

NUMBERED MEMO CC26-053

TO: College Presidents

FROM: Dr. Robert Van Dyke, Associate Vice President for Federal Programs

SUBJECT: Federal MOA Requirements and NCCCS ADA Accessibility Technical Assistance

DATE: September 16, 2026

On July 23, 2026, the U.S. Department of Education (ED) formally rescinded Appendix B to Title 34 of the Code of Federal Regulations (CFR) Part 100, commonly known as the Methods of Administration (MOA) Guidelines. These guidelines previously required state agencies to conduct civil rights compliance reviews of recipients operating Career and Technical Education (CTE) programs. ED's action eliminates the federal requirement for states to conduct MOA reviews and maintain associated monitoring processes.

As a result, NCCCS will sunset its MOA review process and will no longer conduct MOA reviews of colleges. Additionally, consistent with federal actions taken following the elimination of the MOA program, colleges will not be required to submit corrective action documentation related solely to Voluntary Compliance Plans (VCPs) that originated through the MOA process.

While the MOA guidelines have been eliminated, the underlying federal civil rights and accessibility laws remain fully in effect. Community colleges continue to be responsible for compliance with applicable federal requirements, including:

- Title VI of the Civil Rights Act of 1964;
- Title IX of the Education Amendments of 1972;
- Section 504 of the Rehabilitation Act of 1973;
- The Americans with Disabilities Act (ADA); and
- Other applicable federal and state civil rights laws governing educational programs and services.

To support colleges in maintaining broad access to CTE programs, NCCCS will offer a voluntary ADA and accessibility compliance review process during the Perkins comprehensive monitoring

process. The purpose of this effort is not regulatory enforcement and will not constitute a monitoring activity, audit, compliance determination, or binding corrective action process.

Under this approach:

- Participation by colleges under a comprehensive monitoring visit will be voluntary.
- Reviews will focus on promoting universal access and reducing barriers for students participating in CTE programs.
- NCCCS staff may provide observations, recommendations, resources, and technical assistance related to accessibility and program access.
- Any recommendations provided will be advisory in nature and will not create mandatory corrective actions or compliance obligations beyond those already established by law.
- Colleges will retain full responsibility for determining how to address accessibility and civil rights obligations under applicable federal and state laws.

NCCCS believes this collaborative model will help colleges identify opportunities to improve access to CTE programs while reducing administrative burden associated with the former MOA process. Our intent is to continue supporting institutions in providing inclusive learning environments and equal educational opportunities for all students.

Additional information regarding the voluntary review process and available technical assistance resources will be shared with colleges during the upcoming academic year.

Thank you for your continued commitment to ensuring that North Carolina's community colleges provide accessible, high-quality educational opportunities for all students.

Should you have questions regarding this memorandum, please contact the Federal Programs Office.