

**Comprehensive Site Visit
Iowa Department of Education**



**Keokuk Community
School District**

**Team Findings
April 27-29, 2009**

Iowa Department of Education
Grimes State Office Building
400 E. 14th St
Des Moines, Iowa 50319-0146

Vision, Mission, and Goals

In an improving district/school, the vision, mission, and goals are clearly communicated in the school and community. Stakeholders understand and share a commitment to the district/school expectations, goals, priorities, assessment procedures, and accountability. The vision guides allocations of time and resources. Evidence includes, but is not limited to, the following:

- Clearly articulated mission is established collaboratively with stakeholder groups representing the diversity of the community.
- Vision, mission, and goals are communicated throughout the system and community.
- The vision and mission of the district/school guide teaching and learning.
- Every five years, the comprehensive needs assessment process, with input from stakeholders, is used to review and revise the beliefs, mission, and/or vision; major educational needs; and student learning goals.
- Academic and academic-related data are analyzed and used to determine prioritized goals.
- Goals guide assessment of student achievement, district/school effectiveness, and the allocation of time and resources.
- The vision, mission, and goals support core values of respecting and valuing diversity.

Noted Strengths:

1. Keokuk Community School District (CSD) is currently involved in strategic planning for continued school improvement. In this process the district revisited priorities, revised the mission statement, and articulated seven strategic objectives. Documents have been created outlining the "Beliefs of The Keokuk School District" and "The End Game", articulating curriculum goals to support this work. This planning can serve as a structure to align school improvement efforts as the district emerges from a transitional period in leadership and deals with the implications of current state and national economic issues.
2. The district actively seeks input from staff and the community by utilizing surveys and providing opportunities for stakeholder communication. This input can support strategic planning and school improvement efforts. Strategies and resources mentioned by interview groups included:
 - What Works in Schools survey
 - Board survey of staff and community
 - Town Hall Meetings
 - Iowa Youth Survey
 - School Improvement Advisory Committee

Recommendations for Improvement:

3. To support the district's strategic planning initiative, consider creating a framework for collecting and analyzing data necessary to enact the mission and achieve the strategic goals. For example, the mission statement indicates students will be "active participants" and "adaptable and critical thinkers." Is there a common understanding among staff about what an "active participant" looks like or what "adaptive and critical thinkers" means? What data might indicate the degree to which teacher behaviors are occurring to support this environment? Similarly, in

relation to district strategic objectives, do staff and stakeholders have a common understanding of what constitutes “programs that actively engage and assist students?” What data might be collected to determine the extent to which staff exhibit the behavior, knowledge or skills to actively engage students? As these statements are revised, consider developing a variety of avenues to ensure they are visible and understood by all.

Leadership

In an improving district/school, leaders communicate a shared sense of purpose and understanding of the district/school’s core values. Leaders have a visible presence, provide resources and ensure two-way communication between the educational system and stakeholders. Leaders provide encouragement, recognition, and support for improving student learning and staff performance. Leadership is committed, persistent, proactive, and distributed throughout the system. Evidence includes, but is not limited to, the following:

- Policies and procedures are established to effectively support district/school operations.
- Policies and practices are implemented to reduce and eliminate discrimination and harassment and to reflect, respect, and celebrate diversity.
- The role and responsibility of administrative leaders is supported, respected, and understood.
- A clearly defined system and expectations are established for the collection, analysis, and use of data regarding student achievement and progress with the Comprehensive School Improvement Plan (CSIP).
- The capacity of staff, students, and parents to contribute and lead is built and supported.
- Opportunities for participation are provided for input, feedback, and ownership for student and system success among staff, students, parents, and community.
- Equity in access to learning opportunities and compliance with local, state, and federal legislation is ensured.

Noted Strengths:

4. High school students reported several opportunities for the development of leadership skills and for offering input as the school and district make decisions. For example, high school students are selected as representatives to the school board. Identified students receive monthly board member packets, review the information, and provide input to the board on topics of interest. Some high school students serve on the district’s School Improvement Advisory Committee (SIAC) and have served on teams in the district’s Strategic Planning process. Additional student leadership opportunities mentioned included the following:
 - Monthly student ambassadors to Rotary
 - Peer mediators
 - 8th grade leadership team
 - BOUNCE program for upperclassmen to mentor incoming ninth graders
 - Student activities and clubs

Keokuk also offers Konnections, an after-school activity for high school and middle school students, to provide additional leadership and service opportunities. This group of students volunteers and visits the local food pantry monthly to help organize

food items, rake yards for senior citizens, listen to elementary students read, and engage in other positive community and district service activities.

5. The Keokuk board of education serves an important role in district leadership as members address district concerns and priorities. Board members commented that they voice differing viewpoints, engage in discussion, and ultimately reach consensus. There are clearly defined board meeting expectations and protocols which are articulated in a district publication and followed at each meeting. Keokuk CSD school board members take steps to understand the operations of the district and to communicate district information to constituents. Each board member serves as a team member on one of the seven district goal teams. Board meetings are alternately held in district buildings and broadcast over public access TV, allowing broader opportunities for constituents to remain informed. Students serve as non-voting members to inform the board of student opinions and ideas.
6. Interview groups noted positive administrative leadership. The following were specifically mentioned as strengths:
 - Effective communication with staff, parents, and community members
 - Attention to staff and student needs
 - Accessibility to staff, board, parents, and students
 - Participation on district committees
 - Participation in professional development
 - Willingness to find ways to provide materials and classroom resources
7. Interviewees noted multiple ways in which the district communicates with stakeholders throughout the district. They shared the following examples of effective practices in the district:
 - District information in local newspapers and on radio stations
 - The district website
 - Monthly newsletters
 - Individual classroom newsletters at the elementary
 - *PowerSchool*
 - Emails and phone calls to and from teachers and parents
 - Public meetings to problem-solve regarding the district's high dropout rate
 - Regular publication of articles about the schools in the daily newspaper, *Daily Gate City*
 - Insertion of the school newspaper, *Smoke Signals*, into the *Daily Gate City* for distribution throughout the community
 - Televised School Board meetings

Additionally, the district publishes a comprehensive annual Report to the Community booklet available to all district patrons. In addition to required annual reporting data points, Keokuk CSD includes enrollment data, staff information, building reports, Kidz Zone data, financial data and "Points of Pride", along with reader-friendly explanations. This serves to keep all patrons informed.

Recommendations for Improvement:

8. Interviews indicated some programs and practices are carried out inconsistently from building to building, particularly at the elementary level. The district is encouraged to convene principals and leadership teams to examine current practices, and create common expectations for delivery of programs or various initiatives (e.g., Gifted and Talented, At Risk, Special Education, libraries, Title I) so that all students, regardless of building assignment, can have the same educational opportunities. It was noted that students arrive at middle school with different knowledge base, skill sets, and experiential backgrounds that can be attributed to their elementary placement. Perhaps the work with the Iowa Early Learning Standards and the Iowa Core Curriculum for grades pre K-12 can provide a format to help bring consistency to district programming and initiatives. Coordination and consistency of efforts will provide equitable educational opportunities for all Keokuk students. As stated in the May 2004 site visit report, "The demographic data indicate that a more equitable distribution of services may equalize opportunities for all students." The district is encouraged to give serious consideration to this recommendation.

9. Following the site visit, Keokuk CSD will rewrite the district Comprehensive School Improvement Plan (CSIP). As the School Improvement Advisory Committee (SIAC) addresses its role in CSIP writing, the group might wish to review the requirements in Chapter 12, updated after the 2007 legislative session. (281—IAC12.8 (1)(a)(2). It reads as follows: "To meet requirements of Iowa Code section 280.12(2) as amended by 2007 Iowa Acts, Senate File 427, section 2, the board shall appoint and charge a school improvement advisory committee to make recommendations to the board. Based on the committee members' analysis of the needs assessment data, they shall make recommendations to the board about the following components:
 - Major educational needs;
 - Student learning goals;
 - Long-range goals that include, but are not limited to, the state indicators that address reading, mathematics, and science achievement; and
 - Harassment or bullying prevention goals, programs, training, and other initiatives."

The district is encouraged to expand SIAC membership and participation of people who are not directly connected to the school, i.e., senior citizens, parents of preschoolers, local business representatives, and/or recent graduates, and to address the gender imbalance on the committee.

Collaborative Relationships

In an improving district/school, stakeholders understand and support the mission and goals of the district/school and have meaningful roles in the decision-making process. Collaboration results from a culture of participation, responsibility, and ownership among stakeholders from diverse community groups. Educators in the system develop and nurture a professional culture and collaborative relationships marked by mutual respect and trust inside and outside of the organization. The system works together with balance between district direction and school autonomy. Evidence includes, but is not limited to, the following:

- Instructional staff is provided opportunities for interaction to focus on professional issues.
- Instructional staff constructively analyzes and critiques practices and procedures.
- Instructional staff follows established procedures to resolve professional conflicts, solve problems, share information about students, and communicate student information to parents.
- Processes and procedures that invite and respect stakeholder input, support, and interaction are implemented by the district/school.
- Parents are involved as partners in the educational process.
- Positive alliances among school staff, students, parents, and diverse community groups are created and nurtured.

Noted Strengths:

10. Keokuk CSD has established working relationships with several area businesses, local non-public schools and service groups, resulting in partnerships supporting the students and programs of the district. Local collaborations include:
 - Statewide Voluntary Preschool Program with the local nonpublic school
 - Vision Keokuk
 - Fund raising and construction of a new weight room
 - YMCA partnership for mutual use of the two facilities
 - Grand Theater auditorium for concerts and plays
 - Fine Arts Council (Artists in Residence)
 - Field house use by local groups for gatherings
 - Public library collaborations
 - Classes with Southeastern Community College (SCC)
 - Church facilities for prom and teacher in-service meetings
 - Use of school buildings by various community groups
 - Love and Logic training for any interested persons in the community
 - Senior citizens dinner during the holidays, including musical performances by students

11. A variety of partnerships between the district and community support student learning. Community partners described partnerships including the following:
 - The Ethical Decision-Making seminar was developed by the Chamber over fifteen years ago for high school juniors in the tri-state area. Approximately 120 students participate in the day-long seminar and engage in decision-making simulations around critical real-life issues. Local businesses leaders serve as facilitators and provide lunch for the group.

- Individuals from area businesses visit classrooms to help support and promote employability skills. They speak to students about the interview process, developing resumes, as well as how to dress for the work environment.
- Kids Connection high school volunteer group provides opportunities for students to volunteer in the community, including the Chamber of Commerce.
- The high school hosts a Career Day. Colleges are represented and community members speak to students about their careers. In addition, the Chamber has a booth and encourages students to consider living and working in the community.
- Keokuk has a Volunteers in Public School Program which invites senior citizens to work with teachers, primarily in elementary and middle schools.
- The high school and Chamber of Commerce sponsor 2-5 students to attend a week-long business camp through Association of Business and Industry (ABI).
- Keokuk Economic Development Corporation made a report to the district about needs the community sees (employability needs and connections to school Career and Technical Education (CTE) programs), in particular in relation to how schools can better prepare students
- The Rotary Exchange Ambassador preschool teacher from Taiwan participated in the preschool program during her visit.
- Lee County Conservation Board offers opportunities for preschool children to learn about the environment in southeast Iowa.
- The Learning Center collaborates with Southeastern Community College (SCC), Iowa Workforce Development, and the juvenile court system to benefit students.

Recommendations for Improvement:

12. District special education paraprofessionals expressed dedication to the teachers and students with whom they work. They felt that their effectiveness would be improved, however, by on-going opportunities to consult with special education/ general education teachers. Knowledge of Individual Education Plan (IEP) recommendations addressing instructional goals and regular consultation with teachers would improve student outcomes. In addition, appropriate professional development opportunities suggested by supervising teachers would provide disability-specific information critical to ensuring that appropriate IEP services are being provided, as required by statutes.
13. Multiple interview groups spoke about district programs and initiatives that have been funded through successful grant writing including equipment for the weight room, the high school Success Center, and Kidz Zone. Interviewees expressed appreciation for the opportunities provided through grant funds and expressed hope that additional grant funds could be identified. As the district identifies future grant funds ensure sustainability of grant programs is explored to allow for the continuation of programs or initiatives after funds conclude, as well as equity in programming for all district students.
14. Non-instructional support staff (secretaries, food service, bus drivers, and custodians) reported limited opportunities to provide input on matters of importance. They expressed concern that when they are not included in staff meetings where information is shared, they miss discussions and information shared with

instructional staff that may be helpful in their work with students. Consider identifying a mechanism at each school to ensure non-instructional staff members have the opportunity to receive and provide input regarding information that may be helpful to them as they do their jobs, such as changes in building schedules or student behavior expectations.

15. Multiple interview groups affirmed the importance of partnering with parents to strengthen student achievement. Identified staff attended Karen Mapp training to support continued development of partnerships between schools and parents; however, interviewees did not speak to district efforts to implement practices introduced in the training. Evidence demonstrates schools that welcome and provide support for strong family partnerships experience higher levels of respect and trust in the community, as well as among school staff and their families. Schools that contain all three partnership aspects, welcoming, honoring, and linking to learning, create environments that best support learning and achieve effective school, family and community partnerships (Karen Mapp, *Beyond the Bake Sale*, 2007). For additional information regarding effective school/family partnerships refer to the Iowa Statewide Parent Information Resource Center website at www.iowaparents.org. For assistance, contact Shelli Blazic, Great Prairie AEA Consultant, at shelli.blazic@gpaea.k12.ia.us or 319-753-6561 ext. 1133.

16. While the Vocational Advisory Committee met during the 2008-2009 school year, CTE teachers reported the committee has met infrequently or not at all for several years. The high school is encouraged to utilize the Vocational Advisory Committee to its full potential, not only in providing input into planning CTE programs, but also in evaluating the effectiveness of CTE programs. For example, when adjustments are made in CTE courses and programs, identify the intended outcomes. Develop measures for data collection to determine achievement of the intended outcomes and review the results with the Vocational Advisory Committee. As the vocational committee makes plans for future meetings, consider state compliance requirements including:
 - Membership composition includes persons representing business, health occupations, industry, and labor and is appointed by the school board.
 - Membership fairly represents gender and minority representation in the school district.
 - The committee meets at least once each year.
 - The committee provides assistance with vocational education planning and evaluation.

Learning Environment

In an improving district/school, the school environment is conducive to teaching and learning. The environment is safe, orderly, purposeful, and free from threat of physical, social, and emotional harm. Teachers are familiar with students' cultures and know how to work effectively in a multi-cultural setting. Classrooms are integrated with diverse learners (i.e., gender, race, special needs, at-risk, gifted). Students are guided to think critically about learning and have opportunities to apply learning to real world situations. Evidence includes, but is not limited to, the following:

- Rules and procedures for behavior and consequences are clearly communicated and consistently administered.
- School facilities are physically accessible and school routines enhance student learning.
- Materials, resources, technology, programs, and activities reflecting diversity are available to all students.
- The district/school provides a clean, inviting, welcoming environment.
- A clearly understood crisis management plan is established, communicated, and implemented when necessary.
- Teaching and learning are protected from external disturbances and internal distractions.
- The district/school reflects the contributions and perspectives of diverse groups and preserves the cultural dignity of staff, students, and parents.

Noted Strengths:

17. Keokuk CSD has taken steps to help students through the transitions from one building to the next. The move from middle school to high school is facilitated by the BOUNCE program. One BOUNCE mentor is assigned to five or six eighth grade students, continuing the relationships into 9th grade. As 5th graders prepare to go to middle school, students participate in an exchange day where they go to 6th grade and walk through a schedule, including lockers, lunch, and passing time. The move from preschool to kindergarten is facilitated through preschool teachers' involvement in the Lee County Transition Team and children participate in Kindergarten Rodeo.
18. Counselors, teachers, and high school students noted the value of Career Fair Day, an annual event involving collaboration with community businesses and industries. High school students have the opportunity to learn about a wide variety of careers through speakers and handouts, engage in mock interviews, and submit resumes. The event is coordinated by CTE teachers. A Career Fair is also held at the middle school with middle school students taking part in planning and organizing the event.
19. The high school principal, vice principal, as well as support staff reported an increasingly positive learning environment. Examples of positive changes included the following:
 - Greater numbers of teachers help monitor hallways during transition time
 - The addition of the vice principal, resulting in greater consistency in discipline and promptness in dealing with incidents.
 - Changes in the school lunch program at the high school resulting in more orderly procedures.

- Logging discipline reports and utilizing these data to identify patterns
- Involvement of the School Resource Officer (SRO) to assist in addressing issues.

It was noted that building principals' visibility and actions have supported the positive learning environment as well. Interviewees mentioned that administrators develop partnerships with parents and deal with reported behavior incidents in a timely manner.

20. Non-instructional support staff reported pride in their contributions to a positive learning environment. Examples included the following:
- Gathering supplies for teachers and students and supporting their activities
 - Keeping facilities clean and inviting; as well as construction of a trophy case and help in constructing the new weight room
 - Providing a welcoming environment as the first staff members students encounter upon arriving at school
 - Providing breakfast at all schools, creating a happy and healthy environment in the morning
 - Preschool para-educator riding the bus to ensure safety and comfort of preschool students
 - Working collaboratively to coordinate efforts between buildings and develop positive rapport among support staff, teachers, administrators, students, and parents
 - Clerical staff coordinating efforts between buildings
 - Maintaining good rapport and commitment to working well together
 - Offering a summer lunch program available to anyone ages 2-18
21. Keokuk CSD has received a Carol White Physical Education grant to supplement wellness efforts in the district. This resulted in additional training and equipment for physical education teachers to promote lifelong fitness in students. In addition, the district took the advice of students in adding a salad bar to the lunch offerings, resulting in some healthier nutritional options for student lunches.
22. Teachers, administrators, and parents reported proactive steps the district has taken to address bullying and harassment. Examples included the following:
- Assemblies addressing cyber-bullying
 - Home room discussions about character attributes
 - "Zero Tolerance" policy
 - Rachael's Challenge, Friends of Rachel student organization
 - Peer mediation at the middle school
 - K-12 Character Counts initiative

Recommendations for Improvement:

23. The district is encouraged to align wording on all district documents with board policy containing the language required from legislation passed in 2007 concerning

harassment, bullying, and definitions of protected classes. Some policies have been changed, but other district documents do not reflect this. This language must be consistent in all related policies and district publications. (See noncompliance matrix)

24. Interviewees indicated incidences of bullying and harassment occur infrequently; however, comments from students included, "Teachers don't see what happens", and "Small things just get ignored and build up." In order to verify perceptions, the visiting team encourages the district to keep careful documentation for every incident of bullying and/or harassment, even if it is resolved at an early stage. Students noted the district's bullying and harassment policy is reviewed with them by administrators at the beginning of the school year; however, students were unable to provide information about an established procedure to follow for reporting when incidences do occur. The high school is encouraged to widely communicate information about the procedure to follow when students experience bullying or harassment. For example, place the full text of the district's bullying and harassment policy, #105, in the high school student handbook and activities handbook and place in a prominent location in each. Ensure all protected categories are listed. Accompany the policy with the Anti-bullying /Harassment Complaint Form with information on where to submit the form. All buildings are encouraged to continue efforts to inform students, staff, and parents of what bullying and harassment mean, as well as cyber-bullying and sexting. The district might contact Cynthia Erickson, at the Iowa Department of Education (Cynthia.erickson@iowa.gov, 515-281-8514), for information about available resources. The district might also consider contacting either Mike Monfils or Mike Peters, Olweus and Positive Behavior and Instructional Support (PBIS) trainers, at Great Prairie AEA.
25. High school students reported taking the lead in seeking help with understanding what they are learning. They reported teachers will help them, but only if they ask for assistance. At-risk students often do not understand this expectation, or hesitate to show their need for assistance. Multiple interview groups mentioned regret that the high school Success Center, a supervised structured program for providing academic support for students, is no longer available. The high school is encouraged to identify strategies that remain in place to ensure academic success of all students. The district is encouraged to identify the ways in which it supports academic success, collect data on the efficacy of the efforts, identify which supports should be continued or discontinued, and determine additional needed supports. Teachers, support staff, and administrators are encouraged to renew commitment to the district belief, "child development and education are the highest priorities for the Keokuk Community School District," and engage in dialogue about what this belief means to the staff: what would it look like, sound like, and feel like when operationalized.
26. High school students reported no Career and Technical Education (CTE) student organizations were available. CTE teachers reported varying reasons for the lack of CTE student organizations: some students are involved in sports, jobs after school, lack transportation, and teachers with full schedules. The CTE programs are encouraged to explore CTE student organizations and seek assistance from Mary Ann Adams, Family and Consumer Sciences Consultant (maryann.adams@iowa.gov, 515-281-4716), Jenny Foster, Business Education

Consultant (jenny.foster@iowa.gov), Catherine Vance, Health Occupations Consultant (Catherine.vance@iowa.gov, 515-281-4722), or Andrew Wermes, Industrial Technology Consultant (Andrew.wermes@iowa.gov, 515-281-8353) for assistance.

27. High school students and parents reported the district provided supports for the transition of students moving from middle school to high school, yet they did not seem aware of the supports in place for students transitioning from high school and preparing for college, vocational training programs, or the workforce. Staff interviews, however, indicated these supports are included as a part of the counseling program. The difference in perceptions should be addressed so that all stakeholders benefit from the services provided. The high school is encouraged to examine the current function of the guidance program at the high school, study the School Counseling Framework provided on the Iowa Department of Education Web site, (http://www.iowa.gov/educate/index.php?option=com_content&task=view&id=716&Itemid=1549), and prioritize connecting with families regarding the guidance program to deliver services aligned with student needs. Additionally, individual and small group counseling opportunities are not available at K-5 and on a limited basis grades 9-12. (Please refer to the Chapter 12 Non-compliance Matrix found at the end of this report.)
28. Document review and interviews with teachers and administrators verified the district does not currently have a K-12 At-Risk plan. Systemic academic, behavioral, or learning support approaches addressing the needs of at-risk students are limited. Additionally, identification criterion, assessment, and service delivery varies from building to building. The district is encouraged to convene a group of K-12 teachers, administrators, parents, and community service providers to develop a K-12 plan inclusive of ongoing educational strategies. Consider contacting Pat Shier (pat.shier@gpaea.k12.ia.us) to coordinate assistance or Susan Walkup, Dropout Prevention Consultant at the Iowa Department of Education (susan.walkup@iowa.gov, 515-281-5718). This was noted in as an area of concern in the district's site visit report in May of 2004. In light of the concern expressed by administrators, teachers, parents, and community members regarding the district's low graduation rate, the visiting team suggests the district consider this a priority.
29. Keokuk CSD is encouraged to consider unique methods for outreach to families who are not traditionally connected to the schools. Sometimes minority parents or non-traditional families are not familiar or comfortable with traditional home and school interactions. The following might enhance these efforts:
- Schedule some opportunities for school/home contact at places other than school facilities, i.e. church fellowship rooms or community buildings
 - Work with community service agencies and the churches to identify opportunities for outreach
 - Provide opportunities to build relationships while parents increase their skills through classes, such as Strengthening Families through Iowa State Extension.
 - Help staff develop sensitivity to the unique needs of a community with a high percentage of families of low socio-economic status (SES).



Curriculum and Instruction

In an improving district/school, curriculum challenges each student to excel, reflects a commitment to equity, and demonstrates an appreciation of diversity. There is an emphasis on principles of high quality instruction and clear expectations for what is taught. Educators have a common understanding of quality teaching and learning. Instruction is designed to accommodate a wide range of learners within the classroom. Teachers have a repertoire of effective strategies such as the following: identifying similarities and differences; summarizing and note taking; reinforcing effort and providing recognition; homework and practice; nonlinguistic representations; cooperative learning; setting objectives and providing feedback; generating and testing hypotheses; and questions, cues, and advance organizers. The staff accepts responsibility for the students' learning of the essential curriculum (e.g., Iowa Core Curriculum). Instructional time is allocated to support student learning. Evidence includes, but is not limited to, the following:

- School and classroom tasks and activities are inherently engaging and relevant.
- Curriculum is aligned with standards, assessments, and policy.
- A shared vision of effective instruction is held by all instructional staff.
- Curriculum and instruction reflect contributions from diverse racial, ethnic, and personal backgrounds.
- Students are provided opportunity and time to learn.
- Teachers are provided with an instructional framework for units that employs research-based strategies for use with diverse learner characteristics.

Noted Strengths:

30. Teachers and high school students noted Transitions, a required course for all 9th grade students. Students complete several career inventories, research a career, develop an application letter and resume, and practice interview questions. Tardiness, school attendance, tattoos, and body piercings are discussed as issues having an impact on employability. Discussions concerning employability skills and habits are included in this course. The course utilizes various materials from the Southern Poverty Law Center and the Holocaust Center.
31. Attendance at Business Horizons, a summer camp for high school students, is offered through the Iowa Banking Association and local businesses. Five to six Keokuk students traditionally participate in this business simulation held at Simpson College. In learning about entrepreneurship, students develop a business plan, market a product, and make a commercial. The high school has been participating in this program over 23 years.
32. For the first time in several years, CTE teachers reviewed program area data reported through Perkins Grant requirements. CTE teachers met with the district's Vocational Advisory Committee to review course enrollment data, identify program area needs, and discuss employability skills needed by students. Equipment donations to the school have resulted from the participation of local business and industry members serving on the Vocational Advisory Committee (e.g., hospital beds for the Health Occupations program).

33. CTE teachers reported the high school has begun offering a Health Occupations program. Through participation in the program, students have the opportunity to gain Certified Nursing Assistant (CAN) certification. Local nursing homes and the hospital are supportive of the program and hold the possibility of employment for students earning CNA certification.
34. Non-instructional support staff and special education teachers reported working together to assist the district in achieving its student learning goals. For example, school nurses attend Individualized Education Program (IEP) meetings and work with the IEP team to address individual student learning needs. The district's food service program provides job training for special needs students, encourages students who might have difficulty obtaining a job outside school by providing opportunities to work in the program. Some students have gone on to full-time employment after leaving the district. Additionally, special education teachers reported students are provided opportunities for application of their learning to real-life experiences. For example, some special needs students attended a recent Civil War re-enactment and talked with re-enactment participants.

Recommendations for Improvement:

35. There is research addressing the power of teacher expectations on student success. It has been noted a culture that believes ALL students can learn, and that it is the responsibility of ALL staff to serve them provides increases in achievement at all levels. The district is encouraged to continue conversations about the need to raise expectations for all students and avoid a culture of finding placement outside of the general classes for individuals who encounter difficulties learning in the traditional classroom setting. The idea of discreet "solutions" (e.g. alternative placement, removal from general education settings for instruction) is not as effective as finding ways to serve students in more general education settings, including preschool. The district is encouraged to establish expectations and provide support for all teachers to increase their understanding of options for trying multiple strategies to help struggling learners. Engaging in the Instructional Decision Making (IDM) model and continuing work with fidelity of Differentiated Instruction could assist the staff in better meeting the needs of all students in classrooms and to avoid jumping too quickly to find a "placement" or out-of-class solutions for struggling learners. Consider contacting Shauna Cutler and Lori Denz at GPAEA for assistance.
36. The middle school course registration handbook and master schedule indicated physical education is gender segregated (i.e. Girls PE, Boys PE). Evidence suggests PE activities are 60% gender segregated and 40% gender integrated. The middle school is encouraged to examine current practices, the intended and unintended consequences of current practices, and implications for equity in programming. Consider contacting Pat Shier at Great Prairie AEA (pat.shier@gpaea.k12.ia.us) for assistance.

37. A review of the draft for the District Developed Service Delivery Plan for Special Education indicates that a wide variety of Co-Teaching Services are included as parts of the continuum of services. Instructional approaches such as One Teach, station teaching, parallel teaching, alternative teaching, and teaming are included within the plan. District special education teachers indicated they have received no formal training for these strategies, nor have regular education teachers received training to implement them in their classrooms. Therefore, it is recommended that the district consider the provision of training to implement the components outlined in the District Plan with fidelity and integrity. The Marilyn Friend training through GPAEA might provide a structure for this work.
38. The district is encouraged to examine the current practices and format of the alternative programming at the junior high and high school levels. The alternative high school program is listed as a "school" in the official DE directory. As such, the alternative school needs to provide all required "offer and teach" courses found at the comprehensive high school. In either case, as a program or school, the staff must meet the requirements for Highly Qualified Teachers with proper academic endorsements. Questions to consider might include: If this is a school, has it established its own identity through graduation, a yearbook, class pictures, a link on district Web site, reporting of achievement data, extra-curricular activities, etc.? If this is a program, are students allowed access to those things within the high school? Susan Walkup at the Iowa Department of Education can be contacted for assistance. Susan.walkup@iowa.gov
39. The high school provided evidence of articulation agreements for the Health Occupations and Industrial Technology programs that are one year in length. The high school is encouraged to begin seeking renewal of these agreements for the 2009-2010 school year and beyond. Investigate the possibility of securing five-year agreements with Southeastern Community College.
40. High school students and the high school Gifted and Talented (G/T) teacher reported identification of G/T students does not regularly occur. Currently the program is understood as the availability of courses offered for dual credit and a few new challenging courses, such as World Geography and American Studies. High school students reported no contact with the G/T teacher and no structure in place for addressing the affective needs of identified G/T students. The district and G/T teacher are encouraged to engage in a thoughtful approach to systemic G/T programming aimed toward improving collaboration among general education teachers and G/T teachers throughout grades K-12. For example, parents reported concerns regarding the content of the elementary program. It was noted that elementary students are transported to the middle school for services. Identified students can be served in the regular classroom with support from both the classroom teacher and the G/T Coordinator/teacher, particularly if adequate planning time and resources are allocated. Consider the following suggestions:
- **Identification:** The district is encouraged to review and/or revise the G/T identification process district-wide. Additionally, consider multiple ways to communicate information about the identification procedure to all students, teachers, and parents.

- **Differentiated Program:** General education and G/T teachers are encouraged to learn more about differentiated instruction, various forms of tiered teaching, acceleration, curriculum compacting, and other appropriate accommodations that involve the collaborative efforts of G/T teachers, classroom teachers, parents, and students. Such efforts may also result in secondary students experiencing greater relevancy in G/T opportunities aligned more seamlessly into their academic schedule. Several options could be beneficial, including the following:
 - Place all identified G/T students in grades 9-12 in the same Homeroom with the G/T teacher. This would provide a planned approach to meeting both the cognitive and affective needs of G/T students. Planned Homeroom curriculum could be tailored for G/T students.
 - Allocate planned, scheduled time for the G/T teacher to collaborate with general education teachers on ways to meet the needs of G/T students in the regular classroom.
 - Establish a district-wide G/T parent advisory to provide an opportunity for learning, input, and feedback to support the growth of G/T students.
- **Inservice:** Through scheduled G/T inservice for K-12 teachers, focus on integrating differentiation and instructional strategies on how to meet the specific needs of G/T students in the regular education classroom.
- **Program evaluation:** Create a team of administrators, teachers, and students to complete a gifted program self-evaluation. Heartland AEA has developed a gifted program self-evaluation that aligns with Chapter 12 General Accreditation Standards. Contact Sandy Morrison at Great Prairie AEA to coordinate assistance in obtaining a hard copy or online access to this document.

The district is urged to move promptly toward compliance with requirements for G/T programming as noted in the Chapter 12 Non-compliance Matrix found at the end of this report, particularly as aspects of G/T programming were noted as a concern and as an area of non-compliance in the district's last comprehensive site visit report, May 2004.

41. Multiple interview groups reported concern about the rigor of some of the district's content area programs. Some reported students are not prepared well enough in mathematics, science, or industrial technology as they move to post-secondary options. Some interviewees also expressed the sentiment that academic mediocrity is acceptable. They noted Advanced Placement (AP) classes are no longer offered, although many high school students do enroll in online and concurrent enrollment courses. They also noted attention to the preparation of students going into the workforce after high school is needed. As part of the district's ongoing partnership with the Keokuk Economic Development group, Vocational Advisory Committee, School Improvement Advisory Committee and others, the district is encouraged to engage all stakeholders in a multi-faceted approach focused on preparing students for college, vocational training, and workforce. Utilize the viable entry points for these groups to engage with the district in learning about and planning for the incorporation of the Iowa Core Curriculum. Study how and in what ways the Iowa Core Curriculum can propel the district and the community into a bright economic future.

42. Although it was evident the district curriculum includes career development, global education, and multi-cultural/gender fair (MC/GF) strategies throughout grade levels, it does not appear these activities are consistently recorded in district standards and benchmarks documents. Consider reviewing the curriculum matrix to ensure career education, global education and MC/GF activities are accurately recorded and implemented intentionally.
43. The library collections at four district buildings (i.e., high school, middle school, Washington, and Wells-Carey) have average publication ages older than 1993. These are also schools with the highest percentage of non-proficient readers based on results of the 2007-2008 Iowa Tests of Basic Skills (ITBS) and Iowa Tests of Educational Development (ITED). Review of resource allocations for library materials for these buildings may not align with demonstrated need. The district is encouraged to ensure it is implementing a library program that is regularly reviewed, revised, and designed to provide methods to improve library collections to meet student and staff needs, connections with parents and the community, support the district's school improvement plan, access to or support for professional development for the teacher librarian, current technology and electronic resources, current and diverse collection of fiction and non-fiction materials in a variety of formats, and a plan for annually updating and replacing library materials, supports, and equipment. Consider contacting Kristen Steingraeber, Media Specialist at Great Prairie AEA (ksteingraeber@gpaea.k12.ia.us), for assistance.

Professional Development

In an improving district/school, staff is qualified for assignments and engages in ongoing learning opportunities to improve effectiveness. Student achievement and other sources of data are used to set goals for professional development. The district provides professional learning opportunities that include theory, demonstration, practice, and coaching. Evidence includes, but is not limited to, the following:

- Focus is determined through the analysis of student achievement and performance data.
- Professional development is focused and based on research-based strategies.
- Professional development sessions build on one another and are distributed throughout the school year.
- Time is provided for teachers to apply new content and pedagogical knowledge.
- Time for instructional staff to collaborate regarding implementation is provided.
- Professional development is sustained over time.
- An established system provides support to monitor and evaluate implementation of professional development and its impact on student learning.
- Formative student data and teacher implementation data are used to adjust professional development and guide instructional decisions.
- All school staff members, instructional and non-instructional, are provided professional development to support job roles and functions.
- Professional development activities contribute to the capacity of all school staff to develop cultural competence and to reflect and respect diversity in classroom and work environments.

Noted Strengths:

44. Multiple interview groups reported the district commitment to provide time and resources for professional development, including approving requests to attend training or workshops outside of the district. Grant monies and Perkins funds have allowed teachers at all levels opportunities to attend regional and national professional development offerings. Staff reported appreciation for the ability to attend these training sessions. Recent professional development efforts mentioned included the following:
- Teaching strategies that support co-teaching
 - Differentiated Instruction
 - Understanding by Design (UbD)
 - CTE state and regional conferences
 - Every Child Reads

Recommendations for Improvement:

45. Multiple interviews indicated an overall structure for planning, implementing, and evaluating professional development is not in place. District documents demonstrated a team for Understanding by Design (UbD) and a cadre for Reading for Understanding which operate independently. The district is encouraged to continue with its effort to bring greater focus to professional development by establishing a district-wide committee beyond the district's Teacher Quality Committee. When establishing this committee, consider the following:

- Clearly define the role of the committee and its responsibility in the planning, development, implementation, and evaluation of professional development focused on raising the achievement of all students in each building in the Keokuk CSD. Set expectations that each and every teacher has responsibility for each and every student no matter which school the student attends. Also, set expectations that there are no excuses for students failing to improve.
- Utilize the committee to identify data sources and develop processes that will involve all leaders and educators responsible for instruction in the analysis of academic and non-academic data to determine the focus of professional development efforts at the district and building levels.
- Develop a consistent process for the review of research-based strategies that can be used by the committee and representatives from all building teams in identifying and aligning the focus of district/building professional development efforts.
- Utilize the committee in the following ways:
 - Planning ongoing training at the district or building level following the Iowa Professional Development Model
 - Develop advocacy with the school board for recommending needed amounts of time for professional development
 - Developing a plan for supporting implementation with fidelity
 - Determining how implementation will be monitored and documented
 - Identifying the formative measures that will inform the change process
 - Planning collaborative work at the building/grade levels to support the implementation of new learning
 - Analyzing implementation data formatively and summatively to make ongoing adjustments in professional development efforts
 - Making decisions about additional professional development needs beyond the focus of the District Professional Development Plan
 - Making decisions about professional development needs as the current focus of professional development results in 75% of staff routinely using the strategies and determining that student achievement has increased

While the above suggestions apply to a district-wide professional development committee, the essential points could be replicated at the building level. Designing a long term plan for professional development at the district and building levels can result in distributing leadership and developing ownership in a relevant way throughout the system. For technical assistance on planning professional development and support structures, consider contacting Katie Gavin (katie.gavin@gpaea.k12.ia.us or 319-753-6561 ext.1267), Professional Development Coordinator at Great Prairie AEA, for assistance

46. Currently, the district's Teacher Quality Committee (TQC) engages in the planning and implementation of professional development. The legislated responsibility of a district Teacher Quality Committee is focused on the allocation of resources to support professional development. The district is encouraged to consider the benefit of the establishment of a district-wide professional development committee (supported by professional development committees at each school) separate from the TQC. This structure would allow the TQC to focus on the allocation of resources to support professional development while the district professional development

committee concentrates on the planning, implementation, monitoring, and evaluation of district and building professional development.

47. Administrators and teachers reported staff are provided multiple opportunities to attend state and national conferences. While teachers reported appreciation and were enthusiastic about these opportunities, it is essential the district ensures these opportunities are closely aligned with building, district and individual teacher professional development plan goals. Consider the following questions:
- What process is in place to ensure participation in these training opportunities support the District Professional Development Plan and teachers' Individual Career Development Plans?
 - What process is in place to make certain individual training activities are based on research-based strategies or information?
 - What opportunities are there for teachers to practice strategies they are learning and to receive feedback and coaching for these strategies?
 - How do teachers document the implementation and analysis of these strategies?
 - How does the District Professional Development Team ensure research-based strategies are implemented with fidelity? How does the District Professional Development Team ensure these trainings result in increased student achievement?
 - How can the district's financial resources be used most effectively to implement the IPDM and address areas of concern based on data?
48. The district is encouraged to expand data analysis to examine the effect current professional development is having on student achievement and building culture. Implementation logs could help gather data, and could be used to monitor both frequency of implementation and fidelity to the instructional models being used. As a next step, the district could explore the relationship between implementation of instructional strategies and achievement scores/trend lines. These data could then support future professional development plans.

Monitoring and Accountability

In an improving district/school, the district/school establishes a comprehensive system that monitors and documents performance of student progress, curriculum, instruction, programs, and initiatives. Results from assessments drive the goal setting and decision-making processes. Leadership supports a system that regularly analyzes student performance and program effectiveness. Instructional decision-making utilizes a process of collecting, analyzing, and summarizing data. Evidence includes, but is not limited to, the following:

- A system for district-wide student assessments, including multiple measures that are valid and reliable, is implemented.
- Decision-making for the continuous improvement of instruction and student learning using student achievement and teacher implementation data is employed.
- The district's/school's cycle of program evaluation as noted in its CSIP is implemented.
- An established evaluation system for the professional growth of all district/school staff is implemented.
- Summative evaluation processes are used to determine whether professional development has resulted in improved student learning.

Noted Strengths:

49. Data from the 2007-08 Annual Progress Report indicates Keokuk CSD students scoring proficient or above on the Iowa Tests of Basic Skills (ITBS) and Iowa Tests of Educational Development (ITED) were above the state averages in the following areas.

	Keokuk CSD	GPAEA	State Averages
4 th Grade Reading	85.29%	78.22%	76.7%
4 th Grade Math	81.61%	78.84%	79.03%
5 th Grade Reading	77.25%	75.77%	76.32%
5 th Grade Science	82.63%	81.58%	82.02%

These data reflect the 2007-08 school year and include all students tested as compared to statewide rolling biennium averages.

50. Principals and teachers spoke of using data to monitor the following:

- Discipline incidents
- Freshman course failure, leading to the development of freshman academy
- Student placement in courses
- Title I and Reading Recovery
- ITBS and ITED student achievement

Recommendations for Improvement:

51. Data from the 2007-08 Annual Progress Report indicates Keokuk CSD students scoring proficient or above on the Iowa Tests of Basic Skills (ITBS) and Iowa Tests

of Educational Development (ITED) were below the state averages in the following areas:

	Keokuk CSD	GPAEA	State Averages
3 rd Grade Math	73.93%	76.12%	75.03%
3 rd Grade Science	77.6%	79.71%	78.35%
4 th Grade Science	81.62%	85.12%	83.5%
5 th Grade Math	70.06%	76.75%	79.39%
6 th Grade Reading	59.51%	65.17%	68.29%
6 th Grade Math	68.52%	72.08%	76.26%
6 th Grade Science	71.61%	79.27%	79.56%
7 th Grade Reading	63.93%	67.55%	69.55%
7 th Grade Math	69.23%	74.26%	75.7%
7 th Grade Science	74.52%	78.71%	79.86%
8 th Grade Reading	61.14%	69.38%	70.4%
8 th Grade Math	62.07%	72.69%	74.44%
8 th Grade Science	69.14%	78.53%	79.17%
11 th Grade Reading	59.63%	71.72%	76.45%
11 th Grade Math	60.12%	72.66%	76.82%
11 th Grade Science	66.05%	78.03%	79.91%

These data reflect the 2007-08 school year and include all students tested as compared to statewide rolling biennium averages.

These data are particularly significant as the May 2004 report also stated district reading and math achievement scores on ITBS/ITED were below state averages. Further analysis indicates significant achievement gaps between various subgroups. In the 2004 report, the district was encouraged to continue examining data in a variety of ways. As the district proceeds with the "KCSD End Game" goals, it is encouraged to examine procedures for data review and analysis, with attention to the following:

- Provide training in the purpose and use of specific assessments, how to accurately interpret results (i.e., formative and summative), and use these data to guide daily instruction.
 - Regularly review and analyze multiple data points.
 - Use data analysis to determine the selection of specific, research-based targets for professional development.
 - Use data analysis to determine needed instructional strategies.
 - Use student achievement data and teacher implementation data to determine the extent to which instructional strategies and professional development are impacting student achievement.
 - Discuss achievement gaps between SES and IEP subgroups
- Consider contacting Evan McCormick at GPAEA for assistance in data analysis.

52. Interviews did not address a consistent protocol being used to analyze student achievement and school-wide data. As a "next step" in utilizing data, Keokuk CSD is encouraged to develop a consistent format for analyzing data and establishing the connection to the school goals and the comprehensive School Improvement Plan (CSIP). The following questions might be considered:

- What do these data mean?
- What do these data tell us about students' achievement?
- What students are not being reached in our classes?
- What are the reasons these students are not achieving at higher levels?
- What changes need to be made to correct gaps and low scoring?
- What will I (teacher) do in my classes to reach students?

After teachers have considered these questions, a next step might be to begin to ask deeper questions, i.e. using the "Five Whys" from Root Cause Analysis by Preuss. Consider contacting Evan McCormick at GPAEA for assistance.

53. Limited evidence of program evaluation demonstrating the impact of programs and initiatives on student learning and student success was found. Administrators and instructional staff are encouraged to establish procedures and practices to develop and use program evaluation, particularly in special education, professional development, At-Risk, school counseling program, school library program, Character Counts, and the G/T program. Consider setting clear program goals that answer the question, "What do we want as a result of this program, initiative, or support service?" Identify clear, aligned measurable goals. Establish a process and procedure to follow in monitoring progress (formative) and evaluating program impact (summative). Based on results, determine which program elements to sustain and which program elements to abandon. Contact Evan McCormick at Great Prairie AEA to coordinate assistance.

54. A review of documents did not verify building administrators' development of individual growth plans. Administrators' individual growth plans should be developed to guide the work of each principal in continuous improvement and reviewed annually with the evaluator. Please refer to the Chapter 12 Non-compliance Matrix found at the end of this report. Additionally, teachers' individual professional development plans did not demonstrate the plans were reviewed annually by the teacher and their evaluator. The plans did indicate a starting data and an implementation date for the plan; however, the teacher's name was not found on most individual professional development plans reviewed. The district is encouraged to review its evaluation policies and procedures for administrator and teacher evaluation and ensure such details are followed.

55. The visiting team suggests a review of the previous site visit report from 2004 to note the areas where progress has been made, and also to note areas that remain as concerns in the 2009 report. Perhaps the SIAC, board, and leadership teams could include this as an activity as the district plans for the future.

56. Documentation provided by the district indicated current year attendance center and course enrollment data have not been consistently collected and reviewed. The district is encouraged to further formalize the process used to review these data. Information gleaned over time could be helpful in identifying enrollment patterns of

non-proficient students, monitoring progress on reducing gender segregated courses, and providing a means to determine the relative contribution of course completion on assessment scores (e.g., the impact of completing certain courses on students' ACT scores) or course enrollment on graduation. Sharing results of the review with teaching staff, SIAC, and other relevant groups to aid in instructional and systemic decisions is also recommended.

Keokuk Community School District's Compliance Status in Applicable Federal Programs:

Title IIA (Teacher and Principal Training and Recruiting Fund)

The district has no citations of Title IIA non-compliance identified during this visit.

Title IID (Enhancing Education through Technology, E2T2)

The district has no citations of Title IID non-compliance identified during this visit.

Title III (English Language Learners)

The district has no citations of Title III non-compliance identified during this visit.

Title IVA (Safe and Drug Free Schools)

The district has no citations of Title IVA (SDFSC) non-compliance identified during this visit.

Title V (Innovative Programs)

The school district has no citations of Title V non-compliance identified during this visit.

Title XC (Education of Homeless Children and Youth)

The district has no citations of Title XC non-compliance identified during this visit.

Areas of Non-Compliance

The Keokuk Community School District shall submit a plan of correction for each non-compliance item listed below to the Site Visit Team Leader within 45 business days of the receipt of this report. Evidence of corrective action for non-compliance(s) may be submitted with the plan or at a later date in accordance with the noted timeline. The district may choose to use the following matrix as a format for the development of an action plan or develop its own.

Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
EQ4. Data regarding district, attendance center, and course enrollment on the basis of gender, disability, race, and/or national origin do not exist for all subgroups. 281— IAC 12.1(1)	No three-year trend data No system for data collection Not all building data represented		
BH1. Policy on harassment, bullying, and hazing of or by students and staff and volunteers on the basis of age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or family status 281— <i>IAC 12.3(13), Title IX, Section 106.31, and Code of Iowa, Chapter 729A.1, and SF 61</i>	Policies do not include all protected traits or characteristics. (Policies 410.4 and 502.11)		
GT5. The district has no differentiated program for identified gifted and talented students. 281— IAC 12.5(12)	No evidence provided of addressing affective needs of students K-12.		

Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>PE8. No evidence exists for the annual evaluation of administrators. 281—IAC 12.3(3) and Iowa Code 279. 23A</p>	<p>No evidence provided the administrator's evaluator meets annually with the administrator to review progress on the administrator's professional development plan or assess the goals of the individual administrator's professional development plan.</p>		
<p>SCP3. The district counseling program is not regularly reviewed and revised. 281-IAC 12.3(11)</p> <p>SCP4. The district counseling program is not designed to provide curriculum that is embedded throughout the district's overall curriculum. 281-IAC 12.3(11)</p> <p>SCP5. The district counseling program is not designed to provide individual student planning designed to help students establish educational and career goals. 281-IAC 12.3(11)</p> <p>SCP6. The district counseling program is not designed to provide responsive services through intervention and curriculum that meet students' immediate and future needs. 281-IAC 12.3(11)</p>	<p>No evidence provided for K-5 counseling program</p>		

Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>SCP7. The district counseling program is not designed to provide management activities that establish, maintain, and enhance the total school counseling program. 281-IAC 12.3(11)</p>			
<p>LP3. The district library program is not regularly reviewed and revised and designed. 281—IAC 12.3(12)</p> <p>LP3.1. The district library program is not designed to provide methods to improve library collections to meet student and staff needs. 281—IAC 12.3(12)</p> <p>LP3.2. The district library program is not designed to provide connections with parents and the community. 281—IAC 12.3(12)</p> <p>LP3.3. The district library program is not designed to provide support for the district's school improvement plan. 281—IAC 12.3(12)</p> <p>LP3.4. The district library program is not designed to provide access to or support for professional development for the teacher librarian. 281—IAC 12.3(12)</p>	<p>No evidence provided of a library plan</p>		

Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>LP3.5. The district library program is not designed to provide current technology and electronic resources. 281—IAC 12.3(12)</p>			
<p>LP3.6. The district library program is not designed to provide current and diverse collection of fiction and nonfiction materials in a variety of formats. 281—IAC 12.3(12)</p>			
<p>LP3.7. The district library program is not designed to provide a plan for annually updating and replacing library materials, supports, and equipment. 281—IAC 12.3(12)</p>			
<p>HSPH2. The health program for grades 9-12 does not contain one unit. 281—IAC 12.5(5)(e)</p>			

Areas of Non-Compliance

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>EQD1. The district does not have a policy on non-discrimination in employment on the basis of race, color, national origin, gender, disability, religion, creed, marital status, sexual orientation, and gender identity (EQD1). Title IX 34CFR 106.9 Section 504 34 CFR 104.8 and Iowa Code 216.6</p>	<p>Not all protected classes included in board policy.</p>	<p>Regarding "marital status:" This is not required by DE monitoring, but the District should note that the Office of Civil Rights (OCR) or another agency could cite the District as noncompliant.</p>	
<p>EQD3. The district does not have a nondiscrimination notification in major written publications: Parent, student, employee handbooks, Registration handbook, Coaches handbooks, Brochures about the district, Web site, and School newsletters Section 504 34 CFR 104.8 Title IX 34 CFR 106.9, OCR Guidelines IV.O and V.C.</p>	<p>The district's policy statements on non-discrimination do not consistently include all required protected classes.</p>		

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
EQD4. The district does not have a Plan that addresses equal employment opportunity and affirmative action in employment. Iowa Code 19B.11, 281—IAC Chapter 95	District policy provided; no evidence provided of EEO plan		
T4A1. A crisis management plan and security procedures for the time when students are at school and on their way to and from school do not exist. Title IV-A, NCLBA Sec. 4114(d)(7)(B) and Title IV-A, NCLBA Sec. 4114(d)(7)(D)	No evidence provided of procedures for the time when students are on their way to and from school.		