UNITED STATES DEPARTMENT OF EDUCATION

August 11, 2026

Dr. David Moore
Superintendent

Sent via email only to: [redacted content]

Re: Coalinga-Huron Unified School District
OCR Case No. 09-25-3122

Dr. David Moore:

This is to notify you of the disposition of the above-referenced complaint filed with the U.S. Department of Education (Department), Office for Civil Rights (OCR), against the Coalinga-Huron Unified School District (District). The complainant alleged that the District discriminated against persons with mobility disabilities at Coalinga High School (the School) because:

1. the School does not provide an accessible route for both the main entrance and the main office;

2. the School does not provide access to programs and activities located on the second floor of the East Wing;

3. the West Wing elevator is regularly locked, restricting access to programs and activities located in the basement and on the second floor;

4. the counseling office located in the West Wing is not accessible; and

5. there is no appropriate emergency evacuation plan for students with mobility disabilities.

OCR enforces Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability by recipients of federal financial assistance; and Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. Sections 12131 et seq., and its implementing regulation at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability by public entities. As a recipient of federal financial assistance from the Department and as a public entity, the District must comply with Section 504, Title II and their implementing regulations.

Summary of OCR's Investigation to Date

OCR interviewed the complainant and reviewed information provided by the District, including documentation regarding the School's construction and alteration dates; data about entrances; and the School's Safety Plan. OCR also reviewed publicly available images of the School. Based

on this review, OCR identified compliance concerns regarding access and signage to the School's accessible entrances, access to programs and activities in the School buildings, and access to emergency evacuation procedures. To resolve this complaint, the District entered into the attached Resolution Agreement (Agreement) which, when implemented, will address the Section 504 and Title II compliance concerns. The applicable legal standards, factual findings, and reasons for the determinations in this matter are summarized below.

Legal Standards

Both the Section 504 and Title II implementing regulations provide that no qualified individual with a disability may be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any services, programs, or activities because a public entity's facilities are inaccessible or unusable.

Physical Accessibility

The accessibility of facilities and facility elements is evaluated under the applicable requirements of Section 504, Title II, and the 2010 Americans with Disabilities Act Standards for Accessible Design (2010 Standards). The regulations implementing Section 504 and Title II contain two standards for assessing accessibility: one for "existing facilities" and one for "new construction" and "alterations." The date when construction or alterations began determines which standard applies.

Existing Facilities

Under Section 504, existing facilities are those for which construction or alteration began before June 3, 1977. Under Title II, existing facilities are those for which construction began before January 26, 1992. For these facilities, accessibility is determined under the "program accessibility" standard. Program accessibility requires that a recipient operate its programs, services, and activities so that, when viewed in their entirety, they are accessible to and usable by individuals with disabilities. Recipients may meet this requirement by relocating programs or services to accessible buildings, modifying existing facilities, or using other effective methods that ensure access. Structural changes are not required if other approaches will achieve program accessibility. When determining how to provide access, recipients must prioritize methods that allow individuals with disabilities to participate in the most integrated and safe setting appropriate.

Because architectural changes may be needed to achieve program accessibility, accessibility guidelines may be used as references. For Section 504, the Uniform Federal Accessibility Standards (UFAS) or the 2010 Standards may be used as guidance. Under Title II, the 2010 Standards may be used as guidance for evaluating elements of existing facilities.

Both Section 504 and Title II also require recipients to ensure that individuals, including those with vision or hearing impairments, can obtain information about the location of accessible services, activities, and facilities. Recipients must post signs at inaccessible entrances directing users to accessible entrances or to locations where accessibility information is available. Accessible entrances must display the International Symbol of Accessibility. If a recipient

relocates programs or activities for accessibility purposes, it must provide reasonable notice to students, parents, and others who may need this information.

New Construction and Alterations

Facilities built or altered after the dates identified above must be readily accessible to and usable by individuals with disabilities. Any alteration that affects usability must, to the maximum extent feasible, result in the altered portion being accessible. The specific technical standards that apply depend on when construction or alteration commenced, because federal regulations have adopted different standards over time.

Under Section 504:

• Facilities constructed or altered from June 3, 1977, to January 18, 1991, must meet the American National Standards Institute (ANSI) standards.
• Facilities constructed or altered on or after January 18, 1991, must meet UFAS.
• For construction or alterations starting on or after March 15, 2012, recipients may choose UFAS or the 2010 Standards.

Under Title II:

• January 26, 1992 – September 14, 2010: UFAS or the 1991 ADA Standards.
• September 15, 2010 – March 14, 2012: UFAS, the 1991 Standards, or the 2010 Standards.
• Beginning March 15, 2012: the 2010 Standards are required.
• Any non-compliant construction or alterations completed before 2012 must still meet the requirements of the 2010 Standards.

Maintenance of Accessible Features

Title II also requires public entities to keep accessibility features of their facilities and equipment in good working order so individuals with disabilities can use them. Temporary interruptions due to maintenance or repairs are permitted, but features that provide access – such as ramps, pathways, elevators, and accessible entrances – must generally be maintained in operable condition.

Emergency Evacuation Procedures for Individuals with Mobility Impairments

Section 504 and Title II require public schools to administer their programs, services, and activities in a manner that does not discriminate based on disability. This obligation includes emergency preparedness and evacuation procedures. A school must ensure that its emergency evacuation policies and practices provide qualified individuals with mobility impairments an equal opportunity to evacuate safely during emergencies. When necessary to avoid discrimination based on disability, a school must make reasonable modifications to its emergency procedures, including developing individualized evacuation procedures when appropriate. In determining whether a school has met its obligations, OCR considers whether the school has reasonably planned for the safe evacuation of individuals with mobility impairments,

assigned appropriate staff responsibilities, and implemented procedures that provide meaningful access to emergency evacuation consistent with Section 504 and Title II.

Findings of Fact

The School is a connected structure comprised of the Administrative Building and the East and West Wings. The West Wing was constructed in 1934, and the Administrative Building and East Wing were constructed in 1938. Both wings include a second floor. According to information provided by the District, portions of these facilities, including the Administrative Building, the East and West Wings, doors, the counseling office areas, and the West Wing elevator were reconstructed between 1986 and 1989. The District confirmed there have been no renovations since then.

Main Entrance to the School

The complainant alleged that the main entrance to the School and the main office located in the Administrative Building are not accessible because the entire building is elevated and the main entrance has stairs with no ramp. The District acknowledged that the main entrance lacks a ramp but indicated that there are two accessible entrances located at the back of the School. The complainant states that a single ramp exists at the back of campus, but it is difficult to access due to fencing and requires staff to unlock the gate for use. OCR reviewed publicly available photos of the School, which did not reflect visible signage located at the inaccessible front entrances of the Administrative Building, East Wing, or West Wing directing individuals to an accessible entrance.

East and West Wings

The complainant alleged that the School does not provide an accessible route to programs and classes located on the East Wing's second floor. The District confirmed that the East Wing does not have an elevator to provide access to second-floor classrooms and programs. Although the District reported that a ramp exists "nearby," it did not clarify whether the ramp provides access to the second floor or whether it has a process for relocating programs and activities to the first floor to provide access if needed.

The complainant also alleged that the West Wing elevator is regularly locked, restricting access to classrooms and programs located in the basement and on the second floor. According to the complaint, when the elevator is locked, students with mobility disabilities must wait for staff to unlock it, and there are no alternative accessible routes to the basement and the second floor. The District reported to OCR that an elevator provides access to both the basement and the second floor of the West Wing, which is turned on each morning before school begins. The District did not dispute that access could be delayed if the elevator is locked.

Counselor's Office

The complainant alleged that the West Wing counselor's office can only be reached by stairs and lacks a ramp. The District reported that counseling services are available in multiple locations, including the West Wing counselor's office, and that all offices are accessible.

Emergency Evacuation Procedures

The complainant alleged that the District does not have an appropriate emergency evacuation plan for students with mobility disabilities. The District's School Safety Plan (the Plan) provides emergency evacuation procedures for students, including students with mobility disabilities at the School. The Plan assigns specific staff to assist and evacuate students in wheelchairs and references an "impaired mobility list" that includes the location of identified students throughout the school day. The Plan does not address staff, visitors, or individuals with disabilities other than mobility disabilities (e.g., sensory-related disabilities, intellectual disabilities).

The School's website does not inform parents/guardians or visitors with disabilities how to request access to programs and activities or that the entrance(s) at the back of the campus is the School's designated accessible entrance.

Analysis

Allegations #1-4

Based on the District's reported dates of construction and alteration, the ANSI standards apply to altered portions of the Administrative Building and the East and West Wings. The District indicated that it is currently in the process of planning accessibility improvements at the School to address physical barriers affecting entrances, vertical access, and interior routes.

Based on the evidence collected to date, OCR has concerns that the District may not presently provide effective access to persons with disabilities to the main entrance to the School and the main office located in the Administrative Building, as the accessible entrances are reportedly at the back of the School, which is enclosed by a fence. In addition, it does not appear that the District provides appropriate notice as to the existence and location of entrances, services, activities, and facilities that are accessible to and usable by persons with disabilities or its willingness to move programs and activities to provide access. With respect to the East Wing, the lack of an elevator prevents students and other individuals with mobility disabilities from accessing second-floor programs and classes. Regarding the West Wing, although an elevator exists, access is inconsistent when the elevator is locked or when the pathway to it is obstructed. As for the counseling office, the complainant's report of a stair-only entrance raises concerns about physical access, and OCR requires further verification to determine whether counseling services are available in locations that are readily accessible to individuals with mobility disabilities.

Allegation #5

Regarding the School's emergency evacuation procedures outlined in the Plan, although the Plan designates staff responsible for assisting mobility-impaired students, it does not address nonstudents with disabilities or other kinds of disabilities that may impact access to evacuation procedures. In addition, the Plan lacks identification of accessible evacuation routes (including contingency measures when the elevator is unavailable) and evacuation equipment, raising concerns that students with mobility disabilities may not have an equally effective means of evacuation.

Conclusion

The District expressed an interest in resolving the complaint prior to the conclusion of OCR's investigation pursuant to Section 302 of Case Processing Manual (CPM) (Feb. 19, 2025). OCR determined resolution is appropriate because OCR's investigation to date identified issues that can be addressed through a resolution agreement (Agreement).

The attached Agreement requires the District to conduct a self-assessment of the following to determine whether each complies with the governing accessibility standard and to remedy any areas of noncompliance: the accessible route to the School's main entrance and the main office; access to programs and activities located on the second floor of the East Wing; the West Wing elevator, including whether it is regularly locked; the West Wing counseling office; and any other barriers affecting access for persons with mobility disabilities. The Agreement further requires the District to evaluate and revise, as necessary, its emergency evacuation plan and to conduct staff training and an evacuation drill on the revised plan. The District agreed to implement the Agreement, which will address the compliance concerns OCR identified in this case. OCR will monitor the implementation of the Agreement until it determines that the District has satisfied the commitments made under the Agreement.

This concludes OCR's investigation of the complaint and should not be interpreted to address the District's compliance with any other regulatory provision or to address any issues other than those addressed in this letter. This letter sets forth OCR's determination in an individual OCR case. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public. The complainant may have a right to file a private suit in federal court whether or not OCR finds a violation.

Please be advised that the District must not harass, coerce, intimidate, discriminate, or otherwise retaliate against an individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a retaliation complaint with OCR.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. If OCR receives such a request, it will seek to protect, to the extent provided by law, personally identifiable information, that, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

If you have any questions about this letter, you may contact Salina Lopez by e-mail at salina.lopez@ed.gov.

Sincerely,

/s/

Lori Bringas
Team Leader