



METHODS OF ADMINISTRATION STATE PLAN

**BOARD OF REGENTS OF HIGHER EDUCATION
OFFICE OF THE COMMISSIONER OF HIGHER EDUCATION
MONTANA UNIVERSITY SYSTEM
&
MONTANA OFFICE OF PUBLIC INSTRUCTION**

2020

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PREFACE

The United States Department of Education Office for Civil Rights gives the Montana Board of Regents, as Montana's eligible agency responsible for the administration of federal funds received through the Strengthening Career and Technical Education for the 21st Century Act of 2018 (Perkins V), the responsibility for monitoring civil rights compliance of all recipients and subrecipients of Perkins funds for career & technical education (CTE) programs. The reviews permit the Board, through its central administrative unit, the Office of the Commissioner of Higher Education (OCHE), to identify, prevent, and remedy discrimination on the basis of race, color, national origin, sex, or disability in CTE programs and ensure equal access to CTE opportunities for all Montana students. OCHE, along with its partner agency The Office of Public Instruction (OPI), provide technical assistance to help institutions achieve voluntary compliance with the federal nondiscrimination regulations.

This revision of the previously revised Methods of Administration for the Implementation of the Civil Rights Guidelines (1988) reflects changes in guidance and an updated Memorandum of Procedures for state agencies responsible for methods of administration civil rights monitoring issued by the United States Department of Education Office for Civil Rights and Office of Career, Technical, and Adult Education via a Program Memorandum on February 6, 2020.

MOA State Plan history:

2020: Revised to reflect guidance from the Memorandum dated February 6, 2020

1988: Revised to reflect change in sole agency status to the Montana Board of Regents

1986: Revised

1982: Approved

Federal Compliance Requirements:

- Title VI of the Civil Rights Act of 1964, and its implementing regulation at 34 C.F.R. Part 100 (Title VI), which prohibit discrimination on the basis of race, color, and national origin by recipients of federal financial assistance.
- Title IX of the Education Amendments of 1972, and its implementing regulation at 34 C.F.R. Part 106 (Title IX), which prohibit discrimination on the basis of sex in any educational program or activity receiving federal financial assistance.
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulation of 34 C.F.R. Part 104 (Section 504), which prohibit discrimination on the basis of disability by recipients of federal financial assistance.
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulation at 28 C.F.R. Part 35 (Title II), which prohibit discrimination on the basis of disability by public entities.

- Guidelines for Elimination Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs, 34 C.F.R. Part 100, Appendix B (Guidelines).

All schools receiving federal funds are required to comply with federal nondiscrimination laws. The United States Department of Education Office for Civil Rights monitors this compliance requirement.

I. INTRODUCTION

This section describes the process used to develop, review, and approve Montana's Methods of Administration (MOA). The purpose of the MOA is to establish uniform procedures to identify, prevent, and remedy discrimination on the basis of race, color, national origin, sex, or disability in career and technical education (CTE) programs and ensure that all students have equal access to high-quality CTE opportunities. These procedures apply to all subrecipients delivering CTE services.

A. Development of the Methods of Administration (MOA)

1. Identification of Responsible Agencies

- i. The Montana Board of Regents (BOR) is Montana's eligible state agency for the Strengthening Career and Technical Education for the 21st Century Act of 2018 (Perkins V). With eligible state agency status goes the responsibility for monitoring civil rights compliance of all recipients of federal funds from the Department of Education in support of CTE. The BOR's central administrative unit is the Office of the Commissioner of Higher Education (OCHE). The OCHE MOA Coordinator and CTE team partnered with OPI for the development of the MOA State Plan.
- ii. In accordance with Montana Code Annotated 20-7-329, The Montana Board of Regents and OCHE contract with the superintendent of public instruction for the administration and supervision of activities allowed by the Strengthening Career and Technical Education for the 21st Century Act of 2018 (Perkins V). The Montana Office of Public Instruction (OPI) has the responsibility to develop the procedures for the administration and monitoring of secondary subrecipients, as described in *Section II-B* of the MOA State Plan and shares responsibility with OCHE for developing other parts of the MOA State Plan that involve secondary subrecipients.

2. Development and Review of the MOA

- i. The OCHE MOA Coordinator and CTE team developed the MOA State Plan in coordination with the OPI.
 - OCHE collaborated with OPI and provided leadership in the development of the MOA State Plan and developed the parts of the MOA State Plan that involve postsecondary subrecipients.
 - The OPI MOA Coordinator and MOA team developed the parts of the MOA State Plan that involve secondary subrecipients.
 - Leadership from both OCHE and the OPI reviewed and provided feedback on the complete MOA State Plan.
- ii. Personnel at OCHE who reviewed and provided feedback on the MOA State Plan include:
 - Deputy Commissioner of Academic, Research & Student Affairs
 - Montana University System Compliance Officer
 - State CTE Director
 - Commissioner of Higher Education
- iii. Personnel at the OPI who reviewed and provided feedback on the MOA State Plan include:
 - Agriculture Education Specialist
 - Business Education Specialist
 - Family & Consumer Sciences Education Specialist
 - Health Science Education Specialist
 - Industrial Technology Education Specialist
 - State Special Education Coordinator
 - Health Enhancement and Safety Division Administrator
 - School Improvement Every Student Succeeds Act Coordinator
 - School Nutrition Assistant Program Director
 - Superintendent of Public Instruction

3. Approval of the MOA

- i. Final review of the MOA and approval of the document for submission included the following:
 - Commissioner of Higher Education
 - State CTE Director

- Superintendent of Public Instruction
- CTAE Unit Manager

II. COMPLIANCE PROGRAM

This section describes Montana’s MOA Compliance Program to prevent, identify, and remedy discrimination based on race, color, national origin, sex, or disability in CTE programs of subrecipients. The MOA Compliance Program includes procedures for collecting and analyzing civil rights data, conducting periodic compliance reviews, notifying subrecipients of noncompliance, and addressing voluntary corrective actions.

A. Statement of Objectives

The objectives of the MOA Compliance Program are:

- To collect and analyze data for CTE programs and services of all secondary and postsecondary subrecipients to identify those subrecipients that may need assistance in achieving equal access to CTE opportunities in Montana.
- To conduct periodic compliance reviews of selected subrecipients offering CTE programs to determine if any unlawful discrimination exists.
- To provide technical assistance to prevent and eliminate discriminatory practices of subrecipients.
- To obtain voluntary compliance, where possible, of any subrecipient found to have its CTE programs and services in noncompliance with civil rights laws.

B. Organizations and Personnel Responsible for the MOA Compliance Program

1. Administration

The MOA Coordinator in the Career & Technical Education team inside the Academic, Research & Student Affairs department at OCHE has the responsibility for monitoring the administration of the MOA Compliance Program for all eligible subrecipients in Montana. Responsibilities include working with personnel at OCHE and the OPI to develop and review policies and procedures and carry out all aspects data collection and analysis, civil rights compliance reviews, technical assistance, and biennial reporting.

2. Postsecondary

Led by the MOA Coordinator, OCHE has the responsibility to implement the MOA Compliance Program for postsecondary subrecipients, including the collection and analysis of civil-rights data and the implementation and development of civil rights compliance reviews and technical assistance activities and resources.

3. Secondary

The OPI has the responsibility to implement the MOA Compliance Program for secondary subrecipients, including the collection and analysis of civil-rights data and the implementation and development of civil rights compliance reviews and technical assistance activities and resources.

C. Postsecondary Compliance Program

1. Data Collection & Analysis

- i. OCHE will collect civil rights-related data annually from all postsecondary subrecipients.
 - The OCHE MOA Coordinator and CTE team will collect civil rights-related data from postsecondary subrecipients in the Montana University System (MUS) through its central database.
 - The OCHE MOA Coordinator will request delivery of civil rights-related data, as part of the data set collected for Perkins V, from postsecondary subrecipients (such as tribal schools) that do not store data in the MUS central database.
- ii. The postsecondary subrecipients' civil rights-related data collected by OCHE will include:
 - Enrollment
 - Sex
 - Race
 - Disability
 - Last compliance review

2. Selection of Subrecipients for Desk Audit Compliance Reviews

- i. OCHE will select at least two postsecondary subrecipients each year for remote or desk audit compliance reviews of all issue areas.
- ii. OCHE will use the following selection criteria to develop a ranked list of postsecondary subrecipients to select for desk audit compliance reviews each year:
 - Date of last compliance review
 - Total enrollment
 - Total male enrollment vs. % of males in CTE programs
 - Total female enrollment vs. % of females in CTE programs
 - Total disability enrollment vs. % of disability in CTE programs
 - Total enrollment by race vs. % of race in CTE programs

3. Notifying Subrecipients of Desk Audit Compliance Reviews

- i. OCHE will notify via e-mail all postsecondary subrecipients selected to receive desk audit compliance reviews at least thirty (30) days prior to the date of the review. The notification will include:
 - An explanation of the reason and authority for the desk audit
 - A description of the process of the desk audit
 - A timeframe for the compliance review
 - A request for additional information, if necessary
 - An indication of how the subrecipient will receive results of the desk audit
 - The name(s) of the personnel in charge of the desk audit

4. Conducting Desk Audit Compliance Reviews

- i. Staff from OCHE will review all issue areas of postsecondary subrecipients selected for desk audit compliance reviews.
- ii. The desk audit will include examination of websites, policies, publications, and other civil rights-related pictures and documents covering subrecipients' issue areas.
- iii. For issue areas that require further information, OCHE may conduct interviews of subrecipients' students and staff via remote technology.

- iv. Subrecipients will complete a checklist for each desk audit, specifying minimum standards for compliance in each issue area. OCHE will review the checklist and will note any policies, procedures, or activities that do not meet the criteria of compliance on the checklist. This information will be included in the desk audit review findings.

5. Notification of Desk Audit Compliance Review Findings

Postsecondary subrecipients selected for desk audit compliance reviews will receive via e-mail a Letter of Findings (LOF) within thirty (30) days of completion of the desk audit. The LOF will include the results of the desk audit and notify subrecipients of whether further review is necessary by indicating one of the following:

- i. The desk audit did not find any areas of noncompliance. There will not be an on-site compliance review for the subrecipient, but the subrecipient must continue to comply with all civil rights requirements.
- ii. The desk audit did not find any areas of noncompliance, but OCHE will conduct an on-site compliance review of the subrecipient. Although the desk audit did not reveal any areas of noncompliance, OCHE may choose to do an on-site review for the following reasons:
 - Incomplete, or unable to complete, desk audit
 - New to Perkins V
 - New or altered construction
 - New or altered CTE programs
 - Change in leadership or civil rights personnel
 - Several years since last on-site review
 - Technical assistance opportunities
 - To align with Perkins V monitoring
 - To provide better monitoring and compliance assistance
- iii. The desk audit found minimal areas of possible noncompliance. There will not be an on-site compliance review for the subrecipient, but the subrecipient must take corrective actions through a Voluntary Compliance Plan (VCP), (See *Section II-C-8*).
- iv. The desk audit found possible civil rights violations. OCHE will schedule and conduct an on-site compliance review and issue a new LOF after the completion of the review. Upon completion of the on-site review, the subrecipient may need to take corrective actions through a VCP. (See *Section II-C-8*).

6. Conducting On-Site Compliance Reviews

- i. Staff from OCHE will perform an on-site compliance review of postsecondary subrecipients based on the results of the desk audit compliance review.
- ii. The on-site review will include examination of all issue areas.
- iii. The on-site review will include interviews of subrecipients' students and staff and examination of physical facilities in addition to the materials examined as part of the desk audit.
- iv. The on-site review will focus first on items included in the desk audit to verify the desk audit findings and then focus on other items to include all issue areas.
- v. Subrecipients will complete a checklist for each on-site review, specifying minimum standards for compliance in each issue area. OCHE will review the checklist and will note any policies, procedures, or activities that do not meet the criteria of compliance on the checklist. This information will be included in the on-site review findings.

7. Notification of On-Site Compliance Review Findings

Postsecondary subrecipients selected for on-site compliance reviews will receive via e-mail a LOF within thirty (30) days of completion of the on-site review. The LOF will include the results of the desk audit and on-site review and notify subrecipients of any necessary further action by indicating one of the following:

- i. The review did not find any areas of noncompliance, but the subrecipient must continue to comply with all civil rights requirements.
- ii. The review found civil rights violations. OCHE will schedule and conduct an on-site compliance review and issue a new LOF after the completion of the review. Upon completion of the on-site review, the subrecipient may need to take corrective actions through a VCP. (See *Section II-C-8*).

8. Voluntary Corrective Actions

OCHE requires postsecondary subrecipients found to be in noncompliance to take steps to remedy issues and gain compliance with nondiscrimination laws. As part of the MOA Compliance Program, OCHE will provide technical assistance to subrecipients to facilitate compliance. If civil rights violations are minor,

subrecipients may describe the corrective action in correspondence and include photographic evidence, as necessary. If civil rights violations are extensive, subrecipients must provide a Voluntary Compliance Plan (VCP).

i. Components of the VCP

VCPs should contain the following components:

- Compliance issue(s)
- Activities or tasks to remedy issue(s)
- Planned initiation date
- Planned completion date
- Person(s) responsible
- Needed resources
- Needed technical assistance
- Date for reporting compliance to OCHE

ii. Timeframe for the VCP

- Subrecipients found to be in noncompliance must prepare and submit correspondence or a VCP to OCHE within ninety (90) days of receipt of the LOF from OCHE.

iii. Monitoring Process

OCHE will monitor VCPs of subrecipients through the following process:

- Review actions identified and described by subrecipients in their VCPs
- Request any appropriate documentation (including photographic evidence) to assist in monitoring the VCP for compliance
- Verify, either remotely or through a follow-up visit, to ensure implementation of corrective actions in subrecipients' VCPs
- Provide correspondence to subrecipients evaluating whether the implementation of the VCP sufficiently remedies finding of noncompliance

iv. Notification to Office of Civil Rights

OCHE will report to the Office of Civil Rights (OCR) findings for postsecondary subrecipients that fail to take corrective action to remedy issues of noncompliance found during compliance reviews. The reports

will include documentation indicating the extent and efforts made to assist subrecipients to take corrective actions. OCHE will submit the reports to OCR within thirty (30) calendar days after determining that voluntary compliance cannot be achieved.

9. Notifying Subrecipients of the Conclusion of Compliance Reviews

OCHE will notify postsecondary subrecipients of the conclusion of each compliance review within thirty (30) days of the last LOF, last evaluation of VCP, or report of noncompliance to OCR, whichever comes later.

10. Timeline of Postsecondary Compliance Program

The approximate timeline of the Postsecondary Compliance Program will be as follows:

- August – September: Data collection and analysis and selection of subrecipients for desk audit compliance reviews
- October: Notification of selection for desk audit
- November – January: Desk audit compliance review, including compilation of necessary documentation
- February: Notification of desk audit findings and notification and scheduling of on-site compliance review (if required)
- March – April: On-site compliance review (if required)
- May: Formal notice of on-site compliance review findings
- June – July: Notification and completion of VCPs

D. Secondary Compliance Program

1. Data Collection & Analysis

The OPI will collect civil rights-related data on a biennial basis from all secondary subrecipients.

- i. The OPI will collect and analyze civil rights-related data through a variety of platforms and mediums. Secondary education subrecipients provide data to The OPI through:
 - Terms of Employment, Accreditation and Master Schedule (TEAMS)
 - Achievement in Montana (AIM)

- ii. The secondary subrecipients' civil rights-related data collected by the OPI will include:
 - Time since last visit
 - Number of CTE Programs
 - Enrollment by sex
 - Enrollment by disability
 - Enrollment by race
 - Geographic location
 - Past and scheduled Perkins V monitoring
- iii. The OPI will use the data collected to determine a subrecipient universe.
 - Subrecipients will be broken out by individual school, **not** the school's local education agency or district.
 - Each subrecipient in Montana is categorized in one of four class sizes based on total enrollment: AA (largest), A, B, C (smallest).
 - Each class size will receive a minimum of one review each biennium from the OPI MOA team.

2. Selection of Subrecipients for Compliance Reviews

The OPI MOA team will coordinate efforts with Perkins V state monitoring conducted by OPI CTE Division Specialists to better align overall monitoring of CTE programs for secondary subrecipients and lessen the burden on subrecipients in Montana.

- i. The OPI will select a minimum of two subrecipients for review each year.
 - The OPI will select a minimum of one subrecipient from each class size (AA, A, B, C) for review each biennium.
 - The OPI may select more subrecipients for review, if needed.
- ii. The OPI will use the following selection criteria to develop a ranked list of secondary subrecipients to select for compliance reviews:
 - Time since last visit
 - Number of CTE programs
 - Total male enrollment vs. % of males in CTE programs
 - Total female enrollment vs. % of females in CTE programs
 - Total disability enrollment vs. % of disability in CTE programs
 - Total enrollment by race vs. % of race in CTE programs

iii. The OPI MOA team will coordinate with the OPI's CTE Division Specialists to utilize the following additional criteria for selecting secondary subrecipients for compliance reviews:

- Geographic location
- Date of last Perkins V monitoring
- Date of future Perkins V monitoring to be conducted

3. Notifying Subrecipients of Compliance Reviews

The OPI will notify via e-mail and phone call all secondary subrecipients selected to receive compliance review. The notification will include:

- An explanation of the reason and authority for the review
- A description of the process of the review
- A timeframe for the review
- A request for materials to submit for the review

4. Conducting Compliance Reviews

- i. Staff from the OPI will review all issue areas of secondary subrecipients selected for compliance reviews.
- ii. The OPI will implement a variety of techniques for each review. The methods used for each review may vary based on geographic location, weather conditions, staff, and resources of subrecipients, number of interviews, and other external circumstances. The techniques used for reviews may include but are not limited to:

- Facility reviews
- Desktop reviews
- In-person interviews
- Phone or digital interviews
- Policy and document review
- Website review
- Data analysis
- Surveys

5. Notification of Compliance Review Findings

Secondary subrecipients selected for compliance reviews will receive a Letter of Findings (LOF) within sixty (60) days of completion of the review. The LOF will

include the results of the review and notify subrecipients of any necessary further action or recommendations.

6. Voluntary Corrective Actions

The OPI requires secondary subrecipients found to be in noncompliance to submit a Voluntary Compliance Plan (VCP) to remedy issues and gain compliance with nondiscrimination laws. As part of the MOA Compliance Program, the OPI will provide technical assistance to subrecipients to facilitate compliance

i. Components and Timeframe of the VCP

Subrecipients found to be in noncompliance must prepare and submit a VCP to the OPI within forty (40) days of receipt of the LOF from the OPI detailing how the subrecipient will address the findings and recommendations contained in the LOF. After submitting the VCP, subrecipients will have twenty (20) days to negotiate the details and timeline of the VCP with the OPI.

ii. Monitoring Process

After negotiation, the VCP will take effect and the OPI will keep in communication (electronic, in-person, or other methods of communication) with the subrecipient to evaluate whether the subrecipient addresses the findings and recommendations in the LOF and gains compliance with nondiscrimination laws.

iii. Notification to Office of Civil Rights

The OPI will report to OCHE findings for secondary subrecipients that fail to take corrective actions to remedy issues of noncompliance found during compliance reviews. OCHE will report the findings to the Office of Civil Rights (OCR). The reports will include documentation indicating the extent and efforts made to assist subrecipients to take corrective actions. OCHE will submit the reports to OCR within thirty (30) calendar days after determining that voluntary compliance was not achieved.

7. Notifying Subrecipients of the Conclusion of Compliance Reviews

The OPI will notify secondary subrecipients of the conclusion of each compliance review within thirty (30) days of the last evaluation of VCP or report of noncompliance to OCR, whichever comes later.

8. Timeline of Secondary Compliance Program

The approximate timeline of the Secondary Compliance Program will be as follows:

- June – August: Data collection and analysis and selection of subrecipients for compliance reviews
- September-November: Notification of selection for compliance review
- October – March: Compilation of necessary documentation
- October – April: Conduct compliance review
- Notification of desk or on-site compliance review findings to follow review
- Submission and completion of VCPs to follow submission of LOFs and VCP negotiations

III. TECHNICAL ASSISTANCE

This section describes Montana’s plan to conduct outreach to subrecipients, offer technical assistance, and let subrecipients request technical assistance to improve access to CTE programs and help prevent, identify, and remedy unlawful discrimination.

A. Technical Assistance Objectives

- i. To assist subrecipients to comply with issues identified in compliance reviews
- ii. To assist subrecipients to comply with federal nondiscrimination laws
- iii. To assist subrecipients through the procurement of other materials which are deemed necessary for compliance
- iv. To assist subrecipients through the identification of available funds to support equity activities
- v. To assist subrecipients in understanding the mandates of equity legislation

B. Notifying Subrecipients of the Availability of Technical Assistance

- i. The availability of technical assistance will be publicized but not limited to the following:
 - At the time of desk audit compliance review notification

- At the time of on-site compliance review notification
- During desk audit compliance review
- During on-site compliance review
- In the Letter of Findings (LOF)
- During the development of the Voluntary Compliance Plan (VCP)
- In e-mails to all subrecipients
- In each grant notification delivered to all subrecipients receiving federal funds through Perkins V

C. Types and Frequency of Technical Assistance

The MOA Compliance Program will offer the following types of technical assistance to subrecipients:

- i. Responses to e-mail, phone, and written inquiries (on demand)
- ii. On-site consultations (by request)
- iii. Off-site consultations via remote technology (by request)
- iv. E-mails identifying technical assistance resources (per resource availability)
- v. Webinars (per resource availability)

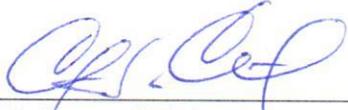
D. Technical Assistance Personnel

The staff from OCHE and the OPI that perform compliance review activities will also carry out technical assistance for subrecipients.

- i. The OCHE MOA Coordinator and CTE team will provide technical assistance to postsecondary subrecipients.
- ii. The OPI MOA Coordinator, OPI MOA team, and OPI CTE Division Specialists will provide technical assistance to secondary subrecipients.
- iii. OCHE and the OPI will coordinate to provide regular, proactive technical assistance for all secondary and postsecondary subrecipients through e-mails and via training and webinars.

AUTHORITY AND SIGNATURE

The following OCHE personnel approve Montana's Methods of Administration State Plan:



Commissioner of Higher Education
Office of the Commissioner of Higher Education
Montana University System
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Helena, MT 59601

6/22/2020
Date

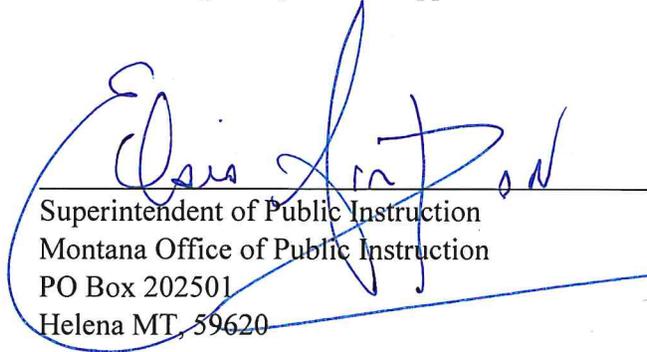


State CTE Director
Office of the Commissioner of Higher Education
Montana University System
560 N Park Ave
Helena, MT 59601

6/22/2020
Date

AUTHORITY AND SIGNATURE

The following OPI personnel approve Montana's Methods of Administration State Plan:



Superintendent of Public Instruction
Montana Office of Public Instruction
PO Box 202501
Helena MT, 59620

6/30/2020

Date



CTAE Unit Manager
Montana Office of Public Instruction
PO Box 202501
Helena MT, 59620

6/30/2020

Date