



STATE OF IOWA

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DEPARTMENT OF EDUCATION
JASON E. GLASS, DIRECTOR

July 7, 2011

Superintendent Gary Norris
Waterloo Community School District
1516 Washington St.
Waterloo, Iowa 50702

Dear Superintendent Norris:

Attached is the report of findings for the Comprehensive School Improvement Site Visit conducted at Waterloo Community School District (CSD) on April 25 – 29, 2011. The report is based upon a variety of interviews conducted with district staff and stakeholder groups during the indicated dates, and review of documents submitted to the Department and on-site.

The site visit was designed to assess the district's progress with its Comprehensive School Improvement Plan (CSIP), provide a general assessment of educational practices within the district, make recommendations for improvement, and determine compliance with state accreditation standards and applicable federal program requirements.

Based on the findings from the comprehensive site visit, Waterloo CSD maintains State of Iowa accreditation; however, non-compliance issues were identified. These issues are included in the Chapter 12 Non-compliance Matrix and the Outside of Chapter 12 Non-compliance Matrix contained in the site visit report. The district must resolve the identified issues through completion of corrective actions according to agreed upon timelines. Department follow-up will be conducted to verify resolution of the identified non-compliance issues.

The report reflects consensus of the following team members:

Department of Education Representatives:

Barbara Anderson, Consultant, Bureau of Student and Family Support Services
Colleen Anderson, Consultant, Bureau of Teaching and Learning Services
Donna Christensen, Special Education Cadre
Wilma Gajdel, Consultant, Bureau of Accreditation and Improvement Services
Dale Gruis, Consultant, Bureau of Community Colleges and Career and Technical Education
Beth Happe, Consultant, Bureau of Accreditation and Improvement Services
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Marietta Rives, Consultant, Bureau of Student and Family Support Services
Susan Selby, Consultant, Bureau of Teaching and Learning Services
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Peggy VanKirk, Special Education Cadre
Susan Walkup, Consultant, Bureau of Student and Family Support Services

Area Education Agency 267 Representatives:

Amy Knupp, Special Education Administrator
Christine Mangrich, Consultant for Curriculum Development
Jim Reed, Special Education Administrator
Jerry Schnabel, Service Area Director, Information and Technology

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Helping Communities Meet the Learning Needs of All Their Children and Adults

Kim Swartz, Educational Services Administrative Intern

Local Education Agency Representatives:

Aaron Green, Director of Student Equity, Cedar Rapids CSD
Kerri Nelson, Superintendent, South Tama County CSD
Kindall Todd, Middle School Teacher, Sioux City CSD

It is our hope this report will provide guidance to enhance student achievement in the district and support continuing conversations among staff and community members about the local education system, how and what students are learning, and how *more* students can learn at higher levels.

As part of Waterloo CSD's continuous improvement process, the district must review its current CSIP and provide revisions as needed. Revisions should be based on the district's needs assessments (including the attached report), student achievement data, stakeholder input, and established priorities. Recertification of the CSIP must be completed by September 15th, 2011. Directions for revision and submission of the CSIP can be found at: <https://www.edinfo.state.ia.us/securelogin.asp>.

The Department would appreciate the district's feedback regarding its site visit experience. This feedback will inform the Department's efforts to continuously improve the comprehensive site visit process. A short online survey has been developed and is available at the following site: https://www.surveymonkey.com/s.aspx?sm=DzavrdTJ9dG_2f_2fh3sB0Mb0g_3d_3d. The survey will take approximately ten minutes to complete. Responses are confidential and shared in aggregate form with members of the Department's School Improvement Team.

The visiting team again extends its gratitude to you and the Waterloo CSD staff and patrons in preparing for and showing courtesy during the visit. Thank you for your time and cooperation.

Sincerely,



Wilma M. Gajdel
School Improvement Consultant
Bureau of Accreditation and Improvement Services
Iowa Department of Education



Del Hoover, Deputy Administrator
Bureau of Accreditation and Improvement Services
Iowa Department of Education

cc: Site Visit Team Members
School Board President
Iowa Department of Education Official File
AEA Office

Comprehensive Site Visit Iowa Department of Education



Waterloo Community School District

**Team Findings
April 25 – 29, 2011**

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 values of respecting and valuing diversity.

Noted Strengths:

1. Information provided through the district overview and interviews with board members and the extended cabinet indicated the district vision, mission, goals, and strategic plan guide school improvement efforts. Board members reported a broad range of stakeholders was convened shortly after the superintendent was hired to revisit the district vision and mission statements and provide input into the creation of the strategic plan. In addition, in an effort to ensure district initiatives are aligned with the strategic plan, the mission statement is read at each board meeting, the mission and district goals are posted throughout the district, and goals are referred to when board decisions are made. Board members indicated their primary goal is academic achievement.

Administrators reported the strategic plan provides the foundation for moving staff in “one direction for all,” with a “persistent and relentless focus on achievement and growth.” All staff interview groups spoke of the district’s efforts to ensure strategies are implemented district-wide, such as Instructional Decision Making (IDM) and Positive Behavior Interventions and Supports (PBIS), to support the strategic plan.

2. Teachers at the elementary and middle school levels clearly understood the shared vision of effective instruction as identified in the district. They stated instruction is data-driven, based on reflective practice, follows the IDM model, and is supported by peer coaching and informal walk-throughs with feedback. The intended culture of the district is one in which failure is not an option and all students can achieve.

Recommendations for Improvement:

3. The superintendent, administrators, and school board members reported the district has revised its mission, vision, and goals. The accreditation site visit team received limited evidence through interviews that the district mission, vision, and goals are known, understood, and/or embraced by all district stakeholders. Commitment to, and promotion of, the academic, emotional, physical, and social development of each and every student is essential to achieve the district’s mission

and vision. In order to achieve the mission, it is critical all environments in which students engage are working in unison.

District administrators, staff, School Improvement Advisory Committee (SIAC) members, students, parents, and school board members are encouraged to do the following:

- Further define the mission and vision within each stakeholder group by engaging people in on-going conversations. For example, what do the mission and vision mean to building administrators, teachers, support staff, students, parents, SIAC, data teams, parent organizations, and district committees? What assumptions do people hold? What are the non-negotiables? What administrator and teacher behaviors might be expected to ensure the district reaches its vision?
 - Consistently use the mission as the foundation for district decision-making.
 - Consistently use the mission to leverage further change to positively impact student achievement.
 - Consistently use the district's plan to communicate the mission and vision
4. General education and special education collaborating teachers reported absence of a clearly articulated vision and goals for the district's special education program. Models for delivery of instruction to special education students are inconsistent from building to building. This may be because expectations are not clearly communicated at the district level so they can be implemented at the building level. Consider the need to review and hold conversations about subgroup data with all stakeholders to create understanding about district priorities and teacher roles and responsibilities throughout the program. (See additional statements related to special education: 17, 21, 27, 31, and 39.)

Leadership

In an improving district/school, leaders communicate a shared sense of purpose and understanding of the district/school's 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.
- The school board and district/school administrators implement an evaluation system that provides for the professional growth of all personnel.
- 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.
- Leaders at all levels understand and manage the change process.

Noted Strengths:

5. Elementary, middle, and high school teachers stated it is common practice for administrators to be in the classroom on a regular basis, noting that may even be multiple times daily. All teachers stated they value the administrators' presence and feedback. It has helped create a culture and climate of collaboration rather than a sense of "us and them." Multiple teacher interview groups reported they value the support received from building administrators. Principals and assistant principals confirmed the benefits of classroom observations, particularly through their beginning use of the I-Observation tool. This electronic tool allows principals time to be in the classroom, coach teachers, and provide prompt feedback on an on-going basis. Teachers also reported they will use I-Observation in the peer coaching process.
6. Elementary, middle, and high school teachers and learning supports staff described multiple opportunities to serve as leaders at the building and district levels. In some instances, such as Career Interest Academies and special education, teachers receive training through central office staff and then return to their respective buildings to replicate the training. Additionally, in many buildings teachers are invited to serve on committees or represent their buildings at the district level. Examples included curriculum adoption, PBIS, professional development, teacher quality (TQ), and Iowa Core committees.
7. High school students reported a variety of opportunities to develop and demonstrate leadership including the Mentors for Violence Prevention (MVP) Program which facilitates student-led discussions about how to handle "tough" situations; opportunities to mentor middle and elementary school students; community service project participation; Young Leaders in Action Program; Diversity Club; athletics; and Northern Iowa Schools Empowering Students Together (NICEST), a student coalition from Waterloo and Cedar Falls high schools, Columbus, and Price

Lab School to address stereotypes; as well as a variety of extra-curricular activities.

8. Administrators and board members reported a variety of mechanisms are in place to support communication. For example, Friday afternoon weekly updates from the superintendent help keep board members informed regarding such things as legislative issues, cabinet activities, collective bargaining, and district initiatives. A weekly electronic newsletter to staff also provides board members with information about district activities and programs. Other efforts, including the following, provide avenues for communication:
 - District newsletters available in English, Spanish, and Bosnian
 - Website, including archived information
 - Televised board meetings
 - Waterloo Courier articles on Sundays before board meetings and on Tuesdays after board meetings
 - Site Council
 - Student Voices
 - Customer Service Survey for parents
 - ConnectEd, a telephone service providing families with information about school closings and targeted calls regarding specific school and grade level events and activities

Recommendations for Improvement:

9. While a variety of mechanisms are in place to support communication, interviews indicated the district could benefit from an improved system of communication. The following examples were provided:
 - Parents reported the Infinite Campus student data management system and the district website are not regularly updated. In addition, building communication can be untimely.
 - Teachers at all levels stated they felt the majority of information and decisions come from central office with limited input from building staff. Some teachers reported there is a perception if a staff member questions a process or procedure being implemented, it will not be viewed positively by central office staff or that their input is valued.
 - Several teachers stated when staff are involved in district or building-level committees, they have access to information other staff do not have. Examples included, but were not limited to, PBIS, technology, curriculum development, and data teams.
 - Parents reported they were unsure of the process to report bullying/harassment.
 - High school students district-wide reported limited proactive opportunities to influence policies, procedures, or school-specific issues. Although there are structures such as student council, clubs, and organizations, students reported they are seldom asked for input and rarely receive a positive response when they initiate suggestions.

The district may wish to consider the following recommendations:

- Establish and communicate district expectations, as well as implementation procedures and timelines, for Infinite Campus.
- Extend invitations to administrators and teachers to engage in the study of *Fierce Conversations* and *Crucial Conversations*, both studied by central office staff, as a way to develop common understanding and use of the concepts in daily interactions. For example, when decisions are being made at the district level that impact buildings and staff, establishing an expectation, procedure, and climate for broad-based input in the decision-making process will demonstrate the district's respect for input and lead to improved understanding, or the rationale for, district actions. This can be successfully achieved through shared use of skills developed through the study of the aforementioned resources.
- Engage in a process to determine whether the district's current communication plan meets the needs of stakeholders. Ensure the communication plan assists staff in understanding how initiatives are connected, align with the Iowa Core, and use research as the foundation

or rationale for implementation. The communication plan should be attentive to all stakeholder information needs. Consider who needs to know what, by when, and through which communication venues. The communication plan should be used intentionally and consistently at the district and building levels to communicate effectively with the school board, administrators, teachers, support staff, students, parents, district committees, and the community.

- Review communication venues and information related to processes for reporting incidents of bullying/harassment. Enhance communication as needed.
- Examine current communication channels for student input to determine additional opportunities for meaningful input related to such things as district policies, procedures, hiring procedures and opportunities, and school-related issues. Determine where, when, and how student voices could be included and where students could be directly represented on district and attendance center committees and boards.

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 including content, instruction, and assessment.
- 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. Interviewees provided numerous examples of how the district develops and maintains collaborative relationships among stakeholders. Board members stated new facilities are supported through the one cent sales tax and the district places a priority on providing community members access to these facilities. School grounds are shared with the public. For example, high school outdoor tracks are available for community members to use for running and walking. In addition, organizations such as recreation leagues and Scouts also use school buildings and grounds for meetings and events. The district has, or is developing, sharing agreements with the cities of Waterloo and Evansdale for such things as television services, fuel purchasing, bus garage consolidation, and mowing. Waterloo and Evansdale also provide School Resource Officers (SROs) for the middle and high schools. The district shares facilities and staff with Hawkeye Community College, as well as athletic programs with neighboring districts. Junior Achievement, student mentors, volunteers, and business partnerships also support teaching and learning.
11. Teachers stated community partnerships and parent involvement in planned activities is essential to the success of each and every student. Examples of community partnerships and collaborative relationships with parents included the following:
 - Nursing home residents are reading buddies with students
 - Business partners host recognition celebrations for honor roll students
 - U.S. veteran volunteers mentor students
 - Partners-In-Education (PIE) organizations provide support, mentors, and internships
 - Waterloo food bank distributes food to families
 - Health services through Black Hawk County Health Services and community clinics
 - Parent Teacher Organizations
 - Thanksgiving dinner served with support of neighborhood church members (over 800 meals provided)
 - Family Nights (literacy, math, movie)
 - Parent-teacher conferences

Administrators and learning supports staff shared ways they are trying to connect with all families and students beyond the classroom. Some examples included Backpacks for Kids full of food for students on weekends or during breaks, Connected Calls where they welcome Bosnian and Spanish-speaking families in their native language, clothes closet, Welcome Center for English Language Learners (ELLs) at Hoover, and financial aid for families that need support to comply with the restricted dress code.

12. Teachers provided examples of opportunities to collaborate including data teams, peer observation and reflection, serving on building and district committees, and co-teaching. In addition to collaboration among adults, teachers reported instructional strategies are increasingly focusing on collaboration among students and the gradual release of responsibility (GRR) for learning from teachers to students. Teachers reported these opportunities foster a collaborative culture among staff.
13. Multiple interview groups at all levels reported the Home School Workers (HSW) as vital resources for teachers, students, and families. The HSW make frequent home visits which have strengthened the positive relationships with students and their families. HSW create avenues by which parents access community programs, help parents address immediate household needs, and support parents facing financial hardships.
14. Membership of the district's School Improvement Advisory Committee (SIAC) is diverse including parent representatives from each attendance center, community members, students, faculty, and administrators. Membership rotates periodically as three members stated they joined the committee this school year, while others stated they have been members for several years. During the interviews, it was reported open dialogue among the members is valued, and members feel safe to voice divergent viewpoints knowing the tone of the meeting will be productive. Interviewees conveyed a sense of commitment to the school improvement process. Members stated they would rearrange personal schedules in order to assure their attendance at the quarterly meetings. Interviewees estimated at least 90 percent of the nearly 50 committee members are present at each meeting. Appreciation was expressed for SIAC meeting minutes disseminated to all members within days of the meeting. In turn, interviewees stated they have a meaningful role in communicating with constituents of the group they represent. Parents stated they make regular reports to the schools' parent organization groups and community members take information back to a variety of community organizations. All interviewees reiterated it was important all district stakeholders receive accurate information. SIAC members take their role as communicator seriously. It was stated the district is responsive to questions, requests, suggestions, or recommendations. For example, if a member requests data or background information, it will be emailed to all members within a few days. It was also reported that issues brought to the SIAC meetings regularly become the foundation of the subsequent meeting agendas. Members feel they play an important role in the district's decision-making process.

Recommendations for Improvement:

15. While SIAC members reported steady participation of members in quarterly meetings, members reported the need to meet with greater frequency to provide continuity in addressing topics of concern. Additionally, SIAC members described their role as primarily that of providing input to the school board by way of administrators rather than a proactive procedure of identifying concerns, collecting data regarding the concern, and analyzing data to inform the development of formal recommendations to the school board. SIAC members also reported their need for assistance in acclimating to the role and function of the SIAC. The district is encouraged to consider the following actions:
 - Periodically review the role and responsibility of the committee with its members. Please refer to the Chapter 12 Rule Interpretation Matrix for detailed information:
http://www.iowa.gov/educate/index.php?option=com_content&task=view&id=1558&Itemid=23

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- Cultivate leadership among parent and community members leading to the identification of chair and co-chair positions
- Develop a list of frequently used educational acronyms and their definitions
- Formally document committee recommendations to the board
- Monitor progress of the approved SIAC recommendations
- Review past SIAC accomplishments with new members
- Assign veteran SIAC members as mentors to new members
- Periodically celebrate SIAC successes

16. Career and Technical Education (CTE) advisory committee membership is not representative of the district's overall demographics. For example, approximately 41 percent of Waterloo CSD students are minority: 29 percent African-American, 8.8 percent Hispanic, two percent Asian, and .9 percent Native American. Data provided by the district indicates the following:

- The Arts, Communication, and Business Advisory Committee consists of 19 members. Five are male, one is African American and one is Hispanic.
- The Engineering, Technology and Manufacturing Advisory Committee consists of 18 members. Seven are female, one is African-American and one is Native American.
- The Health and Human Services Advisory Committee consists of 18 members. Four members are male and 100 percent are Caucasian.

The district is advised to provide gender balance among the CTE advisory committees. Iowa Code 69.16A, as amended in 2009, places a strict gender balance requirement, effective January 1, 2012, for "all appointive boards, commissions, committees, and councils of a political subdivision of the state that are established by the Code, if not otherwise provided by law." This requirement, which applies to the CTE advisory committees, defines gender balance as half male and half female for even-numbered committees, or half plus one for odd-numbered committees. The district is also advised to maintain documentation of its efforts to seek CTE membership representation with regard to race/ethnicity.

17. Opportunities for collaboration among staff are an important aspect of the district's system of communication. Consider the following suggestions to enhance collaborative opportunities that directly support instruction:

- While paraeducators interviewed reported having informal opportunities for collaboration with teachers, these opportunities are not available on a regular basis. The district is encouraged to establish a formal collaboration time that occurs on a regularly scheduled basis for teachers and paraeducators to plan classroom and student support.
- Middle school and high school teachers reported collaborative teaching, including co-teaching, occurs throughout the district; however, there is inconsistent implementation of these models across the district. Some teachers have multiple teachers and/or content areas in which they are co-teaching, while others are in one content area. They also reported only a few teachers have had training on these models or have a common planning time to support co-teaching. The district is encouraged to review collaboration models, allocate time to ensure the selected models are implemented with fidelity, and seek assistance with training by contacting Edie Penno, AEA 267 Special Education Administrator (epenno@aea267.k12.ia.us).
- Collaborative teachers reported a need for designated time to be made available for general and special education collaborating teachers to meet and plan for co-teaching instructional activities. This time could be used by the content and special education teachers to discuss Individualized Education Program (IEP) goal attainment, specially designed instruction, accommodations for instruction and assessment, progress monitoring, strategy instruction, pre-teaching, re-teaching, and/or remediation. Both general and special education students have the opportunity to benefit when teachers share expertise in a structured and organized manner.

- Middle school general education and district special education teachers reported opportunities to collaborate within grade level teams are focused on IDM data review and intervention strategy identification; however, both groups of teachers expressed a need for additional time to meet with colleagues in common disciplines PK-12. The district is encouraged to strategically schedule grade-level and discipline-specific collaboration time to ensure balance in the system.
- Some district English as a Second Language (ESL) and special education teachers reported certain general education teachers are reluctant to work collaboratively to serve the educational needs of their students. The inability to work with general education teachers creates barriers for the teachers who are attempting to provide the most appropriate educational program for their students. It appears administrative intervention may be needed to clarify expectations for general education teachers when they are asked to collaborate with ESL and special education teachers on behalf of their students.

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. Students are guided to think critically about learning and have opportunities to apply learning to real world situations. Classrooms are integrated with diverse learners (i.e., gender, race, special needs, at-risk, gifted). 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:

18. Across multiple interview groups it was apparent district staff are dedicated to the belief all students can learn. Staff are intentional about making schools a positive place where students can be successful. High school students expressed appreciation for their teachers and school support staff. Many teachers are willing to work with students before and after school. Students described most staff as caring and interested in them as individuals.
19. Multiple stakeholder groups reported the district has taken measures to ensure students are safe while at school. All doors are locked, with the exception of the main entrances where anyone entering the building must present credentials. Parents reported the Raptor Visitor Monitoring System is appreciated. In addition to printing identification badges, the system provides a background check on each visitor. "Highlighters," individuals wearing bright yellow shirts and monitoring the environment at the high schools, are present and visible, providing another safety measure for students. Other district initiatives supporting safety and a positive school climate include PBIS, Students in Action, School Resource Officers (SROs) at the middle and high schools, Police Liaison Officers, district dress code, and high school campus monitors. District-wide bullying and harassment training and the Zero Tolerance policy also contribute to a positive learning environment, as reported by teachers. Single point entry and security cameras have been installed in each building. Monitors are visible in the main offices at most sites. Signs are visible on all school doors alerting visitors to stop in the office and sign in. Other examples included scheduled tornado and fire drills, lock-down drills, safety scenarios, and home visits to build relationships with students and families.

Recommendations for Improvement:

20. When asked how school might better prepare students for the next level of education, high school students stated there is a need for middle school staff to hold them more accountable. For example, they stated they were allowed to turn in late assignments and there were limited or

inconsistent consequences when building or classroom expectations were not met. High school teachers expect assignments are turned in on time and classroom procedures are carefully followed. They stated students would be more successful in high school if middle school expectations were “more strict” and implemented consistently. This may be an opportunity to draw together a group of students (see statement 8 regarding communication systems), high school and middle school teachers, and high school and middle school administrators to gather student input, develop recommendations, and share information garnered with appropriate district committees and work groups for consideration.

21. General education and special education teachers and parents reported a need for additional measures to provide increased support during transitions from one level to the next. District administrators reported decreases in student academic achievement as students transition from elementary to middle school.

Achievement Trends (All Students) by Graduating Class
Percentage of Students Proficient ITBS/ITED

Class of	Reading Comprehension		Math Total	
	Grade 5	Grade 6	Grade 5	Grade 6
2016	58.11	50.78	58.44	58.05
2015	65.75	51.77	64.79	53.79
2014	69.54	54.34	65.92	62.92
2013	56.5	49.63	52.36	53.81

Achievement Trends (Low SES) by Graduating Class
Percentage of Students Proficient ITBS/ITED

Class of	Reading Comprehension		Math Total	
	Grade 5	Grade 6	Grade 5	Grade 6
2016	48.15	42.3	50.29	51.56
2015	59.29	42.82	57.91	45.15
2014	63.25	43.02	58.12	54.67
2013	49.32	40.81	42.72	45.16

Teachers reported little or no knowledge of the vertical curriculum. Fifth grade teachers reported not meeting with sixth grade teachers and eighth grade teachers reported not meeting with high school teachers to discuss curricular expectations for students. Preparing students for the transition from elementary to middle school and from middle school to high school should include preparing students for increased curricular demands, in addition to day-to-day routines. The district is encouraged to provide teachers with the opportunity to engage in a curriculum alignment study of the enacted to intended curriculum. Teachers will have a better understanding of curriculum expectations in higher grades, as well as a better understanding of the intended curriculum at their own grade level. For assistance contact Christine Mangrich at AEA 267 for access to the Iowa - Curriculum Alignment Toolkit (I-CAT).

22. Documents reviewed indicated the Healthy Kids Act requirement of a minimum of 30 minutes of activity each school day in grades K-5 is met through recess time; however, some elementary teachers reported students receive only a total of 15 minutes of recess time each day. In addition to the need to meet Chapter 12 requirements related to the Healthy Kids Act, consider the potential positive impact related to social and emotional health and instruction in ensuring elementary students are provided the opportunity of at least 30 minutes a day of physical activity.

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 knowledge and skills needed to effectively implement characteristics of effective instruction. 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:

- Educators implement effective instructional practices for each and every student.
- School and classroom tasks and activities are inherently engaging, relevant, and lead to applying knowledge to authentic tasks.
- Content, instruction, assessments, and policy are aligned.
- 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.
- Instructional decision-making utilizes a process of collecting, analyzing, and summarizing data.

Noted Strengths:

23. The district is commended for developing the Career Interest Academy concept at the high school level. Focused on preparing students for college and career, academies include Arts, Communication and Business Academy; Health and Human Services Academy; and Engineering, Technology, and Manufacturing Academy. Processes have been initiated to guide students along career pathways through courses, internships, and work experiences. Students have flexibility to move among the academies as interests emerge. CTE advisory committee members expressed positive comments about the role of Career Interest Academies in helping students understand why academic concepts are relevant in the "real world."
24. Some elementary teachers reported implementing two uninterrupted blocks, 90 minutes each, for reading and mathematics. This is a result of analyzing classroom procedures and finding time that could easily be utilized for instruction. As a result, a policy including no phone calls or e-mails written or received by teachers and no scheduled restroom breaks for classrooms during these blocks has been implemented. Middle school principals said building schedules were adjusted to protect the literacy block for instruction in reading and language arts, as well as to ensure collaboration time for teachers. They also reported students are not pulled out of reading and mathematics for any reason.
25. High school students stated they have access to technology which they use to create projects to demonstrate their learning. Available technology includes Promethean boards, heart monitors, laptop mobile labs, iPods, classroom sets of graphing calculators, iPads, flip cameras, Athletic Huddle software, and computers in the library. They expressed enthusiasm for the Promethean boards stating, "everything happens in front of you" and, "teachers can be more organized and prepared." Students also indicated use of the boards often encourages shy students to be more involved in classroom activities because they are more engaged and interested. Additionally, elementary teachers reported technology has enhanced classroom instruction.

26. Teachers reported shared electronic folders on the district server provides the ability for them to share curriculum, flip charts, and other materials with colleagues across the district.

Recommendations for Improvement:

27. Some parents and teachers reported accommodations listed on the IEP for special education students are not always accepted and implemented by secondary general education teachers. If the accommodations are refused, and the student is unsuccessful in the content area classroom, the student may have to repeat the course. The special education teachers lack the authority or ability to influence the classroom practices of their peers. The laws in this area are clear. The district must ensure a child's IEP is accessible to each regular and special education teacher and that program modifications delineated in the IEP are provided.

Iowa Administrative Code r. 281—41.323(4)

41.323(4) *Accessibility of child's IEP to teachers and others.* Each public agency must ensure that:

- a. The child's IEP is accessible to each regular education teacher, special education teacher, related services provider, and any other service provider who is responsible for its implementation; and
- b. Each teacher and provider described in 41.323(4)"a" is informed of:
 - (1) His or her specific responsibilities related to implementing the child's IEP; and
 - (2) The specific accommodations, modifications, and supports that must be provided for the child in accordance with the IEP.

Iowa Administrative Code r. 281—41.320(1)"e":

e. A statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child, and a statement of the program modifications or supports for school personnel that will be provided to enable the child:

- (1) To advance appropriately toward attaining the annual goals;
- (2) To be involved in and make progress in the general education curriculum in accordance with 41.320(1)"a," and to participate in extracurricular and other nonacademic activities; and
- (3) To be educated and participate with other children with disabilities and nondisabled children in the activities described in this rule;

See statement 17 for information concerning collaboration among ESL, special, and general education teachers, as well as statement 39 for information related to concerns about the fidelity with which the consultative model is implemented, to provide instructional and support services to special education students.

28. ESL teachers reported concerns about inconsistent implementation of the ESL program and related activities throughout the K-12 system. Examples of inconsistency and gaps included the following:
- Understanding the role of the ESL teacher
 - Procedures for selecting general and ESL teaching partners at the high school level
 - Identification of the collaborative model for teachers of ESL sheltered classes and professional development to support the model
 - Focus of ESL instruction at the elementary level
 - Advocacy for ELLs
 - Identification of ELL students in special education
 - Program data for ESL

The district is encouraged to review ESL program services and practices. Have teachers and administrators had professional development in Sheltered Instructional Observation Practices (SIOP), equal opportunities to attend the Iowa Culture and Language Conference, and time to collaborate as general education and ESL teachers? Has the district established an evaluation plan for the program inclusive of frequent monitoring of the program, as well as summative determination of program effectiveness? Contact Annalisa Miner (annalisa.miner@aea267.k12.ia.us) or Lisa Wymore (lisa.wymore@aea267.k12.ia.us), AEA 267 English Language Learner Consultants, for assistance in establishing an evaluation plan and making any needed revisions in the program.

29. It does not appear there is a broad knowledge and understanding of the Iowa Core as reported by multiple groups. Examples included:

- Some teachers interviewed asked if they could stop using strategies from the Rigor, Relevance, Relationships, and Reflections (R4). Rigor and relevance is part of the characteristics of effective instruction supporting the Iowa Core.
- When questions regarding the Iowa Core were addressed, multiple teams were unable to articulate their involvement in the implementation of the Iowa Core. Occasionally, teachers referred to central office personnel and coaches/lead teachers who may have that knowledge.
- Several teacher groups reported they were unaware of where they could access Iowa Core resources such as the Statewide Moodle Site, the Iowa Core website, or the Common Core Standards in English/Language Arts and mathematics.

Ensure professional development and support for the Iowa Core are provided for teachers in all buildings, rather than limited to administrators, instructional coaches, and lead teachers in the district. The basic knowledge of concepts, vocabulary, and strategies related to the Iowa Core will assist teachers in understanding how current initiatives and past professional development support the Iowa Core.

30. There was a discrepancy in comments from various interview groups regarding the use of the PLATO computer-assisted instructional system. Administrators reported there were multiple opportunities for students to have supplemental support in offline activities with teachers and other students; however, teachers and students reported the supplemental activities consisted of pages out of books with little or no interaction with other students. The visiting team suggests the district investigate and expand the use of instructional strategies used in core content area in the alternative settings. This would include the addition of more hands-on projects and activities which supplement the current PLATO curriculum and provide career exploration and awareness.

31. Special education, collaborative teachers, ESL teachers, and administrators reported the need to increase the availability of instructional resources for all district teachers. These materials are needed to support core curriculum along with supplemental and intensive interventions. As textbooks are adopted, ensure there is consideration for needed supplemental materials to differentiate for all students, including ELL, gifted (extended learning), and special education students.

32. Parents, students, administrators, and teachers reported opportunities for extended learning are limited. Individual student data is collected through common formative assessments and other resources that could potentially help identify students who would benefit from supplemental and intensive instruction at a level that will extend and enrich their learning. Consider more focused conversations at data team meetings about interventions appropriate for these students.

33. The *High School Program of Studies* catalogue includes some descriptors which may appear to unfairly focus on characteristics of the learner rather than content of the course. For example, courses are listed as "Special Needs Classes." This is the only section in the handbook that states "attendance is very important" when providing course descriptors. In addition, the ELL U.S. Government course description states, "The study of government is the responsibility of all

citizens of the United States.” This descriptor is not listed for the courses identified as appropriate for other students. Consider revisiting the course description handbook to revise any descriptors of concern.

34. In regards to Title I services, it is not evident the district satisfies the federal requirement of “Parents’ Right-To-Know.” Districts receiving Title I funds are required by federal legislation to provide annual notification to parents of their right to know of teacher qualifications. A process must be in place to notify parents if their child has been assigned to, or has been taught for, four or more consecutive weeks by a teacher who is not highly qualified. To fulfill this requirement, the district must provide this information to parents in a language and form they are able to understand that ensures notification will occur should a child be taught for four or more weeks by a teacher who is not highly qualified. At this time, this will be cited as a recommendation; however, to avoid a future non-compliance citation, the “Parents’ Right-To-Know” must be in place within the district.

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:

- Professional development 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, are distributed throughout the school year, and are sustained over time.
- Time is provided for teachers to collaborate and apply new content and pedagogical knowledge.
- 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:

35. Multiple groups expressed appreciation for the professional learning opportunities provided through the district. Consider the following comments from interviewees:
- Particularly helpful to teachers were opportunities sustained over multiple years such as PBIS and IDM. They reported next year professional development related to writing strategies and Robert Marzano's nine strategies articulated in *Classrooms That Work* will continue.
 - Elementary teachers reported professional development initiatives align with district goals and that "we use what we learn every day." Teachers reported appreciation for the following aspects of professional development:
 - Building level professional development meets teacher needs.
 - Collaboration time with peers supports professional development training. Meetings are focused and provide opportunities for teachers to discuss instructional strategies and learn how other teachers are implementing them.
 - Coaching from administrators and peers helps reinforce reflective practices which improves instruction.
 - Instructional support staff reported the availability of professional development opportunities to support job performance. Examples included Mandt, Crisis Prevention Institute (CPI), PBIS, LifeLine training, and nonviolent crisis intervention.
 - Assistant principals stated professional development has focused on defining quality instruction. They reported using the Iowa Professional Development Model to structure professional development that supports implementation of strategies to enhance literacy (non-fiction writing). The gradual release of responsibility has been another focus for professional development at the middle and elementary school levels.
 - School board members reported engaging in multiple and varied professional development experiences. Networking opportunities available through the Urban Education Network (UEN) were described as an important resource for members as they provide opportunities for board members to discuss issues they have in common with districts of similar size. Members also reported they attend the Iowa Association of School Boards (IASB) annual conference and

participate in Academy of Board Learning Experiences (ABLE) training. They reported being proactive regarding issues they address, calling special work sessions to focus on specific issues and help them develop as board members.

Recommendations for Improvement:

36. It is evident efforts are in place to provide professional development that will move the district forward in its work to improve student achievement. As the district continues to plan and implement its professional development program, consider the following comments and suggestions from groups interviewed.

- Administrators and teachers interviewed reported having little input into decision making about the selection of professional development programming. One group of teachers interviewed reported a Professional Development Leadership Team has been recently formed by the district. The district is encouraged to insure this team is involved deeply in analyzing multiple sources of student data, identifying professional development targets, using appropriate criteria to judge the quality of research supporting models/strategies/programs, and engaging in a decision-making process for selection of content. This team should also be held responsible for clearly communicating this information with other teachers in the district, as well as monitoring and evaluation of the professional development program.
- Teachers in multiple interview groups expressed concern regarding the number of professional development initiatives. These include IDM, data teams, peer coaching, 4Rs (Rigor, Relevance, Relationships, Reflection), small group instruction, Marzano strategies, Powerful Lesson Planning, and writing cadre. Teachers reported a lack of understanding of the connections between these professional development initiatives. Central office personnel, building administrators, and teacher leaders are encouraged to implement measures in professional development sessions that illustrate connections between district initiatives. In addition, it is suggested the district clearly communicate to instructional staff the process that is in place for determining when an initiative is phased out or sustained.
- Teachers suggested the district provide differentiated professional development to teachers in an effort to meet their needs, just as there is the expectation for teachers to differentiate instruction for students. Differentiated professional development will also support teachers in meeting needs articulated in their individual teacher professional development plans. Teachers also suggested providing a focused orientation for staff new to the district to ensure they have foundational information related to currently implemented initiatives, as well as district/school processes and procedures. Additionally, teachers expressed a need for additional structured time for implementation of learned strategies.
- Teachers and administrators interviewed said they were not informed about how the evaluation of professional development helped inform decision-making about future professional development. If the district does conduct an annual evaluation of professional development at the building and district levels that includes a review of academic data and instructional strategy implementation, administrators are encouraged to share this information with teachers and building level leadership. This might also help teachers and administrators realize the linkages that exist between past professional development programming and future programming.
- A review of attendance center professional development plans indicated building goals are primarily designed to respond to weaknesses identified through Iowa Testing data. Teachers and administrators interviewed also referenced Iowa Testing data as the primary data source consulted in defining professional development goals and strategies. While Iowa Testing data is an important source of information for goal setting, best practice indicates that multiple sources of data should be the basis for district and building goals and professional development selection. The district is encouraged to provide a written summary of findings about student achievement based on multiple sources of data with interpretation about

patterns, trends, and implications. Share this with all administrators and teachers. In addition, as attendance center plans are developed, it may be helpful to consider inclusion of the following:

- A comprehensive description of what teachers will be studying and putting in place in the classroom
- A description of how (fidelity) and how often (frequency) teachers are to implement a strategy within their classrooms
- A description spelling out differing expectations for different role groups (for example physical education teachers using text less frequently will implement once every other week rather than daily)
- Instructional support staff indicated a need for professional development in the areas of classroom management, behavioral disorders, and specific disability areas. They also said they would appreciate training on the successful use of the Promethean boards. The district is encouraged to systemically provide training in these areas preK-12.

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.
- Summative evaluation processes are used to determine whether professional development has resulted in improved student learning.

Noted Strengths:

37. Teachers, learning supports staff, and administrators reported data teams have been established district wide to support the implementation of IDM. Data teams meet to review individual student assessment information, including common formative assessments, to ensure those who do not demonstrate proficiency on instructional benchmarks are provided supplemental and intensive supports to bring them to proficiency.
38. Although individual student areas of noncompliance were identified during the district's Special Education program procedural compliance review completed last fall, evidence has been submitted as of January 7, 2011, that these corrections have been made. The DE has also received a copy of the AEA letter stating the district level corrective action plan (CAP) has been fully implemented within the required timelines and all requirements have been met.

Recommendations for Improvement:

39. Basic Educational Data Survey (BEDS) Highly Qualified Teacher (HQT) data indicated the district's special education teachers use the consultative model to provide instructional and support services to special education students. Site interviews indicated there are concerns related to the integrity of the model, such as the following:
 - Some special education teachers assign grades for a subject in which she/he has no content endorsement.
 - Documentation is not available to indicate special education teachers regularly consult with general education teachers in such areas as IEP goal attainment, application of skills in the general education setting, specially designed instruction, and progress monitoring, etc.
 - Limited structured, common planning time for general and special education teachers is currently available.
 - Classroom schedules in some instances reflected primary instruction in core content areas is delivered in areas in which special education teachers are not endorsed as a teacher.This is an area for targeted technical assistance from AEA 267.
40. Multiple interview groups reported they were not aware if the district currently analyzes course and class enrollment data by race, ethnic background, gender, or disability and do not believe it is used in the decision-making process. The district is encouraged to investigate the use of Infinite

Campus, the district's student information management system, for its potential to extract these data. Course enrollment data can be used to determine enrollment patterns among the noted subgroups and, if identified, be used to develop strategies for ensuring over-representation of certain subgroups is reduced.

In addition, interviewees indicated while some teachers were able to use data to identify and articulate needs and actions on a student-by-student basis, they were not able to engage in a conversation about data regarding disaggregated sub-groups or aggregated data or understand the value of these data related to student achievement. The district is encouraged to develop and implement procedures system-wide to create greater teacher and counselor ownership of academic and climate-related data, as well as to build the capacity of counselors and teachers to collect, analyze, interpret, and take action based on both individual and sub-group level student data. For example, consider the benefit of examining the characteristics common to students who do not demonstrate proficiency in a given area and the implications for classroom instruction, supplemental and intensive service opportunities, and other supports to ensure students perform at the proficient and above level. In addition, consider reviewing data to determine supports necessary to move students from one level of proficiency to the next. Contact Joe Kremer, AEA Consultant (jkremer@aea267.k12.ia.us).

Additionally, Career and Technical Education Advisory Committee members demonstrated a strong understanding of the need to analyze disaggregated student achievement data and disaggregated student enrollment data. Consider providing the advisory committee with multiple examples of disaggregated student data.

41. Teachers and administrators reported developing and using common formative assessments (CFA) on a regular basis to monitor student progress and influence instructional decisions. In multiple interview groups, teachers expressed concern about the validity and rigor of the items as well as confidence in the decisions made based on the data from the CFA. It is recommended the district engage teachers in a study of horizontal curriculum alignment to better understand the intended curriculum; review CFA items for content validity, reliability, and rigor using both a categorical and depth of knowledge analysis; and provide teachers with professional development in item design.

In addition, multiple interview groups reported the data from CFAs are used to identify students needing intensive, supplemental, and core instruction. This is an example of a summative assessment used formatively. Students identified for intensive instruction receive the instruction in an after school program, FLASH. Supplemental instruction is provided to students pulled out of another instructional program during the school day. Although this is a useful formative assessment tool, it is not impacting current learning in the classroom. To have a greater impact on current student learning, it is recommended teachers receive professional development focused on the formative assessment process which provides daily and ongoing assessment of current learning. For assistance contact Christine Mangrich at AEA 267 to access professional development modules for collaborative learning teams on assessment for learning.

42. Multiple groups were not able to speak to a systemic process to evaluate the effectiveness of district programs. The visiting team is unclear as to whether there is a process in place or whether there is limited communication regarding the district's process for program evaluation. Administrators and instructional staff are encouraged to clearly communicate the process for program evaluation in areas such as at-risk, gifted and talented, library, counseling, ESL, and special education to establish/communicate procedures and practices which will provide relevant feedback. Ensure clear program goals that answer the question, "What do we want as a result of this program, initiative, or support service?" Identify and communicate 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. Consider contacting Jon McKenzie at AEA 267 to coordinate assistance.

43. SIAC members reported annually making recommendations to the school board regarding progress in reading, mathematics, and science, as well as other areas of concern such as studying the various aspects of a dress code policy. Administrators frequently seek input from the SIAC. Recent topics have included Infinite Campus, the 9th grade 21st Century Skills class, Advanced Placement (AP) classes, gifted and talented program, and International Baccalaureate. While opportunities to provide input are frequent, it was unclear the degree to which data are routinely shared, studied, or used with consistency in the SIAC's process of developing recommendations for the school board. District administrators are encouraged to provide training in data analysis for SIAC members and establish procedures for routinely collecting, analyzing, and using data to drive inquiry and make recommendations.
44. The district is expected to develop strategies to ensure poor and minority students are not taught at a higher rate than other students by inexperienced, unqualified, or out-of-field teachers. The superintendent stated plans are in place to identify incentives for teaching in hard to staff schools. In addition, the district might consider the following suggestions:
 - Ensure a district-wide procedure is in place to review enrollment rates of poor and minority students assigned to inexperienced, unqualified, or out-of-field teachers.
 - As an administrative team, review the hiring process to ensure the process is not contributing to poor and minority students being taught at a higher rate than other students by inexperienced, unqualified, or out-of-field teachers. For example, review the application, interview process, selection and placement decisions, and mentoring and induction program.

Waterloo Community School District's Compliance Status for 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 XC (Education of Homeless Children and Youth)

The district has one or more citations of Title XC non-compliance with CSIP program assurances identified during this visit.

Areas of Non-Compliance: Chapter 12

The Waterloo CSD 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	Documentation Needed	Plan of Correction	Timeline for Completion
1. GT7 The district does not provide any professional development with regard to gifted and talented programming. 281—IAC 12.5(12)	Documentation indicated professional development related to GT programming is not provided consistently across the district	Agendas or PD calendars for each attendance center reflecting PD related to GT programming		
2. SIAC4 The School Improvement Advisory Committee does not make annual recommendations to the board with regard to progress toward annual improvement goals, progress toward local indicators, and annual improvement goals for the next school year. 281—IAC 12.8(1)(a)(3)	No evidence provided SIAC makes recommendations to the board regarding annual improvement goals	Board minutes documenting recommendations for 2011-12 goals have been made	Documentation provided verifies process is in place for 2010-11	

Areas of Non-Compliance: Outside of Chapter 12

Outside of Chapter 12 Non-compliance Issues	Additional Details	Documentation Needed	Plan of Correction	Timeline for Completion
3. HCY4. Evidence that the district-adopted definition of homeless is not communicated in staff, parent, and student publications does not exist.		Copies of district publications including definition of homelessness		

Outside of Chapter 12 Non-compliance Issues	Additional Details	Documentation Needed	Plan of Correction	Timeline for Completion
281—IAC 33.3				
4. 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.	Nondiscrimination notification statements do not consistently include all required protected classes	Copies of major written publications including nondiscrimination notification statement		