

## Areas of Non-Compliance: Chapter 12

The Colo-Nesco 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
<p>1. School Calendar:</p> <ul style="list-style-type: none"> <li>• CL5 The number of instructional days provided by the school district is less than 180. No approved “innovative calendar” waiver was granted. 281 – IAC 12.1(7)</li> <li>• CL8 Graduating seniors are being released more than five days early, excluding weather related extensions. 281 – IAC 12.1(7)</li> <li>• MD1 The school district does not meet the requirement of 5.5 instructional hours in a school day. 281 – IAC 12.1(9)</li> </ul>	<p><b>Feedback:</b></p> <ul style="list-style-type: none"> <li>• Because of the irregularities in the school calendar, the district is not providing 180 days of instruction. For example, the 2010-2011 school calendar notes 2:00 p.m. early dismissals the day before a holiday: 11/24/10 and 12/22/10. An early dismissal at 2:00 p.m. is also scheduled the day before spring break. Early dismissal without scheduled inservice and with fewer than 5.5 hours of instruction on that day (day before a holiday) is not permitted. In view of this, seniors will not have at least 175 days of attendance.</li> </ul> <p><b>Evidence Needed:</b> Please provide the 2011-2012 school calendar demonstrating 180 days of instruction with appropriate instructional time on days students are dismissed early and note the last day for seniors. Additionally, submit school board</p>		<p>May 1, 2011</p> <p style="color: red;">Approved June 21, 2011</p>

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	meeting minutes denoting the board's approval of the school calendar.		
<p>2. Teacher Evaluation:</p> <ul style="list-style-type: none"> <li>EV1 and EV2 Evaluation criteria and evaluation procedures for teachers do not exist. 281 – 12.3(3), Iowa Code 279.14, Iowa Code 279.23A</li> </ul>	<p><b>Feedback:</b> Policies 405.8 and 411.7 are more than five years old.</p> <p><b>Evidence Needed:</b> Please submit reviewed/revise/ approved policies (405.8 and 411.7). Also, submit a copy of the school board meeting minutes noting the board's approval of said policies.</p>		<p>April 1, 2011</p> <p>Approved June 21, 2011</p>
<p>3. Administrator Evaluation:</p> <ul style="list-style-type: none"> <li>PE8 The school district does not implement its evaluation procedures for all administrators. 281 – IAC 12.2(3) and Iowa Code 279.23A</li> </ul>	<p><b>Feedback:</b> Individual administrator professional development plans are not developed or used to review progress by the administrator and the administrator's evaluator.</p> <p>The superintendent reported he passes his goals on to building administrators and each shares in the superintendent's goals. This practice does not constitute an individual professional development plan for each administrator.</p> <p><b>Evidence:</b> Submit individual professional development plans for each administrator for the 2010-2011 school year. The plans' use for review of progress for each administrator will be monitored by the DE each year until the district's next site visit.</p>		<p>April 1, 2011 (plans)</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Use of administrators' individual professional development plan)</p> <p>Status as of 6/21/11: One remaining principal developed an individual administrator</p>

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			<p>professional development plan. The plan was reviewed and dialogue held during the 2010-2011 school year. Recommendation: in the succeeding years ensure the superintendent and principal both sign and date the feedback documented from the conversation. During the 2011-2012 school year the superintendent will continue this practice with the junior/senior high and elementary principals. This will be reviewed June, 2012.</p>
<p>4. Career and Technical Education</p> <ul style="list-style-type: none"> <li>• VED5 The district does not have an</li> </ul>	<p>Feedback:</p> <ul style="list-style-type: none"> <li>• Articulation agreements were verified for Family and Consumer Sciences (FCS) and Industrial Technology and for the Career Academy. The</li> </ul>		<p>July 1, 2011</p> <p>Ongoing, by June 20 annually until the district's next</p>

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<p>articulation agreement for each of its four vocational (CTE) service areas either directly with a post-secondary program or through a sharing agreement with another district. 281 – IAC 12.5(5)(i)</p> <ul style="list-style-type: none"> <li>VED7 An advisory committee that assists in vocational education (CTE) planning and evaluation exists; however, there is no evidence that the committee fulfills its responsibilities. 281 – IAC 12.5(5)(i)</li> <li>VED9 No evidence exists that the district has made an effort to seek committee representation from the community it represents (e.g., by gender/race/ethnicity) to assist in vocational education (CTE) and planning and evaluation. 281</li> </ul>	<p>Agriculture Education program is offered and taught on-site, yet no articulation agreement was able to be verified.</p> <ul style="list-style-type: none"> <li>Only advisories for FCS and Agriculture could be verified. Des Moines Area Community College (DMACC) is taking the lead on implementing a Career Academy Advisory but the committee has not yet met.</li> </ul> <p>The documentation did not verify the advisories assist with both planning and evaluating the CTE program areas.</p> <p>No documentation for a Business Advisory was provided.</p> <ul style="list-style-type: none"> <li>No evidence was provided for the FCS, Business, Agriculture or Career Academy advisories to verify the membership of the following: gender balance and race/ethnicity representation. The district must document its efforts to recruit the required representation.</li> </ul> <p><b>Evidence Needed:</b> Provide evidence through the remaining 2010-2011 CTE Advisory (SIAC) minutes that the CTE program area advisories actively engaged in planning and</p>		<p>site visit. (Review of CTE Advisory membership lists and meeting minutes)</p> <p>Status as of 6/21/11: Ag Articulation Agreement is not signed and dated. Jim Verlengia will fax when ready.</p> <p>Work needs to continue to determine if the district will form its own Business and Industrial Tech Advisory Committees or fulfill the requirement through DMACC.</p> <p>Follow up on CTE Advisories and Advisory membership lists in June, 2012. Must be in place and functioning at</p>

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<ul style="list-style-type: none"> <li>- IAC 12.5(5)(i)</li> </ul>	<p>evaluating the district's CTE programs. If some program area advisories are through the Story County Consortium or DMACC, the district must secure and provide a copy of the consortium membership lists and meeting minutes.</p>		<p>that time.</p>
<p>5. Gifted and Talented:</p> <ul style="list-style-type: none"> <li>• G/T 5 The district has not qualitatively differentiated program for identified gifted and talented students. 281 – IAC 12.5(12)</li> <li>• G/T 7 The district does not provide any professional development with regard to gifted and talented programming. 281 – IAC 12.5(12)</li> </ul>	<p><b>Feedback:</b> A qualitatively differentiated program for grades K-4 and 9-12 could not be verified. Additionally, specific professional development focused on the academic and affective needs of gifted and talented students could not be verified.</p> <p><b>Evidence Needed:</b> Please provide a plan for G/T programming in grades K-4 and 9-12 noting data used to differentiate instruction for G/T identified students in grades K-4 and noting the scheduled contact time for 9-12 students with the G/T teacher and/or scheduled time for the K-4 and 9-12 G/T teacher to plan collaboratively with classroom teachers regarding instruction for G/T students. Please provide documentation of G/T focused professional development regarding the cognitive and affective needs of G/T students for all teachers.</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Review of differentiated program for K-4 and 9-12 and review of G/T professional development for all staff)</p> <p>Status as of 6/21/11: The district G/T committee will be attending the AEA's G/T Academy. A differentiated program will be provided in incremental stages over the</p>

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			<p>next three years, along with G/T inservice for all district staff. Full implementation is expected 2014-2015 school year. Significant progress will be expected each year until then. G/T progress will be reviewed each year in June.</p>
<p>6. At-Risk</p> <ul style="list-style-type: none"> <li>AR1 The district's identification procedures are not designed to potentially identify at-risk students throughout the school age population. 281 – IAC 12.5(13)</li> </ul>	<p><b>Feedback:</b> While documentation indicated criteria for identifying at-risk students, the procedures for implementation could not be verified.</p> <p><b>Evidence Needed:</b> Please submit documentation regarding the procedures to identify at-risk students throughout the school age population by grade level. Additionally, provide verification that all staff have received training to understand each staff person's role and responsibility in implementing the identification procedures and criteria.</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Review of At-Risk identification criteria and procedures for implementing the criteria and annual training of staff)</p> <p>Status as of 6/21/11: District staff will be meeting with Sue Schirmer</p>

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			<p>during the 2011-2012 school year. The documentation of the district's At-Risk plan, including identification procedures and criteria, will be completed during the 2011-2012 school year and reviewed in June, 2012.</p>
<p>7. School Improvement Advisory Committee</p> <ul style="list-style-type: none"> <li>• SIAC5 No evidence exists that the School Improvement Advisory Committee makes annual recommendations to the board about major educational needs; student learning goals; long range goals, including the state indicators that address reading, mathematics, and science</li> </ul>	<p><b>Feedback:</b> The SIAC has not yet submitted recommendation to the school board for the 2010-2011 school year.</p> <p>The district provided a list of SIAC members; however, the list omitted indication of the required representation for the purposes of verification (race, gender, national origin, and disability; students, parents).</p> <p>The SIAC representation presented for board approval did not include students.</p> <p><b>Evidence Needed:</b> Please submit the SIAC's 2010-2011 recommendations and a copy of the board meeting minutes noting the</p>		<p>April 1, 2011</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Review of annual recommendations and district efforts to recruit the required representation on the SIAC)</p> <p>Status as of 6/21/11: The district's SIAC will be meeting 9/26/11</p>

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<p>achievement; and harassment or bullying prevention goals, programs, training, and other initiatives. 281 – IAC 12.8(1)(a)(2)</p> <ul style="list-style-type: none"> <li>• SIAC6 No evidence exists that the district, to the extent possible, has made an effort to seek the required representation (student) balanced representation of race, gender, national origin, and disability for the School Improvement Advisory Committee. 281 – IAC 12.2(2)</li> </ul>	<p>board's receipt of the recommendations. Also, submit a list of the SIAC membership noting representation: students, parents, teachers, administrators, and representatives from the local community, as well as race, gender, national origin, and disability. If such representation is not present, document the district's efforts to recruit such representation.</p>		<p>to finalize recommendations to the board for 2011-2012. Jim Verlengia will forward this.</p> <p>All required constituencies are represented on the SIAC. SIAC 6 approved 6/23/11</p>
<p>8. HSFL2 The foreign language program for grades 9-12 does not contain at least four sequential units. 281 – IAC 12.5(5)(g)</p>	<p><b>Feedback:</b> The high school does not teach Spanish IV. While the district offered the class and no students enrolled, the district of required to offer and teach four sequential units of a foreign language.</p> <p><b>Evidence Needed:</b> The high school must submit a Waiver from Chapter 12 for Spanish IV for the 2010-2011 school year.</p>		<p>April 1, 2010</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Review the 2010-2011 Foreign Language Waiver and subsequent waivers until Spanish IV is</p>

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			<p>offered and taught)</p> <p>Status as of 6/21/11:  Waiver for Spanish IV for the 2010-2011 school year was approved by the DE.  The district is currently determining the master schedule for the 2011-2012. When that is determined, the superintendent will forward either a Foreign Language Waiver Request for 2011-2012 or the high school course descriptor handbook, the master schedule, and the enrollment for Spanish III and Spanish IV.</p>
9. EQ5 No evidence exists to indicate the	<b>Feedback:</b> Policy 102 includes reference to all the		April 1, 2011

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<p>school district provides equal opportunity to participate in programs by gender, sexual orientation, gender identity, marital status, socioeconomic status, disability, race, national origin, color, religion, and creed. 281 – IAC 12.1(1)</p>	<p>required protected classes; however, policy #500 omits reference to sexual orientation, gender identity, socioeconomic status, and creed. Additionally, policy 500 is out of date.</p> <p><b>Evidence Needed:</b> Please submit revised policy 500 and school board meeting minutes noting the board's approval of the revised policy.</p>		<p>Status as of 6/21/11: Revised policy #500 has been presented to the school board and will be approved. When that has been completed, Jim Verlengia will forward a copy of the revised policy and the board meeting minutes to the DE.</p>
<p>10. EQ4 Data regarding district, attendance center, and course enrollment on the basis of gender, disability, race, and/or national origin do not exist for each subgroup. 281 – IAC 12.1(1)</p>	<p><b>Feedback:</b> The district could not provide district, attendance center, and course enrollment data disaggregated by disability, race, and or national origin, particularly at the high school level. The district must use such data to take affirmative steps to integrate students, particularly at the high school level when there are multiple sections of a course.</p> <p><b>Evidence Needed:</b> The high school principal produced the disaggregated student data from JMC by the end of the visits; however, please provide district, attendance center, and course enrollment data and a description</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Review disaggregated student data.)</p> <p>Status as of 6/21/11: The review of enrollment data is in progress and not yet completed for the 2011-2012 school year. A</p>

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	of how the district will use these data to integrate students in the 2011-2012 school year and beyond.		summary of findings and how this impacted enrollment in classes will be forwarded. This will be reviewed each year until the next site visit.
11. PM3 The school district cannot demonstrate that the board has reviewed its policies on at least a five-year cycle. 281 – IAC 12.3(2)	<p><b>Feedback:</b> Board policy series 200, 400, and 500 were out of date.</p> <p><b>Evidence Needed:</b> Please provide copies of board meeting minutes noting the board’s approval of the aforementioned policy series.</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until the district’s next site visit. (The district’s cycle of board policy revision will be monitored to ensure all board policy series are no older than five years.)</p> <p>Status as of 6/21/11: A signed and dated five-year cycle for board policy review was submitted by the district’s Interim Superintendent,</p>

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			<p>Jim Verlengia. Annual review of Series review will be conducted until the district's next site visit.</p>
<p>12. School Counseling Program</p> <ul style="list-style-type: none"> <li>• SCP5 No evidence exists that the school counseling program is regularly reviewed, revised, and designed to provide curriculum that is embedded throughout the district's overall curriculum. 281 – IAC 12.3(11)(b)(1)</li> <li>• SCP8 No evidence exists that the school counseling program is regularly reviewed, revised, and designed to provide systemic support through management activities that establish, maintain,</li> </ul>	<p><b>Feedback:</b> Documentation provided evidence of activities; however, the documentation was not found to be reflective of an embedded curriculum that is delivered by a licensed school guidance counselor. Additionally, no evidence was available that the school counseling program is regularly reviewed, revised, and designed to provide system support through management activities that establish, maintain, and enhance the total school counseling program. For example, there was no evidence of data being collected or used to determine the effectiveness of activities. No plan has been documented for providing responsive services to meet students' immediate and future needs by a licensed counselor, or a plan for how individual counseling is provided, when needed, by a licensed counselor.</p> <p><b>Evidence Needed:</b> Provide evidence that licensed school counselor has completed documentation of an embedded school counseling</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until the district's next site visit. (Regular review of the program and monitoring to ensure the program is delivered by a licensed school guidance counselor.)</p> <p>Status of 6/21/11: The district has hired a K-12 counselor. Once the employee commences work, a plan will be developed to address the school counseling non-compliances.</p>

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and enhance the total school counseling program. 281 – IAC 12.3(11)(b)(4)	curriculum that addresses all program requirements, as well as plan for the regular review, revision, design, and management of the program. Consider contacting the district's Partnership Director from Heartland AEA to coordinate assistance from the AEA's school counseling consultant.		This individual will be meeting with an AEA 11 consultant, participate in the Heartland AEA School Counselor Academy and develop a full, inclusive curriculum. The school counseling program will be fully implemented starting in the 2012-2013 school year. Progress will be reviewed annually until the district's next site visit.
13. School Library Program <ul style="list-style-type: none"> <li>• LP9 No evidence exists that the school library program is regularly reviewed , revised, and designed to provide current and diverse collection of fiction, and nonfiction materials.</li> </ul>	<b>Feedback:</b> No evidence of a plan or a plan being implemented to maintain a current collection of library materials and equipment was provided. For example, library materials are outdated, it could not be confirmed that the teacher librarian has opportunities to seek input from curriculum committees regarding needed library materials, or that funds to purchase materials and equipment are provided beyond money generated		August 15, 2011  Ongoing, by June 20 annually until the district's next site visit.  Status as of 6/21/11: The school library plan is in progress and will be fully

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<p>281 – IAC 12.3(12)(b)(6)</p> <ul style="list-style-type: none"> <li>• LP10 No evidence exists that the school library program is regularly reviewed, revised, and designed to provide a plan for annually updating and replacing library materials, supports, and equipment. 281 – IAC 12.3(12)(b)(7)</li> </ul>	<p>through book fairs.</p> <p><b>Evidence Needed:</b> Provide the district’s plan for regularly reviewing, revising, and designing the school library program with attention to the following:</p> <ul style="list-style-type: none"> <li>• How the licensed teacher librarian will serve as a member of the instructional team for each attendance center</li> <li>• The plan for the regular review, revision, and design of the school library program to provide methods to improve library collections; make connections with parents; support the district’s school improvement plan; provide access to or support for professional development for the teacher librarian; provide current technology and electronic resources; provide a current and diverse collection of fiction and non-fiction materials; and provide for annually updating and replacing library materials, supports and equipment. Contact the district’s Partnership Director at Heartland AEA to coordinate assistance with Michele Richardson.</li> </ul>		<p>developed and implemented by 2015-2016. Annual review will expect to note incremental steps in full compliance. This could be accomplished by the teacher librarian developing a process and procedure for monitoring implementation.</p>
<p>14. Junior High Program</p> <ul style="list-style-type: none"> <li>• JHP1 The junior high program, grades 7-8, does not</li> </ul>	<p><b>Feedback:</b> While Family and Consumer Sciences (FCS) is a content area that can be incorporated into another content area in</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until</p>

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<p>include each curricular area. 281 – IAC 12.5(4)</p> <ul style="list-style-type: none"> <li>• JHFCE1 The family and consumer education content area in grades 7-8 does not include all the content specifications. 281 – IAC 12.5(4)(i)</li> </ul>	<p>grades 7-8, the district was unable to demonstrate the intentional incorporation of all required content specifications for FCS into another, or other, content areas.</p> <p><b>Evidence Needed:</b> Provide a scope and sequence or some other documentation noting in what content area each FCS content area specification is intentionally incorporated.</p>		<p>the district's next site visit. (Review the FCS documentation for grades 7 and 8)</p> <p><b>Status as of 6/21/11:</b> A plan is in place to include FCS in grades 7 and 8. The district will forward the 2011-2012 master schedule for grades 7 and 8 noting FCS, as well as forward enrollment information.</p>
<p>15. Professional Development</p> <ul style="list-style-type: none"> <li>• ACPD1 Professional development plans are not in place for each district attendance center. 281 – IAC 12.7(1)(b)</li> <li>• ACDP2.2 Attendance center professional development plans</li> </ul>	<p><b>Feedback:</b> Only an attendance center plan for the middle school was presented in documentation. Additionally, neither the district professional development plan nor the middle school professional development plan overtly noted how the plans addressed the Iowa Teaching Standards.</p> <p><b>Evidence Needed:</b> Submit professional development plans for each of the district's attendance</p>		<p>August 15, 2011</p> <p>Ongoing, by June 20 annually until the district's next site visit.</p> <p><b>Status as of 6/23/11:</b> A new professional development has been established and met. A</p>

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<p>are not in place that address the Iowa teaching standards. 281 – IAC 12.7(2)(b)</p>	<p>centers and note each plan's connection with the Iowa Teaching Standards.</p>		<p>documented professional development plan for the district will be completed by the end of the 2011-2012 school year.</p>
<p>16. Personnel Evaluation</p> <ul style="list-style-type: none"> <li>• PE8 The school district does not implement its evaluation procedures for all administrators. 281 – IAC 12.3(3) and Iowa Code 279.23A</li> </ul>	<p><b>Feedback:</b></p> <ul style="list-style-type: none"> <li>• While a signed and dated summative evaluation could not be found for the superintendent, a board member was able to verify the superintendent was evaluated through closed board sessions. The board has established goals for the superintendent and the superintendent delegates various aspects of his goals onto building administrators. Board members reported they are not currently using an evaluation instrument aligned with the Iowa Standards for School Leaders. The school board is encouraged to review the superintendent/administrator evaluation instrument available on the School Administrators of Iowa (SAI) or Iowa Association of School Boards (IASB) websites. The district could develop its own evaluation instrument, but it must incorporate the Iowa Standards for School Leaders. Ensure the summative evaluation is</li> </ul>		<p>June 15, 2011</p> <p>Status as of 6/23/11: Administrator evaluation -- Individual professional development plans for each administrator will be developed and implemented by the end of the 2011-2012 school year.</p> <p>Annual review will occur until the district's next site visit.</p> <p>Status as of 6/23/11: Teacher</p>

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	<p>signed and dated by the superintendent and the school board president. and ensure it is signed and dated. Additionally, use the SAI sample individual growth plan instrument for superintendents and administrators.</p> <p><b>Evidence Needed:</b></p> <ul style="list-style-type: none"> <li>• Provide for on-site review of the signed and dated individual growth plan for the superintendent and each principal for the 2010-2011 school year.</li> </ul> <p><b>Feedback:</b></p> <ul style="list-style-type: none"> <li>• Evidence of pre and post observation of teachers at the high school level was not demonstrated.</li> <li>• Individual growth plans were not found for some middle school teachers, the BEDS reported school guidance counselor, or gifted and talented teachers.</li> <li>• A written summative evaluation was not found for the BEDS reported school guidance counselor.</li> </ul> <p><b>Evidence Needed:</b></p> <ul style="list-style-type: none"> <li>• Collect the documentation needed to verify pre and post observation of the high school teachers reviewed at the time of the site visit; the individual growth plans for the middle school</li> </ul>		<p>evaluation -- Provide documentation of pre/post observation during the summative evaluation year, as well as signed and dated annually reviewed teacher individual growth plans.</p> <p>Review will occur annually until the district's next site visit.</p> <p>Note: As of 6/23/11 the district has hired an appropriately licensed K-12 guidance counselor. All teachers, guidance counselors, and gifted and talented teachers are on the district's evaluation cycle</p>

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<ul style="list-style-type: none"> <li>EV3 The school district does not implement its evaluation procedures for all teachers. 281 – IAC 12.3(3) and Iowa Code 279.14</li> </ul>	<p>teachers, the BEDS reported school guidance counselor, and gifted and talented teachers noted on the list sent to the superintendent during the site visit; and the written, summative evaluation of the BEDS reported school guidance counselor for on-site review.</p>		<p>and will be appropriately evaluated.</p>
<p>17. Employee Health Records</p> <ul style="list-style-type: none"> <li>PE1 Personnel files show no evidence of physical exams before or within six weeks of the beginning of service. 281 – IAC 12.4(14)</li> </ul>	<p><b>Feedback:</b> Health records were not found for some high school and elementary teachers, none of the substitute teachers, BEDS reported school guidance counselor, school nurse, paraeducator, gifted and talented teachers, or teacher librarian.</p> <p><b>Evidence Needed:</b> Provide health records for the aforementioned individuals (a list was sent by separate email with the individual's names during the site visit) for on-site review.</p>		<p>June 15, 2011</p> <p>Status as of 6/23/11: The district is completing a review of personnel files. When completed the interim superintendent will forward a written verification that the file review has been completed and all staff files contain a health record.</p>

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<p>18. Teacher Licensure</p> <ul style="list-style-type: none"> <li>• TL1 The school district employs Robert Alden, Folder # 326642, who is not certified to teach grades 9-12. 281 – IAC 12.4(8)</li> <li>• TL2 The school district employs Linda Michels, Folder #167693, who is not endorsed to teach school guidance in grades K-12. 281 – IAC 12.4(8)</li> </ul>	<p><b>Feedback:</b></p> <ul style="list-style-type: none"> <li>• The district was informed on December 16, 2010 that Ms Michels was to be immediately removed from the assignment to teach and implement the school guidance program. One recourse is for Ms. Michels to apply and obtain a Class B Conditional License for this assignment.</li> <li>• The district was informed December 16, 2010 that Mr. Alden was to be immediately removed from the assignment to teach Algebra and Geometry for high school credit to 8<sup>th</sup> grade students.</li> <li>• Failure to comply with the aforementioned actions risks an ethics violation on the license of the administrators involved. Neither are the teachers mentioned to be paid by the district while in these positions.</li> </ul> <p><b>Evidence Needed:</b> Immediately provide evidence of who is currently teaching Algebra I and Geometry for high school credit to 8<sup>th</sup> grade students and the certification of this individual; and to immediately provide evidence of who is teaching and implementing the school guidance program to students in grades K-12 and the certification of this individual.</p>		<p>Immediately</p> <p>Superintendent notified December 16, 2010</p> <p>Status as of 6/23/11: Robert Alden and Linda Michels are no longer employed by the district.</p> <p>Appropriately licensed teachers are now serving as guidance counselor and as teacher of high school credit courses for 7<sup>th</sup> and 8<sup>th</sup> grade students. The district has established a procedure for acceleration for 7<sup>th</sup> and 8<sup>th</sup> grade students.</p> <p>Approved 6/23/11</p>

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<p>19. Attendance Center and Course Enrollment Data</p> <ul style="list-style-type: none"> <li>• EQ3 No evidence exists for the annual review of district, attendance center, and course enrollment data. 281 – IAC 12.1(1)</li> <li>• EQ4 Data regarding district, attendance center, and course enrollment on the basis of gender, disability, race, and/or national origin do not exist for each subgroup. 281 – IAC 12.1(1)</li> </ul>	<p><b>Feedback:</b> The high school principal provided incomplete attendance center and course enrollment data on the last day of the site visit saying the district's student management system could not provide the information. He indicated no other actions had been taken to collect the needed data or that any attempts to collect this information for the purpose of decision making and placement of students had ever occurred.</p> <p><b>Evidence Needed:</b> At minimum, submit a plan for the annual review of the high school attendance center and course enrollment data, how the data will be used, for what purpose, and who will be involved. Data and plans for the the 2011-2012 school year will be reviewed.</p>		<p>June 15, 2011</p> <p>Status as of 6/23/11: The district is implementing its plan to review attendance center and course enrollment data in the process of developing its 7-12 master schedule for the 2011-2012 school year. This will be completed by July 15, 2011. At that time a summary of attendance center and course enrollment data findings will be forwarded to the Iowa Department of Education.</p>

**Areas of Non-Compliance: Outside of Chapter 12**

<b>Outside of Chapter 12 Non-compliance Issues</b>	<b>Additional Details</b>	<b>Plan of Correction</b>	<b>Timeline for Completion</b>
<p>20. The district's policy on non-discrimination in employment omits reference to all required protected classes. Title IX 34CFR 106.9 Section 504 34 CFR 104.8, Iowa Code 216.6</p>	<p><b>Feedback:</b> The following policies regarding non-discrimination in employment omitted certain protected classes:</p> <ul style="list-style-type: none"> <li>• 102: discrepancy between 102 recently approved and 102 posted on district Web. 102 on Web omits creed and socioeconomic status. <b>Policy will be corrected at July 18, 2011 board meeting and posted on district web.</b></li> <li>• 102.E1 recently board approved omits socioeconomic status. <b>Will be corrected at July 18, 2011 board meeting.</b></li> <li>• 302.1 states protected classes correctly, but is not yet board approved. <b>302.1 was approved 4/14/08</b></li> <li>• 303.2 states protected classes correctly, but is not yet board approved. <b>303.2 was approved 4/14/08.</b></li> <li>• 405.2 (Web posted policies) omits sexual orientation and gender identity. <b>Policy 405.2 has not yet been revised or approved. On board agenda for 7/18/11</b></li> </ul>		<p>April 1, 2011</p> <p><b>Status as of 6/23/11: All revised and approved policies and copy of their posting on the district's website will be sent to the Iowa Department of Education by July 30, 2011.</b></p>

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
	<ul style="list-style-type: none"> <li>411.2 (Web posted policies) omits sexual orientation and gender identity. Policy 411.2 has not yet been revised or approved. On board agenda for 7/18/11.</li> </ul> <p><b>Evidence Needed:</b> Please provide a copy of the district's revised non-discrimination statement in employment policies as noted above noting the board approval date. Additionally, please submit a copy of the board minutes noting the board's approval of the policies.</p>		
<p>21. CNP4 No evidence exists that the district's Wellness policy incorporates guidelines for reimbursable school meals that are not less restrictive than regulations and guidance issued by the Secretary of Agriculture pursuant to subsections (a) and (b) of the section 10 of the Child Nutrition Act (42 U.S.C. 1779 and</p>	<p><b>Feedback:</b> Policy 513.1 does not provide sufficient information regarding the requirement for guidelines for reimbursable school meals.</p> <p><b>Evidence Needed:</b> Please submit the district's revised School Wellness policy noting sufficient information regarding guidelines for reimbursable school meals. Additionally, submit school board meeting minutes noting approval of the revised policy.</p>		<p>April 1, 2011</p> <p>Status as of 6/23/11: Policy 513.1 is under revision and will be sent to the Iowa Department of Education along with board minutes noting approval when completed.</p>

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>sections 9(f)(1) and 17(a) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1758(f)(1), 1766(a), as those regulations and guidance apply to schools.</p>			
<p>22. EQD2 The district's non-discrimination statement omits reference to all required protected classes. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV.O and V.C.</p>	<p><b>Feedback:</b>  The district's non-discrimination notification statement: annual notification in district newsletter, <b><i>The Royal Informer</i></b>, disseminated in January 2010 and presented as documentation and was sent to all the community omits reference to socioeconomic status. Please refer to the following sample non-discrimination statement:  It is the policy of the _____ Community School District not to illegally discriminate on the basis of race, color, national origin, gender, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. There is a grievance procedure for processing</p>		<p>August 15, 2011   Approved 6/23/11</p>

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
	<p>complaints of discrimination. If you have questions or a grievance related to this policy please contact the district's Equity Coordinator, <u>Name</u>, <u>Title</u>, <u>Address</u>, <u>Phone Number</u>, <u>E-mail Address</u></p> <p><b>Evidence Needed:</b> Please provide a copy of the district's revised non-discrimination statement noting the board approval date. Also submit a copy of the board minutes noting the board's approval of the policy. Additionally, submit a copy of the non-discrimination statement as placed in the district newsletter for the 2010-2011 and 2011-2012 school years.</p>		
<p>23. EQD3 The district's non-discrimination notification in major written publications: parent, student, employee handbooks, registration handbook, coaches' handbooks, brochures about the district, Web site, and school newsletters omits</p>	<p><b>Feedback:</b> The district does not place its non-discrimination statement in a variety of district publications, such as the following: Preschool Handbook, Faculty Handbook, Coaches Handbook, Parent/Student Handbooks. The district has, however, placed the Equal Opportunity in Education Program policy in district handbooks and some of them omit protected classes in those policy statements.</p>		<p>August 15, 2011</p> <p>Status as of 6/23/11: The district's non-discrimination statement is not uniformly noted in all district major publications. Work to accomplish this is in progress.</p>

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>reference to all required protected categories. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV.O and V.C.</p>	<p>Please refer to the following sample non-discrimination statement:  It is the policy of the _____ Community School District not to illegally discriminate on the basis of race, color, national origin, gender, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. There is a grievance procedure for processing complaints of discrimination. If you have questions or a grievance related to this policy please contact the district's Equity Coordinator, <u>Name</u>, <u>Title</u>, <u>Address</u>, <u>Phone Number</u>, <u>E-mail Address</u></p> <p><b>Evidence Needed:</b>  Provide a copy of the district's revised non-discrimination policy statement noting the board approval date and the non-discrimination statement as placed in district major</p>		

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
	publications, as noted (provide copies of the revised non-discrimination statement in each major publication). On-site review.		
24. EQD4 The school district does not have an Equal Employment Opportunity/Affirmative Action Plan (EEO/AA). Iowa Code 19B.11, 281 – IAC Chapter 95	<p><b>Feedback:</b> While the district does have qualitative goals regarding EEO/AA and certain policies required in an EEO/AA plan, the district does not have a board approved EEO/AA plan encompassing all of the following: board policy on non-discrimination, board policy on affirmative action, board policy on harassment and bullying, name/position/phone number/email address of the EEO/AA coordinator, an administrative statement, qualitative analyses, qualitative goals, workforce analyses, quantitative analyses, and numerical goals. Access the Iowa Department of Education website for information at: <a href="http://www.iowa.gov/educate/index.php?option=com_content&amp;task=view&amp;id=485&amp;Itemid=1213">http://www.iowa.gov/educate/index.php?option=com_content&amp;task=view&amp;id=485&amp;Itemid=1213</a> for the document, <i>Required Components of an EEO/AA Plan</i>.</p> <p>Evidence Needed: Submit the district's EEO/AA plan and a copy of the board meeting minutes noting approval of the plan.</p>		<p>June 15, 2011</p> <p>Status as of 6/23/11: The district is in the process of developing its EEO/AA plan. Contact Margaret Jensen Connet at the Iowa Department of Education for assistance. (<a href="mailto:Margaret.jensenco@iowa.gov">Margaret.jensenco@iowa.gov</a>)</p>

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
<p>25. T2D3 The district's assessment of technological literacy does not include all required information. Title II-D MCLBA Sec. 2402(b)(2)(A)</p>	<p><b>Feedback:</b> The district's assessment of technological literacy does not indicate how proficiency is determined, including the cut point or percentage of proficiency expected.</p> <p><b>Evidence Needed:</b> Submit information regarding how proficiency is determined, including the cut point or percentage of proficiency expected on the district's assessment of technological literacy.</p>		<p>June 15, 2011</p> <p>Approved 6/23/11</p>