i>that hand down underneath prohibiting knew and leg clearance.</i></p> <p><i>12. The counters in the Chef City Grill (Room E147) are not accessible to wheelchair students. Both students and the public utilize this eatery.</i></p> <p><i>13. Pipes under the sinks in the Culinary teaching area are not covered.</i></p> <p><i>14. Paper towel dispensers in the Culinary teaching area are at 58"</i></p> <p><i>15. The bakery preparation area has a foot activated hand washing sink.</i></p> <p><i>16. Men's room E1990 has inaccessible urinal at 21"</i></p> <p><i>17. The eyewash in room E156 robotics laboratory is not accessible at 42"; and as a result of our inspection of E156, we learned that all shops have the eyewash spouts at the same level of 42"</i></p> <p><i>18. Small engine room E158, E133, and E136 have fixed tables that are inaccessible because of a bar under the table which obstructs wheelchair access.</i></p> <p><i>19. In Building E, particularly the trades area, there is no ADA</i></p>					

Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
<p><i>accessible restroom. The closest accessible restroom is near the cafeteria, which is quite a distance away.</i></p> <p><i>20. In the paint and body trades shop the towel dispensers (torque wiper dispensers) are mounted at 60"</i></p> <p><i>21. Room E142, in the Transportation Core, the tables are fixed and have obstructing metal pieces underneath that prohibit access by a wheelchair student due to the metal pieces blocking leg clearance.</i></p> <p><i>22). The door pressure in restrooms E200 B and E200 D (Men's and Ladies) is too high for some handicap persons to open at 10 lbs.</i></p> <p><i>23). Water fountains on 2nd floor of building E has water fountains that are inaccessible because they are structured in an alcove making it impossible for a wheelchair student to access them and the water is activated with the pushing down of the thumb.</i></p> <p><i>24). Room E227 C has pencil sharpeners that are about inaccessible at 60" high.</i></p> <p>Required Action:</p>	<p><i>Pipes have been covered.</i></p>		9/2013	9/2013	

Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
<p>1). Pipes under sinks in the Dental Department need to be covered in order to prevent injury.</p> <p>2. Pipes under sinks in the food preparation areas need to be covered in order to prevent injury.</p> <p>3. Men's room E1990 needs to lower urinal to no more than 17". Since the urinal is now at 21", but the standard for the 1982 East Building is the ANSI Standards, which call for 19" from the floor, the urinal has to be lowered. Since the lowering is taking place after 3/15/2012, during the time of the new 2010 standards are in place, the urinal has to be lowered to 17" to meet current standards.</p> <p>4). Lower paper towel dispensers in Culinary dishwashing area to</p>	<p>Pipes have been covered.</p> <p>Completed.</p> <p>Vendor identified 9/1/2013. Installation occurred 9/30/2013.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8212</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p> <p>Tim Wheeler</p>	<p>12/2013</p> <p>9/2013</p> <p>9/2013</p> <p>12/2013</p>	<p>9/2013</p> <p>9/2013</p> <p>9/2013</p> <p>9/2013</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>54" or less. Since the dispenser is now above 40" from the floor (required by ANSI standards for 1982 building) and 54" (required by the 2010 ADA standards), the dispenser has to be lowered. Since the lowering is taking place after 3/15/2012, during the time of the new 2010 standards are in place, the paper towel dispenser has to be lowered to 54" rather than 40" in order to meet current standards.</p> <p>5).The eyewash spouts in all the shops must be no more than 36" from the floor to allow for a wheelchair person to access.</p> <p>6). In the paint and body trades shop the towel dispensers (torque wiper dispensers) need to be dropped down to no more than 54" from the floor.</p>	<p><i>Shops inspected. In process of vendor selection to do work.</i></p> <p><i>Shops inspected and work completed.</i></p>	<p>Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	<p></p> <p>12/2013</p> <p>9/2013</p> <p>12/2013</p>	<p></p> <p>Expected 12/2013</p> <p>9/2013</p>	

Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
<p>7). The College must provide ADA accessible hand washing activation in at least 1 of the bakery preparation area sinks without twist and turn or foot controls. It is permissible to have foot controls as long as the foot controls are accompanied by some other ADA accessible activation control.</p> <p>8). Water fountains on 2nd floor of building E must be the ADA accessible type that is not structured in an alcove making it impossible for a wheelchair student to access. The fountain must have an ADA activation method for persons with lack of strength in their hands.</p> <p>Recommendation:</p> <p>1). Re-arrange drinks and condiments in such a manner as to allow access to a handicapped person in a wheelchair. One manner is to place items vertically so that all items above 54 - 78" are available at levels below 54".</p>	<p>Area inspected. In process of determining work to be done in-house or through vendor.</p> <p>Area inspected. In process of determining work to be done in-house or through vendor.</p> <p>The college will assess drinks and condiment location and accessibility at lower level.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p>	<p></p> <p>12/2013</p> <p>12/2013</p> <p>10/2013</p>	<p>Expected 12/2013</p> <p>Expected 12/2013</p> <p>Ongoing</p> <p>Ongoing</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>2). <i>Ensure the route leading into the supply room is at least 36" wide for wheelchair passage, as ANSI Standards do not specifically address the width of a passageway.</i></p> <p>3). <i>Ensure at least one or a minimum of 2% of the tables are accessible to wheelchairs by having a 19" leg clearance, with 27" knee clearance.</i></p> <p>4.) <i>Counters in the Chef City Grill (Room 147) should be no more than 36 inches in height.</i></p> <p>5). <i>College needs to arrange brochure rack in such a manner as to allow access to handicapped person in a wheelchair. One manner is to place items vertically so that all</i></p>	<p><i>College will assess access route and ensure passageway remains accessible.</i></p> <p><i>Complete: The college purchased and installed 5 accessible tables in September 2013.</i></p> <p><i>The college will consider this recommendation in future capital projects.</i></p> <p><i>The college will assess location and access at lower level.</i></p>	<p>Maria Macedo Maria.macedo@lwtech.edu (425) 739-8255</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu</p>	<p>9/2013</p> <p>6/2017</p> <p>12/2014</p>	<p>9/2013</p> <p>Expected 6/2017</p> <p>Ongoing</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p><i>above 54-78" are available at levels below 54"</i></p> <p>6). <i>College needs to add another hook at an accessible height of less than 54" or drop the existing hook to less than 54"</i></p> <p>7). <i>When storage spaces are provided for students, 5% of the spaces should be available at an accessible height of no more than 54 – 78".</i></p> <p>8). <i>Tables in food preparation area and near room 148A should be positioned to allow at least 36" of width for passage of persons in a wheelchair</i></p> <p>9). <i>Adjust the door pressure in restrooms E200 B and E200 D (Men's and Ladies) down to no more than 5 lbs. of pressure required to open the door.</i></p>	<p><i>College will install a hook as additional hooks are purchased.</i></p> <p><i>Sufficient storage space will be provided at lower levels.</i></p> <p><i>College will assess area and provide sufficient accessibility.</i></p> <p><i>College will measure and adjust door pressure of all doors periodically to ensure accessibility.</i></p>	<p>(425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu</p> <p>(425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu</p> <p>(425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu</p> <p>(425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu</p>	<p>12/2014</p> <p>10/2013</p> <p>12/2014</p> <p>9/2014</p>	<p>Expected 12/2014</p> <p>Ongoing</p> <p>Expected 12/2014</p> <p>Ongoing</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>10). SBCTC recommends that the College provide an accessible restroom to handicapped students in the food preparation area to prevent handicapped students from having to travel long distances to the general population area to find an accessible restroom.</p>	<p>The College will consider this recommendation in our planning for future capital projects. Unfortunately due to the delay in receiving our initial report, we have missed our opportunity to request funding as part of the 2013 facility condition assessment, which is the basis for our 2015-2017 capital request submittal.</p> <p>The college may consider utilization of limited RMI funding in the 2015-2017 biennium in relation to this recommendation.</p>	<p>(425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p>	<p>7/2017</p>	<p>Expected 7/2017</p>	
	<p>11). The recommendation is to provide at least one accessible worktable in rooms E158, E136, and E133 where there are fixed workstations.</p>	<p>As recommended, the College will consider adding additional accessible tables at these locations.</p> <p>Our goal in response to this particular recommendation is to provide a solution that will truly enhance accessibility for our students who are learning in these labs. The coordination of this holistic</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p>	<p>07/2014</p>	<p>Expected 07/2014</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	12). At least 1 of the fixed work tables in Room E142, in the Transportation Core, should be accessible to wheelchair students.	<p>approach will require discussion with Faculty, College Purchasing as well as identification and commitment of funding.</p> <p>As recommended, the College will consider adding additional accessible tables at these locations.</p> <p>Our goal in response to this particular recommendation is to provide a solution that will truly enhance accessibility for our students who are learning in these labs. The coordination of this holistic approach will require discussion with Faculty, College Purchasing as well as identification and commitment of funding.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	07/2014	Expected 07/2014	
B	West Building – (March 1983) 1977 ANSI Standards					
1	<p>Non-Compliance: A review of this facility revealed some areas of non-compliance.</p> <p>1). In the North end of building on the Evergreen Healthcare side of</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>the building, the handicap button door opener is inoperable.</p> <p>2). None of the picnic/bistro tables are wheelchair accessible.</p> <p>3). W401 has an inaccessible stage in a classroom/conference hall. College is currently using a portable ramp should the need arise for wheelchair or otherwise mobility challenged person to access the stage.</p> <p>4).The auditorium, which is room, W404 has 356 seats with only 4 that are accessible to wheelchairs.</p> <p>5). Room 404B and 404D have push button accessible doors where the push buttons are not operating.</p> <p>6). Currently there are no wheelchair accessible tables in room T413, computer lab.</p> <p>7). Restroom W101, which is located in the West building, has pipes under the sinks that are not covered.</p> <p>8). Room W210 D has a file cabinet in the middle of the walkway blocking wheelchair access.</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>9). In all Men's and Ladies restroom, at least one sink's pipes are not covered on all floors.</p> <p>10). In the Student Services area, self service center, of the West Building, the documents are too high as they above the height of 48 -54"</p> <p>11). In room W204A of the assessment room, the counter is 42" high. The counter is too high to be accessible.</p> <p>12). Pencil sharpeners in classrooms are above 48 – 54 inches in reachable and accessible heights.</p> <p>Required Action: The College has a readily available service counter window at the appropriate 36" accessible height; but the College needs to open the available service counter window for the benefit of and to provide equal services to the 174 physically challenged students on campus, especially those in wheelchairs.</p> <p>2. Door pressure for all doors was detected at 10 pounds of pressure.</p>	<p>Completed: the Cashier's Office window, and the Registration Office window, that accommodates customers with disabilities, are and will stay open.</p> <p>Service request submitted. New testing equipment needed, adjustment planned for 12/2013.</p>	<p>Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8389</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	<p>9/2013</p> <p>12/2013</p>	<p>9/2013</p> <p>Expected 12/2013</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	3. Pipes under sinks in the Art Department are exposed.	Pipes have been covered.	Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252	9/2013	9/2013	
	4. There is debris under the sinks in the Art Department making it impossible for wheelchair leg and knee access.	Service request submitted. Service completed 9/27/2013.	Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252	9/2013	9/2013	
	Required Action: 1). The College must ensure that pipes under the sink in W101 restroom, in the West building, are covered.	Service request submitted. Coverage of pipes completed 9/27/2013.	Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252	9/2013	9/2013	
	2). In room W210 D the file cabinet in the middle of the walkway blocking wheelchair access must be removed.	Completed.	Tim Wheeler Tim.wheeler@lwtech.edu u	9/2013	9/2013	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	3). In the West Building, in the men's and ladies restrooms, that are labeled accessible, the pipes under the sinks must be covered on all floors.	Service request submitted. Coverage of pipes completed 9/30/2013.	(425) 739-8252 Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252	9/2013	9/2013	
	4). In the Student Services area, self service center, of the West Building, the College must place the documents at accessible heights of no more than 48 -54"	Completed. The department will review areas every quarter to ensure compliance.	Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208	9/2013	9/2013	
	5). In room W204A, in the assessment room the College must adjust the counter to an accessible height of no more than 36" high.	Completed; counter modified in September. The new counter was modified with a lower section at a height of 34", See attached photo (W204 counter height modifications)	Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252	9/2013	9/2013	
	6). The College must adjust all Pencil sharpeners in classrooms to an	Service request submitted 8/2013. Height adjustments completed 9/15/2013.	Tim Wheeler	9/2013	9/2013	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>accessible height of no more than 48 – 54 inches.</p> <p>Recommendation:</p> <p>1). In the north end of the building on the Evergreen Healthcare side of the building, the College should take action to ensure the handicap button door opener is operable.</p> <p>2). The College should attempt to ensure that a minimum of 5% or at least 1 of the picnic/bistro tables are wheelchair accessible.</p>	<p>College will assess and adjust all door openers periodically to ensure operation.</p> <p>As recommended, the College will consider adding additional accessible picnic/bistro tables at these locations. Our goal in response to this particular recommendation is to provide a solution that will truly enhance accessibility for our students who are eating at and using these tables. The coordination of this holistic approach will require discussion with Faculty, College Purchasing as well as</p>	<p>Tim.wheeler@lwtech.edu u (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu u (425) 739-8252</p>	<p>12/2014</p> <p>07/2014</p>	<p>Ongoing</p> <p>Expected 07/2014</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>3). W401 has an inaccessible stage in a classroom/conference hall. College is currently using a portable ramp should the need arise for wheelchair or otherwise mobility-challenged person to access the stage. College should consider adding a permanent ramp to make the stage accessible to avoid causing handicapped persons to be singled out in the event of needing to access the stage.</p> <p>4). The auditorium, which is room, W404 has 356 seats with only 4 that are accessible to wheelchairs. College should include up to 25 additional accessible seats.</p>	<p>identification and commitment of funding.</p> <p>The College will consider this recommendation in our planning for future capital projects. We will need to make a decision as to whether to demolish and remove the stage altogether or install a ramp. We may consider utilization of limited RMI funding in the 2015-2017 biennium in relation to this recommendation.</p> <p>The College will consider this recommendation in our planning for future capital projects. We will need to make a decision as to whether to demolish and remove the stage altogether or install a ramp for accessibility. We may consider utilization of limited RMI funding in the 2015-2017 biennium in relation to this recommendation.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	<p>07/2017</p> <p>07/2017</p>	<p>Expected 07/2017</p> <p>Expected 07/2017</p>	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	5). Room 404B and 404D have push button accessible doors; but the push buttons are not operating. College should fix those push buttons.	College will assess and adjust all door openers periodically to ensure operation.	Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252	12/2014	Ongoing	
	6). Room T413, computer lab, should have at least one table that is accessible for wheelchair access. Currently there are no wheelchair accessible tables in this room.	As recommended, the College will consider adding additional accessible tables at these locations. Our goal in response to this particular recommendation is to provide a solution that will truly enhance accessibility for our students who are learning in these labs. The coordination of this holistic approach will require discussion with Faculty, College Purchasing as well as identification and commitment of funding.	Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252	07/2014	Expected 07/2014	
C	Portable Buildings (8 of them) (Constructed 19994) 1991 ADAAG Standards					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
1	<p>Non-Compliance: A review of this facility revealed some areas of non-compliance.</p> <p>1). Building S2 does not have covered pipes in the handicap restroom.</p> <p>Required Action:</p> <p>1). The College must ensure that all pipes under the sinks in the ADA accessible restrooms are covered.</p>	<p>Service request submitted. Coverage of pipes completed 9/15/2013.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	9/2013	9/2013	
D	Tech Center Building (Constructed 2004) 1991 ADAAG Standards					
	<p>Non-Compliance: A review of this facility revealed several areas of non-compliance.</p> <p>1). All Kiosks on the 2nd and 3rd floors of the library are at inaccessible heights because the keyboard mounted under the surface of the kiosks limits knee clearance to 25 inches.</p> <p>2). The ESL Testing center has tables with only 18 inches depth for leg clearance, making them inaccessible.</p> <p>3). In room T220, there are no stations available where the keyboards are mounted at an accessible height above 34</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>inches for use by a student in a wheelchair.</p> <p>4). In room T121, the door to the left side of the classroom is always congested making it difficult for persons with mobility challenges to enter the room.</p> <p>Required Action:</p> <p>1). The College must ensure that at least 1 table has knee clearance of 27 inches and leg clearance of 19 inches depth under the table for wheelchair access.</p> <p>2). The College should take steps to ensure that in Room T121, the floor space for the door to the left side of the classroom is clear for safety and access for persons with mobility challenges</p>	<p>The college will purchase a new table to address this issue. Completion of service planned for 12/30/2013.</p> <p>Removed instructional storage from this location and informed faculty not to store items there.</p>	<p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p> <p>Tim Wheeler Tim.wheeler@lwtech.edu (425) 739-8252</p>	<p>12/2013</p> <p>9/2013</p>	<p>Expected 12/2013</p> <p>9/2013</p>	
E	Redmond Campus Building (Constructed 2011) 1991 ADAAG Standards					
	No Evidence of Non-Compliance:					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>No violations were noted, but we did have at least one observation that we thought was worthy of a recommendation.</p> <p>1). In rooms T116, T202 and T206, there are no tables that are fixed, but all are inaccessible.</p> <p>Recommendation:</p> <p>1). Classroom tables are not fixed, and the style of tables found in rooms T202 and T206 are found in classrooms throughout the campus; and since ADA regulations mandate that only fixed tables be accessible, SBCTC is recommending that the College ensure that at least 1 table in every classroom be accessible to wheelchair students.</p>	The college will consider adding additional accessible tables in upcoming purchases.	<p>Tim Wheeler</p> <p>Tim.wheeler@lwtech.edu</p> <p>(425) 739-8252</p>	12/2014	Expected 12/2014	
F	Comparable Facilities					
1	<p>Separate facilities for students with disabilities should be similar in quality and convenience to facilities for students without disabilities. Separate changing rooms, showers and other facilities for students of one sex should be similar in quality and convenience to the facilities for students of the other sex. Any separate facilities for male, female or disabled students should be located in</p>					

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	<p>similar proximity to the associated classrooms, shops or laboratories.</p> <p>No Evidence of Non-Compliance: Based upon our review of the College's facilities for accessibility, no violations noted.</p>					
G	Work Study Cooperative Education, Job Placement, and Apprentice Training					
1	<p>No Evidence of Non-Compliance: Based upon a review of college demographics, documents, work study and apprenticeship agreements and interviews with staff and students, no violations were noted.</p> <p>Recommendation: We recommend the College include a statement on the Job Placement Bulletin Board which indicates that job postings are provided as a community service and have not been screened for non-discrimination by the employer.</p>	The recommended statement has been posted.	<p>Ruby Hayden Ruby.hayden@lwtech.edu (425) 739-8208</p>	10/2013	10/2013	
H	Apprentice Training Program					
	<p>No Evidence of Non-Compliance: Based upon a review of college demographics, documents including employer agreements and interviews with staff and students, no violations were noted.</p> <p>Recommendation: A review of demographics indicates no students with</p>		<p>Sharon Buck</p>	12/2013	Expected 2013	

	Evidence of Non-Compliance	Resolution	Person(s) Responsible	Target Date	Completion Date	Confirmed Date
	disabilities are participating in the apprenticeship program. The college should review the apprenticeship program to ensure its policies and procedures do not have the effect of discriminating against students with disabilities.	The College will review apprenticeship policies and procedures.	Sharon.buck@lwtech.edu (425) 739-8146			
I	Employment					
	<p>No Evidence of Non-Compliance: Based upon a review of college demographics, documents and interviews with staff and students, no violations were noted.</p> <p>Recommendation: We encourage the college to continue to recruit management and faculty from underrepresented groups when opportunities are available.</p>	The college will continue its efforts to recruit from diverse and underrepresented populations, including joining the Greater Washington Higher Education Consortium 10/2013 to increase outreach to people of color and diversity, and participating in the Washington State Community & Technical College Diversity Job Fair on 11/16/2013.	Greg Roberts Greg.roberts@lwtech.edu (425) 739-8212	Ongoing	Ongoing	