Document Review Checklist and Non-Regulatory Guidance for School Districts
2012-2013 Comprehensive Site Visits

Documents for Desk Audit
Several documents previously reviewed on-site during the site visit are now included within the “Desk Audit” sections of this checklist. Items included within the “Desk Audit: Items for Electronic Submission” section are to be submitted by the district in electronic format to the site visit team leader for review at the Department.

- The electronic documents can be submitted via a flash drive, upload to a dedicated Google site, a link to items available on the district’s website, email as an attachment, or by other means.
- The due date for submission of the Desk Audit materials will be determined by the site visit team leader and communicated to the district.
- Whether or not the submitted items meet compliance requirements will be determined as of the date of submission.

Preparing for the On-Site Visit
In addition to desk audit items, other documents may be submitted in an electronic format to either a Google site or on a flash drive. Documentation pertaining to all document review items (electronic or hard copy) should be made available in the site visit team’s designated workroom (as applicable) for review during the site visit. It is expected the documentation be organized by using notebooks, folders, or other means coded by the item numbers/letters listed (e.g., 1a and 1b) in a way that is efficient for the district and easy to follow by team members.

- Whether or not the documentation provided for these items meets compliance requirements will be determined as of the final day of the visit.

All Accreditation Requirements Versus Items Reviewed During the On-Site Visit
Chapter 12 of Iowa Administrative Code contains the accreditation requirements for schools and school districts. Although all requirements contained within Chapter 12 are not specifically monitored during the on-site visit process, this does not absolve the LEA from addressing these items. It is the responsibility of LEA leadership to assure ALL accreditation requirements are met on an ongoing basis. If the site visit team becomes aware of areas of Chapter 12 non-compliance regarding issues not contained on this checklist, these items will be included within the citations contained in the site visit report. For additional guidance, the LEA is advised to obtain a copy of the Chapter 12 Rule Interpretation Matrix from the Department of Education website at: http://educateiowa.gov/index.php?option=com_content&task=view&id=1558&Itemid=2342.

Desk Audit: Items for Electronic Submission

1. Board adopted policies that address the following content:

Guidance Regarding All Board Policies:
The Iowa Association of School Boards (IASB) sample policies indicated below are provided as a reference only. While it is common to find districts that use this service from IASB, there is no requirement that a district do so. If a district does use the IASB samples, care should be taken to “localize” the content to assure alignment with district practices.

a. Accessibility (SR7) and confidentiality (SR8) of student records in compliance with FERPA (34 CFR §99), Iowa Code Chapter 22, and 281—IAC 12.3(4)

Guidance:
IASB Sample Policy: 506.1 (Last updated, 4/26/12)
FERPA requirements can be accessed online at: http://www.access.gpo.gov/nara/cfr/waisidx_04/34cfr99_04.html. Specific requirements regarding the documentation required for requests and disclosures of student record information is contained in 34 CFR §99.32.

_____ b. Graduation requirements (GR1) 281—IAC 12.3(5)

Guidance:
District policy must be consistent with requirements contained in 281—IAC 12.5(5), which state, “Beginning with the 2010-2011 school year graduating class, all students in schools and school districts shall satisfactorily complete at least four units of English and language arts, three units of mathematics, three units of science, three units of social studies, and one full unit of physical education as conditions of graduation. The three units of social studies may include the existing graduation requirements of one-half unit of United States government and one unit of United States history.”

IASB Sample Policies: 505.5 (last updated, 12/4/08) and 505.6

_____ c. Student responsibility and discipline, including the following:

Guidance:
The student responsibility and discipline policies required under this section shall ensure due process rights for students and parents.

SF 588 of 2007 added section 279.66 to the Code of Iowa. This section (Discipline and Personal Conduct Standards) requires the board of directors to review and to modify existing student discipline and conduct policies. “The policy shall specify the responsibilities of students, parents and guardians, and practitioners in creating an atmosphere where all individuals feel a sense of respect, safety, and belonging, and shall set forth the consequences for unacceptable behavior. The policy shall be published in the student handbook.”

_____ 1. Use of tobacco (RD1.2) 281—IAC 12.3(6), Title IV-A NCLBA Sec. 4114(d)(7)(E)

Guidance:
IASB Sample Policy: 502.7 (last updated, 8/31/91) and 905.2 (Tobacco Free Environment- last updated, 7/28/08)

_____ 2. Use or possession of alcoholic beverages or any controlled substances (RD1.3) 281—IAC 12.3(6), Title IV-A NCLBA Sec. 4114(d)(7)(A) and (E)

Guidance:
IASB Sample Policy: 502.7 (last updated, 8/31/91)

_____ 3. Violent, destructive, and seriously disruptive behavior (RD1.5) 281—IAC 12.3(6), Title IV-A NCLBA Sec. 4114(d)(7)(A) and (E)

Guidance:
IASB Sample Policy: 503.1(last updated, 10/10/02)

_____ 4. Suspension and expulsion (RD1.6) 281—IAC 12.3(6)

Guidance:
IASB Sample Policies: 503.1 (last updated, 10/10/02), 503.2 (last updated, 3/31/89), 503.5 (last updated, 12/4/08)

_____ 5. Weapons (RD1.7) 281—IAC 12.3(6), Iowa Code 280.17B and 280.21B, Title IV-A NCLBA Sec. 4114(d)(7)(A)

Guidance:
IASB Sample Policy: 502.6 (last updated, 10/10/02)
d. Selection and reconsideration of school library materials (LP11.1); confidentiality of student library records (LP11.2); and legal and ethical use of information resources, including plagiarism and intellectual property rights (LP11.3)

\[281—\text{IAC 12.3(12)(c)}\]

\textbf{Guidance:}
IASB Sample Policies: 506.1 and 506.2 (both last updated 4/26/11), 506.4, 605.1, 605.3, 605.4, 605.7 (all last updated 8/31/07)

e. Policy prohibiting harassment and bullying of or by students, staff, and volunteers (RD1.4) which is based on actual or perceived age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or familial status and which creates an objectively hostile school environment (HBP1). \[281—\text{IAC 12.3(13)}, \text{Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1}\]

\textbf{Guidance:}
Harassment and bullying is construed to mean any electronic, written, verbal, or physical act related to the specified traits or characteristics stated above. The local board policy must contain all of these 17 traits or characteristics, but does not need to be limited to these 17.

According to Iowa Code 280.28(3): On or before September 1, 2007, the board of directors of a school district and the authorities in charge of each accredited nonpublic school shall adopt a policy declaring harassment and bullying in schools, on school property, and at any school function, or school sponsored activity regardless of its location, in a manner consistent with this section, as against state and school policy. The board and the authorities shall make a copy of the policy available to all school employees, volunteers, students, and parents or guardians and shall take all appropriate steps to bring the policy against harassment and bullying and the responsibilities set forth in the policy to the attention of school employees, volunteers, students, and parents or guardians.

If a single policy is used, a reasonable person must be able to interpret the policy as covering student vs. student, student vs. staff, staff vs. staff, and staff vs. student issues.

There is a sample policy available on the Department website which addresses the legislated requirements at: http://educateiowa.gov/index.php?option=com_content&task=view&id=1030&Itemid=1293.

IASB Sample Policy: 104 (last updated, 9/27/07)

f. School districts that receive federal E-rate funds (all schools in Iowa) - Internet appropriate use policy with these provisions: (IAUP1) \textit{Children’s Internet Protection Act (CIPA)}

\begin{itemize}
  \item 1. Monitoring the online activities of students including provisions regarding training students about appropriate online behavior, including interaction on social networking sites and chat rooms, and cyberbullying awareness and response. (IAUP2)
\end{itemize}

\textbf{Guidance:}
IASB Sample Policy: 605.6 (last updated, 4/17/12)

g. Policy to ensure that students are free from discriminatory practices in the educational program (MC/GF policy) (MCGF1) \[281—\text{IAC 12.5(8)}\]

\textbf{Guidance:}
In addition to adopting a MC/GF policy, the district is to incorporate multicultural gender fair goals into its comprehensive school improvement plan within C-Plan. This requirement is verified during the Department’s review of the CSIP section of C-Plan.
Multicultural (MC) approaches to the educational program are defined as those with foster knowledge of, and respect and appreciation for, the historical and contemporary contributions of diverse cultural groups, including race, color, national origin, sex, disability, religion, creed, and socioeconomic background. The contributions and perspectives of Asian Americans, African Americans, Hispanic Americans, American Indians, European Americans, and persons with disabilities.

Gender fair (GF) approaches to the educational program are defined as approaches which foster knowledge of, and respect and appreciation for, the historical and contemporary contributions of women and men to society. The program shall reflect the wide variety of roles open to both women and men and which provide equal opportunity to both sexes.

IASB Sample Policy: 603.4 (last updated, 8/2011)

_______ h. Provision of special education and related services, including

_______ 1. Provision of a free appropriate public education (SPEDP1) 281—IAC 41.404(1)(a)

Guidance:
IASB Sample Policy: 603.3 (last updated, 12/4/08)

Note:
It is not uncommon to find outdated versions of this policy. Versions based on older guidance documents are often missing the word “free” and reference only “appropriate public education”.

_______ 2. Provision of special education and related services (SPEDP2) 281—IAC 41.404(1)(b)

Guidance:
IASB Sample Policy: 603.3 (last updated, 12/4/08)

_______ 3. Provision of special education and related services in the least restrictive environment (SPEDP3) 281—IAC 41.404(1)(c)

Guidance:
IASB Sample Policy: 603.3 (last updated, 12/4/08)

_______ 4. Protecting the confidentiality of personally identifiable information (SPEDP4) 281—IAC 41.404(1)(d)

Guidance:
IASB Sample Policy: 506.1 (last updated, 4/26/12)

_______ 5. Graduation requirements for eligible individuals (SPEDP5) 281—IAC 41.404(1)(e)

Guidance:
IASB Sample Policy: 505.5 (last updated, 12/4/08)

_______ 6. Requirements for administration of medications, including a written medication administration record (SPEDP6) 281—IAC 41.404(1)(f), 281—IAC 41.404(3)

Guidance:
IASB Sample Policy: 507.2 (last updated, 12/4/08)

_______ 7. Special health services (SPEDP7) 281—IAC 41.404(1)(g), 281—IAC 41.405(2)

Guidance:
IASB Sample Policy: 507.8 (last updated, 12/4/08)
i. Policy on non-discrimination in employment on the basis of race, color, national origin, gender, disability, age, religion, creed, sexual orientation, and gender identity (EQD1).

 Guidance:
 Employment policies must address each of the 10 specified traits/characteristics.
 IASB Sample Policies: 102, 302.1, 303.2, 401.1, 405.2, 411.2 (all last updated 6/8/07)

 j. Wellness policy (CNP2)

 General Guidance:
The Healthy Hunger Free Kids Act of 2010 (HHFKA) updated the Wellness Policy to include new policy requirements. The 2004 Reauthorization of the USDA Child Nutrition Programs requires establishment of a wellness policy for schools under the local educational agency that contain the components stated below.


 IASB Sample Policy: 507.9 and Appendices (last updated 5/7/12)

 1. The board adopted wellness policy includes goals for: (CNP7)
   a. nutrition education
   b. physical activity
   c. other school-based activities

 Guidance:
The local educational agency determines what goals are appropriate to promote student wellness. As goals are determined, the district is encouraged to consider connections to the physical activity and cardiopulmonary resuscitation course completion requirements contained within Chapter 12 (281—IAC 12.5(19) and 12.5(20)).

 2. The wellness policy includes guidelines selected by the local educational agency for all foods available on each school campus under the local educational agency during the school day with the objectives of promoting student health and reducing childhood obesity (CNP3).

 Guidance:
As guidelines are reviewed and revised, the district is reminded to align these guidelines to the nutritional content standards contained in 281—IAC 58.11, effective July 1, 2010. These standards were developed and adopted to meet requirements contained within the Healthy Kids Act (see Iowa Code 256.7(29)).

 3. Guidelines for reimbursable school meals shall not be 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 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 (CNP4).

 Guidance:
Refer to the current reimbursable school meals guidelines.

 4. The wellness policy establishes a plan for measuring implementation of the policy (CNP5).

 5. The wellness policy includes designation of one or more person(s) within the local educational agency or at each school, as appropriate, charged with the operational responsibility for ensuring that the school meets the local wellness policy (CNP6).
2. **School calendar**
   a. Indicates 180 days of instruction \((\text{CL5}) 281—\text{IAC 12.1(7)}\)
   b. Seniors have 175 days scheduled in the calendar \((\text{CL8}) 281—\text{IAC 12.1(7)}\)
   c. Each school day consists of at least 5.5 hours of instructional time unless otherwise allowed per \(281—\text{IAC 12.1(9)} (\text{MD1}) (\text{MD2} \text{less than 5.5 hours prior to a holiday})\)

**Evidence:**
- a copy of the school calendar
- the daily starting and ending times for each attendance center

If the calendar does not indicate the last day of classes for seniors, the district is asked to provide this information.

\(281—\text{IAC 12.1(9)}\) requires a school day to consist of at least 5 ½ hours of instructional time. If some days contain less than 5 ½ hours of instruction and the remainder of the day is used for professional development as allowed within \(281—\text{IAC 12.1(9)}\), the district is asked to provide this information. Supporting evidence, such as professional development agendas for the day(s) in question, may be requested during the on-site visit.

**Guidance:**
\(281—\text{IAC 12.1(9)}\) allows schools and school districts to count parent-teacher conferences as instructional time, thus count toward the total days of instruction. If the first four consecutive days equal at least 27 ½ hours of instruction because parent-teacher conferences are held beyond the regular school day, the district may record zero hours of instruction on the fifth consecutive day and still count it as a day of instruction (e.g., conferences are held in the evenings on Tuesday and Thursday, Friday can count as a day of instruction even though school is not in session).

Seniors are not required to make up days that are added to the end of the regular adopted calendar due to inclement weather (i.e., "snow days").

Scheduling early dismissals during the first week of school in anticipation of heat is not allowed under Chapter 12. Early dismissal prior to holidays and/or on the last day of a grading period or final day of school are also not allowed under Chapter 12 unless the remainder of the day is used for professional development (see evidence section above). The regularly-scheduled school day may exceed 5½ hours. If this is the case, it is possible for district to schedule an early dismissal and still meet the 5½ hour minimum.

3. **Evidence the board has adopted**
   a. Evaluation criteria for all contracted staff. \(281—\text{IAC 12.3(3), Iowa Code 279.14, Iowa Code 279.23A}\)
      1. Teachers \((\text{EV1})\)
      2. Administrators \((\text{PE6})\)
   b. Evaluation procedures for all contracted staff. \(281—\text{IAC 12.3(3), Iowa Code 279.14, Iowa Code 279.23A}\)
      1. Teachers \((\text{EV2})\)
      2. Administrators \((\text{PE7})\)

**Evidence:**
The criteria and procedures are often found as supporting documents within board policy, but they are not required policies. The evaluation tool itself would provide evidence of the criteria, but may not indicate the procedures (e.g., who is responsible, frequency, etc.).

**Guidance:**
Related IASB Sample Policies: 302.5, 303.6, 405.8, 411.7 (last all updated, 7/11/08)

4. **Evidence** that personnel evaluation criteria and procedures contain an option for intensive assistance is provided to teachers identified as not meeting the district’s expectations related to the Iowa Teaching Standards and Criteria \((\text{EVIA})\). \(281—\text{IAC 83.5(3) and Iowa Code 284.8}\)
5. For districts providing early childhood special education instructional services for preschool children on an Individualized Education Plan (IEP), Iowa Code 279.49, 280.3A
   _____ a. Indicate which of the following preschool program standards, as defined by the Iowa Department of Education, are being implemented.
      1. Iowa Quality Preschool Program Standards (IQPPS);
      2. Head Start Program Performance Standards; or

   _____ b. For districts implementing IQPPS, provide a summary of the activities the district has conducted to implement the Iowa Quality Preschool Program Standards and Criteria.

   Guidance:
   Activities to implement the IQPPS might include completing the IQPPS self-assessment, developing an IQPPS quality improvement plan, and providing professional development for preschool staff serving children on an IEP.

6. Documents pertaining to vocational (career and technical) education programs that provide evidence of the following requirements:
   _____ a. Each program offered is articulated with at least one post-secondary institution (i.e., community college or apprenticeship program) (VED5).

   Evidence:
   The district must provide an articulation agreement for each program. The articulation agreement must be dated within the last five years and reflect current program offerings. Concurrent enrollment agreements with a community college and/or statewide agreements* (when provided by the district) can also fulfill this requirement. Copies of these agreements should be available to the visiting team for review. Providing evidence of how the agreements are publicized to students/parents is also helpful. A completed Program of Study will also be accepted as an articulation agreement. (See DE Program of Study Guidance document at: http://www.educateiowa.gov/index.php?option=com_content&task=view&id=265&Itemid=1428.)

   Guidance:
   If an articulation agreement is outdated, it provides no benefit to the students. If the courses listed on the agreement are no longer offered by the district and/or college, the agreement is not valid as it would no longer benefit students within the program.

   *Statewide articulation agreements exist for the following areas:
   - Accounting
   - Child Development
   - Early Childhood
   - Marketing Field Experience
   - Nutrition
   For more information visit: http://educateiowa.gov/index.php?option=com_content&task=view&id=263&Itemid=1423

   _____ b. An advisory committee/council designed to assist vocational education (Career and Technical education) planning and evaluation composed of public members with emphasis on persons representing business, agriculture, industry, and labor (appointed by the board and meets at least once a year) is in place (VED6). 281—IAC 12.5(5)(i), 281—IAC 46.7(3)

   Please provide the following evidence:
   _____ 1. Committee/council minutes that reflect assistance with CTE planning and evaluation (VED7)
   _____ 2. List of advisory committee members and their representation as it relates to the CTE service areas (VED8)
   _____ 3. List of advisory committee members by gender and race/ethnicity (VED9)
   Iowa Code section 69.16A and section 258.9

   Guidance:
   The CTE advisory committee/council could be incorporated into the SIAC. If this is done, SIAC membership must reflect the representation required for CTE advisory committees/councils. In addition, SIAC minutes must reflect
that the agenda(s) included issues related to each/all of the district’s CTE service areas. The district’s CTE teachers can serve as ex-officio members of the advisory committee but should not be counted toward meeting the committee’s required representation (e.g., the district’s Ag Ed instructor should not be the only person on the committee representing agriculture). If the SIAC also serves as the CTE Advisory Committee, subject-area subcommittees should be established to address Program of Study requirements. It is recommended that the subcommittee consist of 6-8 subject-area experts. (See DE Program of Study Guidance document at: http://www.educateiowa.gov/index.php?option=com_content&task=view&id=265&Itemid=1428.)

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 committee, 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 and gender.

7. Documents which address the following provisions related to gifted and talented student programming, pursuant to 281—IAC 12.5(12)

_____ a. Valid and systematic procedures (GT3), including multiple selection criteria (GT4) for identifying gifted and talented students from the total student population

Evidence:
- Describe the identification criteria and procedures used for each grade level served by the district
- Provide the number of identified gifted and talented students served in elementary (grades 1-6), junior high (grades 7-8), and high school (grades 9-12)

Guidance:
No single criteria should eliminate the student from participation. Criteria should combine subjective and objective data, including data with direct relevance to program goals, objectives, and activities (see 281—IAC 59.5(5)).

_____ b. Goals and performance measures (GT1)

Evidence:
Provide program-level goals and performance measures.

Guidance:
Program goals are not synonymous with goals for individual-identified students’ activities (see 281—IAC 59.5(1)).

_____ c. A qualitatively differentiated gifted and talented program to meet the students’ cognitive and affective needs (GT5)

Evidence:
Provide documentation describing the processes for providing services to meet cognitive and affective needs in the gifted and talented program for each grade level. A linkage between the selection of students, the anticipated student outcomes and the special instructional programs shall be evident.

Guidance:
“Qualitatively differentiated” means learning activities that are beyond the scope of the regular classroom, introduce advanced concepts and contents, and offer students greater latitude of inquiry. This may include, but is not limited to, a specialized curriculum supplementing the regular curriculum, flexible instructional arrangements such as special classes, seminars, resource rooms, independent study, student internships, mentorships, research field trips, and research centers (see 281—IAC 59.5(2)).

Best practice dictates that the services provided for each student placed in a gifted and talented program be contained in a written, personalized gifted and talented plan (see 281—IAC 59.5(4)).
_____ d. Staffing provisions (GT6)

**Evidence:**
A description of how the gifted and talented program will be staffed on an ongoing basis. This could include information such as whether the gifted and talented program will be provided by multiple teachers or by one teacher providing support/instructional services at all levels (see 281—IAC 59.5(7)).

_____ e. In-service design (GT7)

**Evidence:**
A description of how the instructional staff is provided information about, and skills for, individualizing programs for identified gifted and talented learners.

**Guidance:**
Periodic professional development shall be offered for all classroom teachers to maintain and update understandings and skills about individualizing programs for identified G/T students (see 281—IAC 59.5(8)). This could be through stand alone in-services or integrated within district-wide professional development activities. If integrated, evidence should clearly indicate how the G/T aspect is intentionally addressed. Information for this item also provides partial evidence for item #23.a.1.

8. Documents which address the following provisions for meeting the needs of at-risk students, pursuant to 281—IAC 12.5(13):

_____ a. Valid and systematic procedures (AR1) and criteria (AR2) to identify at-risk students throughout the district’s school age population

**Evidence:**
A description of the criteria used and the procedures followed to identify students for each grade level served by the district. This could be evidenced through staff handbooks, response to intervention plans at a core, supplemental and intensive level, and at risk procedures manuals.

**Guidance:**
A minimum of two criteria in the areas of academics, personal/social and career/vocational are required and are locally defined. Districts should be able to show multiple data points that are collected which are valid and reliable and not based on one criterion, biases, perception or assumptions prior to referral for programming. Districts should be able to provide the number of students who are identified as at risk (EASIER Coding – At Risk 1s and 2s) and whether these students are identified and served in early elementary (PK-3), upper elementary (grades 4-5-6), junior high/middle school (grades 6-7-8), and high school (grades 9-12). **Note: At risk indicates a failure to meet goals, not a permanent label.

_____ b. Determination of appropriate ongoing educational strategies for alternative options education programs provided as required in Iowa Code 280.19A (AR3)

**Evidence:**
Appropriate on-going strategies could be listed as services, supports, strategies and/or programs at a supplemental (some students) and intensive (few students) level. Evidence could be in the form of intervention plans and response data (actual names concealed). **Note: Districts could have a manual in regards to their local RTI process. Districts could also include their Tier I interventions/strategies that are provided at a preventative level (all students), but that would be considered their general program, since it would be available for all students (an example of this could be Character Counts).

Alternative options could be listed in a middle/high school handbook, flyers, information brochures, etc. and can be offered at the comprehensive school site or off site. Referral criteria should be a part of this information. A one-size-fits-all alternative program/school or virtual learning environment (i.e.: Plato, E2020) for any identified students should not be the only option. Districts need to provide options that match the need identified in the identification process.

**Guidance:**
Strategies, level of service, and supports provided should match the areas of need identified and the level of need for each student. Alternative options should be in the form of extended learning where the primary acquisition of knowledge and skills through instruction or study outside of the traditional classroom methodology, including, but not limited, to apprenticeships, community service, independent study, online units/courses,
internships, work based, and performing groups.

Note: "Districts that use a Learning Supports framework and have completed resource mapping to identify all services and supports available at all levels for students in need of supports would have a frame of reference for this.

_____ c. Evaluation of the effectiveness of provisions for at-risk students (AR4)

**Evidence**: Evaluation should include individual student programming evaluation and overall program evaluation. Written documents might include a more detailed overall program evaluation of students (individual plans with results listed) and programs (programming plans with results listed for each program, with subgroups broken down, reviewed and overall effectiveness of programming). Note: "Districts that print a copy of their Modified Allowable Growth (MAG) service summary would only be reporting their service summary for a single funding source. Districts must have a comprehensive At Risk Program for any student identified at a local level, therefore the MAG report would only be a portion of the plan.

**Guidance**:

Individual Evaluation: If a student needed to earn credits toward graduation because he was overaged/undercredited then that student's individual program should evaluated, simply is he on track for graduation, is there a plan, transcript analysis. Program Evaluation: To evaluate a credit recovery program, the district would look at the number of credits earned, how long to complete each credit, did students graduate, etc.

Resources for serving students who are at risk are available for download from the DE website at the following link: [http://educateiowa.gov/index.php?option=com_content&view=article&id=418&Itemid=1389](http://educateiowa.gov/index.php?option=com_content&view=article&id=418&Itemid=1389)


9. _____ Programs for returning dropouts and dropout prevention. Boards of school districts, individually or jointly with boards of other school districts, requesting to use modified allowable growth (MAG) for programs for returning dropouts and dropout prevention shall include: Iowa Code section 257.38
   a. Program goals (AR6), objectives, and activities (AR7) to meet the needs of children who may drop out of school.
   b. Student identification criteria and procedures. (AR2)
   c. Staff in-service education design. (AR8)
   d. Staff utilization plans.
   e. Evaluation criteria and procedures and performance measures. (AR4)
   f. Program budget.
   g. Qualifications required of personnel delivering the program.
   h. A provision for dropout prevention and integration of dropouts into the educational program of the district.
   i. A provision for identifying dropouts.
   j. A program for returning dropouts.

**Evidence**:

Provide documentation describing the programming for students identified as returning or potential dropouts. Review of the MAG Application could be acceptable, but the district should have more detailed information at a district level.

**Guidance**:

Modified allowable growth for dropout prevention (MAG-DoP) is not funding that is generated to provide school wide programming to prevent students from becoming at risk. It is intended to be used for providing programming and serving students who left high school and have returned and to prevent those who are most at risk from leaving school, completing school or progressing in school. Funding for these programs focuses on two types of students, returning dropouts and potential dropouts as defined in Iowa Code Section 257.39. These programs are for students identified in one of these two categories: "Returning dropouts" are resident pupils who have been enrolled in a public or nonpublic school in any of the grades seven through twelve who withdrew from school for a reason other than transfer to another school or school district and who subsequently enrolled in a public school in the district. "Potential dropouts" are resident pupils who are enrolled in a public or nonpublic school who demonstrate poor school adjustment as indicated by two or more of the following:
1. High rate of absenteeism, truancy, or frequent tardiness.
2. Limited or no extracurricular participation or lack of identification with school, including but not limited to, expressed feelings of not belonging.
3. Poor grades, including but not limited to, failing in one or more school subjects or grade levels.
4. Low achievement scores in reading or mathematics which reflects achievement at two years or more below grade level.
5. Children in grades kindergarten through three who meet the definition of at-risk children adopted by the department of education.

A variety of resources related to identifying and serving potential and/or returning dropouts is available at: http://educateiowa.gov/index.php?option=com_content&view=article&id=1543&Itemid=2440

10. Documentation regarding the School Improvement Advisory Committee (SIAC) provides evidence of the following:

_____ a. A board appointed SIAC exists (SIAC1). 281—IAC 12.8(1)(a)(2)

**Evidence:**
Board minutes showing appointment of the SIAC should be provided.

**Guidance:**
Chapter 12 does not require the SIAC to be appointed annually; however, each time membership changes (including student representative), board action is required.

281—IAC 12.8(1)(a)(2) also sets the SIAC’s responsibility for analyzing needs assessment data to make recommendations to the board regarding major educational needs, student learning goals, long-term goals, and harassment or bullying prevention goals, programs, training, and other initiatives. Maintaining a summary of the information reviewed by the SIAC and recommendations made to the board regarding these areas is recommended (see the Additional Reference Documents for Site Visit Team section).

**Note:** Meetings of the SIAC fall within Open Meetings requirements.

_____ b. Membership includes students, parents, teachers, administrators, and representatives from the local community (SIAC2). To the extent possible, committee membership has balanced representation of the following: race, gender, national origin, and disability (SIAC6). 281—IAC 12.2, Iowa Code 280.12

**Evidence:**
A list of SIAC members indicating the required membership representation should be provided. If the school district uses the SIAC for other mandated committees (i.e., CTE advisory), the required representation for these committees must also be clearly indicated on the SIAC membership roster.

**Guidance:**
Districts are advised to maintain documentation of efforts to seek membership representation with regard to gender, race, national origin, and disability. Current administrative rules state, “[t]o the extent possible, committee membership shall have balanced representation with regard to race, gender, national origin, and disability.” However, 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 SIAC, defines gender balance as half male and half female for even-numbered committees or half plus one for odd-numbered committees.

_____ c. At least annually (SIAC3), the SIAC makes recommendations to the board with regard to progress achieved with annual improvement goals for the state indicators that address reading, mathematics, and science, progress achieved with other locally determined indicators, and annual improvement goals for the state indicators that address reading, mathematics, and science (SIAC4). 281—IAC 12.8(1)(a)(3)
Evidence:
Presentation of the SIAC’s recommendations to the board should be reflected on board agenda(s) and/or within meeting minutes. Provide a copy of the most recent recommendations addressing the required content that has been presented to the Board.

Guidance:
Providing evidence of recommendations from multiple years is encouraged as it would help assure they are made annually.

______ d. Based on the committee members’ analysis of the needs assessment data, they shall make recommendations to the board about the following components:
  1. Major educational needs;
  2. Student learning goals;
  3. Long-range goals that include, but are not limited to, the state indicators that address reading, mathematics, and science achievement; and
  4. Harassment or bullying prevention goals, programs, training, and other initiatives.

Evidence:
Presentation of the SIAC’s recommendations to the board should be reflected on board agenda(s) and/or within meeting minutes. Provide a copy of the most recent recommendations addressing the required content that has been presented to the Board. (The four components do not need to be addressed annually, but evidence of these components being addressed is required.)

Guidance:
What processes the school or school district used to obtain recommendations from the advisory committee for the board with regard to components #1-4 in rule is locally determined.

### 281—IAC Chapter 12: General Accreditation: Items for Review On-site

11. Attendance center, program, and course enrollment data demonstrating the following:
   ______ a. Attendance center and course enrollment data, disaggregated by gender, racial/ethnic background, and disability (EQ4) are reviewed annually (EQ3). 281—IAC 12.1(1)

Evidence:
The district must provide the following:
- a summary of attendance center, program, and course enrollment-related trends noted over the past three years; and
- a description of how these data are collected and used, with what frequency, by whom, and for what purposes.

The intent is to provide greater clarity regarding how the district is addressing the “reviewed annually” requirement.

Guidance:
Collection of “count” data for the indicated categories is most likely completed through the district’s student management system and partially reported through BEDS. It is appropriate for districts offering multiple sections of content-specific courses at other levels (e.g., grade 8) to provide these data as well as this would help determine equity in student placement practices. It is not uncommon for districts to provide course-level disaggregated data for sex only as this is a common report feature on student management systems, but the requirement is for data to be collected and reviewed for each stated category (i.e., sex, race, and disability).

______ b. Equal opportunity in programs is provided to all students regardless of race, color, national origin, gender (sex), sexual orientation, gender identity, marital status, socioeconomic status, disability, religion, or creed (EQ5). 281—IAC 12.1(1), Iowa Code 280.3
Evidence:
The district must provide the following items:
- district and administrative policies regarding student access to educational programs (policies must address each of the 11 traits/characteristics)
- civil rights grievance procedures
- evidence that a district equity coordinator has been appointed
- a summary of activities conducted by the district’s equity coordinator

Guidance:
If any of the listed evidence pieces is missing, the district will be considered out of compliance with this item.

Related IASB Sample Policies: 102 and 500 (both last updated, 6/8/07)

12. _____ The board policy manual provides evidence policies are reviewed at least every five years (PM3). 281—IAC 12.3(2)

Evidence:
Provide a copy of the board policy manual (or directions for electronic access).

Guidance:
While many districts include the adoption, review, and revision dates on each individual policy, it is not required. These dates might appear on a separate page, such as an index page for each policy series.

Related IASB Sample Policy: 209.6 (last updated, 11/12/99)

13. School counseling program (SCP1) 281—IAC 12.3(11):
   _____ a. program is regularly reviewed and revised and designed to provide
      _____ 1. curriculum that is embedded throughout the district’s overall curriculum (SCP5)

Evidence:
Evidence might include a written guidance curriculum for the grade levels served by the district, a summary of guidance activities by grade level, or similar documentation.

_____ 2. individual student planning designed to help students establish educational and career goals (SCP6)

Evidence:
Evidence might include a summary of guidance activities related to individual student planning, such as completion of core curriculum plans, individual student meetings, and parent/student planning sessions.

_____ 3. responsive services through intervention and curriculum that meet students’ immediate and future needs (SCP7)

Evidence:
Evidence might include a summary of guidance activities such as crisis response, individual or group counseling, and response to referrals.

_____ 4. management activities that establish, maintain, and enhance the total school counseling program (SCP8)

Evidence:
Evidence might include a summary of counselors’ professional development participation, agendas/minutes of guidance advisory meetings, counseling program goals and action plans, and evidence of meetings with instructional and administrative staff.

Guidance:
14. Library program (LP1) 281—IAC 12.3(12):

   a. program is regularly reviewed and revised and designed to provide

   1. methods to improve library collections to meet student and staff needs (LP4)

   Evidence:
   Evidence might include a plan that provides a collection that supports the curriculum, that seeks
   recommendations from students and teachers for the school library collection, and that includes the
   teacher librarian in curriculum review committees.

   2. connections with parents and the community (LP5)

   Evidence:
   Evidence might include newsletter or newspaper articles about services the school library provides, a
   link to the school library web page, or agendas from school board meetings where presentations were
   made about the school library program.

   3. support for the district’s school improvement plan (LP6)

   Evidence:
   Evidence might include a narrative about how the school library program supports the district’s school
   improvement plan, a climate survey that includes student and teacher feedback about the school
   library program, or a completed school library program audit form.

   4. access to or support for professional development for the teacher librarian (LP7)

   Evidence:
   Evidence might include a list of professional development activities related to the school library
   program that the teacher librarian has attended. This might include conferences, professional
   development offered by the AEA, or professional development offered by the district.

   5. current technology and electronic resources (LP8)

   Evidence:
   Evidence might include data or promotional materials about the use of AEA Online materials or local
   resources, evidence of instruction on AEA Online or local resources, or a school library web page
   with links to available online resources.

   6. current and diverse collection of fiction and nonfiction materials in a variety of
   formats (LP9)

   Evidence:
   Evidence might include a selection plan containing procedures to select materials that support district
   curriculum and to provide diverse opinions, as well as procedures to keep the collection current.

   7. a plan for annually updating and replacing library materials, supports, and
   equipment (LP10)

   Evidence:
   Evidence might include an analysis of the school library materials and age of computers and other
   technology located in the school library, a report of the average copyright date of nonfiction and fiction
   books, and an action plan for updating materials and equipment.

Guidance:
The DE website includes several reference documents available for download related to school library programs, including the following:

- “Iowa School Library Program Guidelines - Audit Form with Evidence”
15. Elementary program, grades 1-6 (EPRO1). 281— IAC 12.5(3)  
Documentation that show(s) the following areas are taught in grades 1-6. **Note:** These areas do not have to be separate courses, but they must be taught in each of the grades. The number of minutes dedicated to each area is a local decision.

_____ a. Health  
_____ b. Physical education  
_____ c. Music  
_____ d. Visual art

**Evidence:**  
Master schedules for each grade (1-6) should be provided. Each schedule should be clearly labeled to indicate the grade level. If a required subject area is not specified on the master schedule (e.g., Health), evidence of where the concepts are taught (in EACH grade, 1-6) should be provided. For example, if health content is integrated into science and/or physical education instruction, this information should be provided to the team. This could be done by identifying the content specifications for the content areas in question within the district’s curriculum documents (e.g., standards/benchmarks).

**Guidance:**  
The health content area is often a difficult area to verify as the required concepts are commonly integrated into other subject areas, such as physical education and science. Care must be taken to assure all subject areas are included in each grade, 1-6. 281— IAC 12.5(3)(a)-(i) contains the list of content specifications for each elementary program subject area.

On May 1, 2008, Governor Culver signed a bill mandating the Iowa Core Curriculum, by 2014, for all students in grades K-8. The Iowa Core provides local school districts and nonpublic schools a guide to delivering instruction based on consistent, challenging, and meaningful content to students. The Common Core State Standards in Literacy and Mathematics were integrated into the Iowa Core by Iowa State Board of Education action in 2010. All school districts and accredited nonpublic schools are required to fully implement the Iowa Core in grades K-8 by the 2014-2015 school year. Schools and school districts shall address the curricular needs of students in kindergarten through grade twelve in the areas of twenty-first century learning skills including civic literacy, health literacy, technology literacy, financial literacy, and employability skills. In doing so, schools and school districts shall apply to all curricular areas the universal constructs of critical thinking, complex communication, creativity, collaboration, flexibility and adaptability, and productivity and accountability. 281— IAC 12.5(17) The following link provides access to the Iowa Core.  

16. Junior high program, grades 7 and 8 (JHP1). 281— IAC 12.5(4)  
Documentation (i.e., master schedule) that show(s) the following areas are taught in grades 7 and 8. **Note:** These areas do not have to be separate courses, but they must be taught in each of the grades. The number of minutes dedicated to each area is a local decision.

_____ a. Health  
_____ b. Physical education  
_____ c. Music  
_____ d. Visual art  
_____ e. Family and consumer education  
_____ f. Career education  
_____ g. Technology education

**Evidence:**  
Master schedules for each grade (7 and 8) should be provided. If a required subject area is not specified on the master schedule (e.g., career education), evidence of where the concepts are taught (in EACH grade, 7 and 8) should be provided. For example, if career education content is integrated into multiple courses, this information should be provided to the team. This could be done by identifying the content specifications for the content areas in question within the district’s curriculum documents (e.g., standards/benchmarks).

**Guidance:**  
Health, family and consumer education, career education, and technology education are often difficult areas to verify as the required concepts are commonly integrated into other subject areas versus being offered as stand-
alone courses. Care must be taken to assure all subject areas are included at both grade 7 and 8. 281—IAC 12.5(4)(a)-(k) contains the list of content specifications for each junior high program subject area.

On May 1, 2008, Governor Culver signed a bill mandating the Iowa Core Curriculum for all students by 2014, in grades K-8. The Iowa Core provides local school districts and nonpublic schools a guide to delivering instruction based on consistent, challenging, and meaningful content to students. The Common Core State Standards in Literacy and Mathematics were integrated into the Iowa Core by Iowa State Board of Education action in 2010. All school districts and accredited nonpublic schools are required to fully implement the Iowa Core in grades K-8 by the 2014-2015 school year. Schools and school districts shall address the curricular needs of students in kindergarten through grade twelve in the areas of twenty-first century learning skills including civic literacy, health literacy, technology literacy, financial literacy, and employability skills. In doing so, schools and school districts shall apply to all curricular areas the universal constructs of critical thinking, complex communication, creativity, collaboration, flexibility and adaptability, and productivity and accountability. 281—IAC 12.5(17) The following link provides access to the Iowa Core:

17. Evidence the district has worked with publishers to address Accessible Instructional Materials (AIM) requirements (SPEDA1M1). 281—IAC 12.5(9), 281-41.210(256B,34CFR300)

Evidence:
Copy of materials purchase agreements addressing AIM requirements.

Guidance:
AIM requirements apply regardless of whether the district has students who are blind or who have print disabilities. Numerous reference materials, including a comprehensive reference packet, are available from Iowa’s True AIM website:

18. Physical activity requirement 281—IAC 12.5(19)

a. Documentation that pupils are being provided support to complete the physical activity requirement (PA4) 281—IAC 12.5(19)(d)

Evidence:
Evidence might include printed schedules, district policies, student handbooks, and similar means.

Guidance:
Pupils in kindergarten through grade 5 must engage in physical activity for a minimum of 30 minutes each school day. Pupils in grades 6 through 12 must engage in physical activity for a minimum of 120 minutes per week in which there are at least five days of school.

19. Cardio-pulmonary resuscitation (CPR) course.

a. The school or school district has a documented process through which students’ cardiopulmonary resuscitation requirements are met and verified. (CPR1) 281—IAC 12.5(20)

Evidence:
Evidence might include printed schedules, district policies, student handbooks, student transcripts, student course rosters, or similar means.

Guidance:
Schools may accept proof that a student has completed CPR outside of school. If a school or school district provides the training during the school day, the school or school district may bring in any person from the community or elsewhere who is certified to teach CPR if no one on staff has this certification. A school or school district shall not accept auditing of a CPR course, nor a course in infant CPR only.

20. Documentation regarding implementation of the District Professional Development Plan

Preparation/Evidence:
The items for this section will be reviewed to ensure connection between current practice and the content approved in the district’s CSIP section of C-Plan. If the professional development plan has changed since the district’s CSIP was last approved, the district is asked to provide the rationale for this decision.
**General Guidance:**
A document entitled “Workbook for Describing the District Professional Development Plan” is available for download from the DE website at:
This document includes information for the requirement listed below as well as those required to be included within the district’s CSIP section of C-Plan.

_____ a. To meet the professional development needs of all staff (PD1), professional development activities:
   _____ 1. prepare employees to work effectively with diverse learners and to implement multicultural, gender fair approaches to the educational program (PD4)
   281—IAC 12.7(1)(a)

**Evidence:**
A description of how this requirement is addressed within the district’s professional development program.

**Guidance:**
This requirement can be met through stand alone in-services or integrated within district-wide professional development activities. If integrated, evidence should clearly indicate how these aspects are intentionally addressed.

_____ b. Attendance center professional development plans are in place (ACPD1) that address:
   281—IAC 12.7(1)(b)
   _____ 1. the needs of the teachers in that center (ACPD2.1)
   _____ 2. the Iowa teaching standards (ACPD2.2)
   _____ 3. the district professional development plan (ACPD2.3)
   _____ 4. the student achievement goals of the attendance center and the school district as set forth in the CSIP portion of C-Plan. (ACPD2.4)

**Evidence:**
A copy of the professional development plan for each attendance center (building) should be provided.

**Guidance:**
A document entitled “Building Level Professional Development Plan Workbook” is available from the DE website at:

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**Requirements Outside of Chapter 12: Items for On-Site Review**

**Documents Pertaining to the Education of Homeless Children and Youth**

21. Evidence the board facilitates the enrollment of homeless children of school age, and where appropriate, of preschool age in the public school district, pursuant to 281—IAC 33.

_____ a. The district shall designate an appropriate staff person to serve as the district’s liaison for homeless children and youth to carry out the duties specified in 281—IAC 33.3(7). (HCY5)

**Evidence:**
A copy of board policy or handbook notification.

**Guidance:**
IASB Sample Policy: 501.16 (Last updated, 6/24/05)
b. The district shall examine and revise, if necessary, existing school policies or rules that create barriers to the enrollment of homeless children or youth pursuant to 281—IAC 33.3(3). (HCY6)

Evidence:
A copy of board policy and a statement of procedures ensuring the removal of barriers such as the following which tend to hinder the enrollment of homeless students:
- Immediate enrollment of a homeless child pending dispute resolution 281-IAC 33.3(5)(256)
- Immunization requirements 281-IAC 33.5(256)
- Waiver of fees and charges 281-IAC 33.6(256)
- Waiver of enrollment requirements 281-IAC 33.7(256)
- Residency of homeless child or youth 281-IAC 33.8(256)
- Transportation 281-IAC 33.10(256)

Guidance:
IASB Sample Policy: 501.16 (Last updated, 6/24/05)
Resources can be downloaded from the DE website at http://educateiowa.gov/index.php?option=com_content&task=view&id=422&Itemid=654 (included within the “Resources” section).

_____ c. Locate and identify homeless children or youth within the district, whether or not they are enrolled in school 281—IAC 33.3(1)

1. Evidence the definition of “homeless” is communicated in staff, parent, and student documents (e.g., newsletters and handbooks) (HCY4)

2. Post information, at community shelters and other locations in the district where services or assistance is provided to the homeless, regarding the educational rights of homeless children and youth and encouraging homeless children and youth to enroll in the public school (HCY2). 281—IAC 33.3(2)

Evidence:
A copy of the posting and list of locations where they have been placed within the community should be provided.

Guidance:
The format of the posting is a local decision. Sample postings can be downloaded from the DE website at http://educateiowa.gov/index.php?option=com_content&task=view&id=422&Itemid=654 (included within the “Documents” section).

Guidance:
Chapter 33 of Iowa Administrative Code defines “Homeless child or youth” as a child or youth from the age of 3 years through 21 years who lacks a fixed, regular, and adequate nighttime residence and includes the following:
1. A child or youth who is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; is living in a motel, hotel, trailer park, or camping grounds due to the lack of alternative adequate accommodations; is living in an emergency or transitional shelter; is abandoned in a hospital; or is awaiting foster care placement;
2. A child or youth who has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
3. A child or youth who is living in a car, park, public space, abandoned building, substandard housing, bus or train station, or similar setting; or
4. A migratory child or youth who qualifies as homeless because the child or youth is living in circumstances described in paragraphs “1” through “3” above.
22. ______ Evidence the district has addressed Iowa Department of Education comments provided through PlusCTE regarding the district’s CTE programs. (PERKREP) 281—IAC 12.5(5)(i) and PL109-270, Title I, Sec. 113(b)(2)(A)

   Evidence:
   Evidence could include documentation such as minutes from advisory committee meetings noting discussion of IDOE consultant comments and plans to address these comments or correspondence with IDOE consultants regarding resolution of PlusCTE issues.

   Guidance:
   IDOE CTE consultants enter comments, as needed, regarding CTE program information provided annually by districts through PlusCTE. Districts are asked to work with the CTE program consultant(s) to address these comments. In addition to providing evidence of meeting Chapter 12 “offer and teach” requirements, information provided in Section 2 of PlusCTE provides the link to CTE student data used to meet federal and state reporting requirements.

   Note: If no CTE consultant comments are present in PlusCTE, no further action is needed by the district.

23. ______ Evidence that Perkins activities and expenditures are reviewed or monitored throughout the year. (EDGAR1)

   Evidence:
   Accounting statements and invoices for Perkins expenditures.

   Guidance:
   Any purchases should reflect expenses allowed under Perkins (see EDGAR rules below). If the district is part of a consortium, documentation provided to the Perkins fiscal agent regarding expenditures should be provided. Reference materials, including an equipment inventory template, are available at http://educateiowa.gov/index.php?option=com_content&task=view&id=265&Itemid=1428

24. ______ An inventory list that identifies the equipment purchased with Perkins funds and the equipment’s location. (EDGAR2)

   Guidance:
   The Education Department General Administrative Regulations (EDGAR) Section 74.26(b) requires that “State and local governments shall be subject to the audit requirements contained in the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-7507) and revised OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations.” Section 74.21(a)(b)(1-7) of EDGAR outlined the standards of financial management systems for Perkins.

25. ______ Documentation of identification procedures (ELL1), program placement options (ELL2), and exit criteria (ELL3) for limited English proficient students. 281—IAC 60.3

   Evidence:
   Provide a copy of the district’s ESL plan.

   Guidance:
   This requirement applies regardless of whether the district’s student population includes limited English proficient students. Reference documents regarding education of English language learners are available at: http://educateiowa.gov/index.php?option=com_content&task=view&id=683&Itemid=1391
Documents Pertaining to Equity

These items will be reviewed for all districts receiving site visits, not just those with focused equity visits.

26. _____ Non-discrimination notification statement: annual notification in newspaper or newsletter that goes to all community folks (EQD2). Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV.O and V.C.

**Guidance:**
The non-discrimination notification statement must reflect the protected classes included within the district’s equal opportunity in programs (student) and non-discrimination in employment policies, which also address Iowa Civil Rights legislation requirements. These include race, color, age, national origin, sex, sexual orientation, gender identity, marital status (for programs), socioeconomic status (for programs), disability, religion, and creed.

27. _____ Nondiscrimination notification in major written publications: Parent, student, employee handbooks, registration handbook, coaches’ handbooks, brochures about the district, website, and school newsletters (EQD3). Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV.O and V.C.

**Guidance:**
The non-discrimination notification statement must reflect the protected classes included within the district’s equal opportunity in programs (student) and non-discrimination in employment policies, which also address Iowa Civil Rights legislation requirements. These include race, color, age, national origin, sex, sexual orientation, gender identity, marital status (for programs), socioeconomic status (for programs), disability, religion, and creed.

28. _____ Plan that addresses equal employment opportunity and affirmative action in employment (EQD4). Iowa Code 19B.11, 281—IAC Chapter 95

**Guidance:**
EEO/AA plans must include the following components:
- **Board policy on non-discrimination** in employment and personnel practices on the basis of race, color, national origin, sex, disability, religion, creed, age, marital status, sexual orientation and gender identity
- **Board policy on affirmative action** to hire and retain persons from underrepresented groups in the workforce on the basis of race, national origin, sex, and disability
- **Board policy on harassment and bullying** by/of employees and students on the basis of race, national origin, color, language, sex, sexual orientation, gender identity, marital status, familial status, physical and mental ability or disability, age, religion, creed, physical attributes, ancestry, socioeconomic status, political party preference and political beliefs.
- **Name, position, phone number and e-mail address** of Equal Employment Opportunity/Affirmative Action Coordinator
- **An Administrative statement**, signed and dated by the chief administrative officer, which provides staff with the rationale for the plan, the responsibilities of staff for its implementation, and the internal system for monitoring the implementation of the plan
- **Qualitative Analyses** or periodic self-evaluation of employment and personnel policies and practices for fairness on the basis of race, creed, color, religion, sex, age, national origin, sexual orientation, gender identity, or disability.
- **Qualitative goals** which specify actions with timelines for modifying employment/personnel practices or conditions which have been identified in the self evaluation to contribute to less than equitable access and treatment.
- **Workforce analyses** or profile of the current workforce by race, sex and disability within each major job category
- **Quantitative Analyses** or comparison of the representation of diverse racial/ethnic groups, women, men and persons with disabilities within each major job category in the workforce with their availability in the relevant labor market
- **Numerical goals**, not rigid and inflexible quotas, which reflect realistic aspirations for increasing the numbers of persons from underrepresented groups in the workforce

29. _____ Initial student registration form that includes identification of students’ primary home language (EQD5). *Title VI Civil Rights Act, 281—IAC Chapter 60*

**Guidance:**
281—IAC 60.3(1) states, "In order to determine the necessity of conducting an English language assessment of any student, the district shall, at the time of registration, ascertain the place of birth of each student and whether there is a prominent use of any language(s) other than English in the home." Identification of the students’ primary home language also ties to ESL program requirements (e.g., identification procedures) (see item #33).

### Documents Pertaining to Title I Program

30. Parents Right-to-Know, as pursuant to P.L. 107-110 ESEA Sec. 1111(h)(6) (applies to the entire district that uses Title 1 funds)

______a. District provides annual notification of parent’s “right-to-know” about teacher qualifications. (T11)

**Evidence:**
Evidence could include copies of newsletter or other communications to parents.

**Guidance:**
Parents of students in Title I schools are guaranteed annual notification of their “right to know” about teacher qualifications by their school district. That means parents may request and receive from that office information regarding the professional qualifications of the student’s classroom teachers, including:
- whether the teacher is state-certified
- whether a teacher is teaching under emergency or other provisional status
- the baccalaureate degree major of the teacher and any other graduate degree major or certification
- whether the child is provided services by a paraprofessional and, if so, his/her qualifications


______b. District provides a statement of assurance to parents that notification will occur should their child be taught for four or more consecutive weeks by a teacher who is not highly qualified. (T12)

**Evidence:**
A statement provided to parents in a newsletter or other form of communication.

**Guidance:**

### Documents Pertaining to Title II-D (if applicable to the district)

31. _____ Description of how the district will integrate technology (including software and other electronically delivered learning materials) into curricula and instruction, and a timeline for such integration (T2D1) *Title II-D NCLBA Sec. 2414(b)(7)*

**Evidence:**
Evidence could include the district’s technology plan or other documentation addressing the required content.

32. _____ Locally adopted definition of technological literacy (T2D2) *Title II-D NCLBA Sec. 2414(b)(1)*
Guidance:
There are no specific requirements regarding the district definition of technological literacy; this is a local decision.

33. ______ Assessment method to measure students’ technological literacy by the end of 8th grade (T2D3). Title II-D NCLBA Sec. 2402(b)(2)(A)

Evidence:
Provide a description or copy of the assessment method used by the district to measure students’ technological literacy. The information provided must indicate how proficiency is determined (e.g., cut point or percentage correct).

Guidance:
There are no specific requirements regarding the content of the district’s assessment; this is determined locally. Results of the student assessment are reported annually via Spring BEDS.

Documents Pertaining to Unsafe School Choice Option
(Applicable only if the district has multiple attendance centers at the elementary, middle school, and/or high school levels and a center identified as “persistently” dangerous and/or individual student victims of a violent criminal offense while in or on school grounds)

34. ______ A public elementary or secondary district with multiple attendance centers provides notice of the school transfer option that a student attending a persistently dangerous school or who becomes a victim of a violent criminal offense while in or on the school grounds that the student attends, be allowed to attend a safe school within the district. In addition, the documentation shows verification that the victims’ parents were notified and whether a transfer was offered, accepted, and completed (USCO). NCLB Part E, Sec. 9532, Unsafe School Choice Option 281—IA Chapter 11

Evidence:
Provide a copy of the notification used to inform parents of the school transfer option, the date of the notification, and the actions taken by the parent(s).

Guidance:
281—IA 11.3(1) provides guidelines for determining a persistently dangerous school (“Whole school option”). The Iowa Department of Education, based on district-reported data, provides notification regarding this classification.

281—IA 11.4 provides guidelines for individual student situations (“Individual student option”). For purposes of this rule, a victim of a violent criminal offense is a student who is physically injured or threatened with physical injury as a result of the commission of one or more of the following crimes against the student while the student is in the school building or on the grounds of the attendance center:
1. A forcible felony as defined in Iowa Code chapter 702.11 (this includes felonious child endangerment, assault, murder, sexual abuse, kidnapping, robbery, arson in the first degree, or burglary in the first degree);
2. Offenses, excluding simple misdemeanors, involving physical assault under Iowa Code chapter 708;
3. Offenses, excluding simple misdemeanors, involving sexual assault under Iowa Code chapter 709;
4. Extortion under Iowa Code section 711.4.
Within ten calendar days following the date of the request, a local school district shall offer an opportunity to transfer to the parent/guardian of a student who meets the definition of a victim of a violent crime.

A letter regarding procedures for meeting the Unsafe School Choice requirements was issued to superintendents by the Department in May 2006. A sample letter and a sample notification form are available on the DE website at: http://educateiowa.gov/index.php?option=com_content&view=article&id=680:titleivparta&catid=523:title-iv&Itemid=1663 (see “Supporting Documents” section).
Additional Reference Documents for Site Visit Team

- Building-level school improvement plans, if applicable
- Examples/copies of data reviewed/analyzed by the SIAC when forming recommendations regarding major educational needs, student learning goals, long-term goals, and harassment or bullying prevention goals, programs, training, and other initiatives
- Student achievement data for areas in addition to reading, mathematics, and science, if available
- Trendline data from district-wide assessments other than Iowa Tests
- ACT trendline data, if available
- Data regarding the percentage of students participating in extracurricular and co-curricular activities, if available
- Special Education indicator data
- District curriculum materials, including content standards, benchmarks, grade level indicators, and curriculum maps for all available curricular areas
  - **Note:** In previous years, districts have been asked to provide evidence of adoption of benchmarks for at least reading, mathematics, and science that apply to the grade levels served by the district (281—IAC 12.8(1)(c)(2)) as well as evidence that career education (281—IAC 12.5(7), multicultural, gender fair approaches (281—IAC 12.5(8), and global education (281—IAC 12.5(11)) are incorporated into the educational program.
- High school course handbook/registration guide
- High school master schedule
- Staff, parent, and student handbooks
- Iowa Youth Survey or other surveys conducted within the last five years

Information or Documents Accessible Only to the Site Visit Team Leader

**Items for Review On-site**

35. Personnel files for all staff members (RPL1) 281—IAC 12.4(11)

- a. Personnel files for all non-instructional professional staff, as defined in 281—IAC 12.4(2), contain legal license/certificate or statement of professional recognition (LEF3)

  **Evidence:**
  - Licenses for school nurses (RN), bus drivers (if the district provides its own transportation [CDL or Chauffeur's Class D3 license, Medical Examiner's Certificate, and School Bus Driver's Authorization card]), paraeducators assigned to work in Title I classrooms or Title I school-wide programs, educational sign language interpreters/translators, and coaching certificates for non-teaching coaches should be on file. A random sample of non-instructional professional staff personnel files will be reviewed. This requirement applies to full and part-time staff.

36. Personnel evaluation materials contain **evidence** that:

- a. All contracted staff members are evaluated per local criteria and procedures (EV3). 281—IAC 12.3(3), Iowa Code 279.14, Iowa Code 284.8

  - 1. Evidence that performance review for career (non-beginning) teachers:
    - a. occurs at least once every three years
    - b. directly links to the Iowa Teaching Standards and Criteria
    - c. incorporates classroom observations and review of implementation of teachers’ individual professional development plans
    - d. includes supporting information from multiple sources

  **Evidence:**
  - A copy of the district’s evaluation cycle, if established
  - A copy of the district’s evaluation tool (not sure if this is needed in addition to access to the evaluations)
• Access to teacher evaluation documents should be provided to the site visit team leader to verify date(s) of completion. If copies are not kept within the personnel files, please provide information to the team leader on whom to contact for access.

_____ b. Some form of evaluation of administrators occurs annually (PE8). 281—IAC 12.3(3), 281—IAC 83.12(3), Iowa Code 279.23A.7

______ 1. Evidence the administrator’s evaluator meets annually with the administrator to review progress on the administrator’s professional development plan

______ 2. Evidence that (summative) evaluation for administrators:
   a. occurs at least once every three years
   b. assesses the administrator’s competence in the Iowa standards for school administrators and the goals of the individual administrator’s professional development plan

**Evidence:**
Documentation of administrative (principal and superintendent) evaluation activities (e.g., summative evaluations, board minutes, evidence of annual meetings to review administrator individual professional development plan goals) should be provided to the site visit team leader to verify date(s) of completion. If copies are not kept within the personnel files, please provide information to the team leader on whom to contact for access.

**Guidance:**
Iowa Code 284A.3 states, “By July 1, 2008, each school board shall provide for evaluations for administrators under individual professional development plans developed in accordance with section 279.23A, and the Iowa standards for school administrators and related criteria adopted by the state board in accordance with section 256.7, subsection 27 (note: these are found in 281—IAC 83.10). A local school board may establish additional administrator standards and related criteria.”

Additional information and guidance regarding administrator evaluation requirements is available at: http://educateiowa.gov/index.php?option=com_content&task=view&id=1447&Itemid=2448.

37. Documentation regarding implementation of the District Professional Development Plan

______ a. Individual teacher professional development plans (for those other than beginning teachers) are in place (IPDP.1) that meet the expectations in 281—IAC 83.6(1)

______ 1. based on relevant Iowa teaching standards that support the student achievement goals of the attendance center and district (IPDP2.1)

______ 2. based on the needs of the teacher (IPDP2.2)

______ 3. goals go beyond those required under the attendance center plan (IPDP2.3)

______ 4. are developed by the teacher in collaboration with the teacher’s evaluator (IPDP2.4)

______ 5. an annual meeting is held between the teacher’s evaluator and the teacher to review the goals and refine the plan (IPDP2.5)

**Evidence:**
If copies of individual teacher professional development plans are not kept within employee personnel files, please provide information to the team leader on whom to contact for access.

**Guidance:**
A listing of all instructional staff indicating when each individual’s plan was completed would also be helpful.


38. The system of maintaining student permanent records (SR1) provides evidence of attendance (SR10) and educational progress (SR11). 281—IAC 12.3(4)

______ a. Student permanent records are stored in a fire-resistant safe/vault or maintained and stored electronically with a secure backup file (SR3). 281—IAC 12.3(4)
Evidence:
Attendance and educational progress information should reflect the date the student entered the district and the date the student left as a result of graduation, dropping out, and/or moving. Record of educational progress (i.e., grades) should be evident from the date the student entered through the date they exited the district.

Guidance:
The district is required to adopt a policy regarding accessibility and confidentiality of student records in compliance with FERPA (34 CFR §99) (see item #1a). It is the school's responsibility to ensure this policy is publicized and enforced.

39. _____ The system of maintaining student cumulative records (SR2) provides a continuous and current record of significant information on student progress and growth (SR12). 281—IAC 12.3(4)
_____ a. Student records include a core curriculum plan (SR13) Iowa Code 279.61

Evidence:
Continuous and current student records should be evident for each student currently enrolled in the district. Cumulative records, including core curriculum plans, can be maintained electronically as long as access to these records is available to the appropriate individuals (e.g., teachers with legitimate educational need).

Student core curriculum plans have been required for each student enrolled in grade eight since the 2007-2008 school year. These plans are to be included in the student's cumulative records. At a minimum, plans should be in place within the cumulative records for current ninth through eleventh grade students.

Guidance:
"Continuous and current record" implies information in the files (e.g., grades) should be included from the time the student entered the district (and prior information as applicable). With the exception of core curriculum plans, a check of student files at the highest level served by the district (e.g., high school) usually provides sufficient evidence of maintenance of cumulative files at other levels.

Iowa Code 279.61 states, “For the school year beginning July 1, 2007, and each succeeding school year, the board of directors of each school district shall cooperate with each student enrolled in grade eight to develop for the student a core curriculum plan to guide the student toward the goal of successfully completing, at a minimum, the core curriculum developed by the state board of education pursuant to section 256.7, subsection 26, by the time the student graduates from high school. The plan shall include career options and shall identify the coursework needed in grades nine through twelve to support the student's postsecondary education and career options. … The student's parent or guardian shall sign the core curriculum plan developed with the student and the signed plan shall be included in the student's cumulative records.”

**Desk Audit: Items Available Without Additional Submission**
*Items Reviewed Off-Site by the Team Leader*

40. _____ Evidence reviewed in Fall BEDS verifies the district employs a qualified school counselor (SCP3) 281—IAC 12.3(11)

41. _____ Evidence reviewed in Fall BEDS verifies the district employs a qualified teacher librarian (LP2) 281—IAC 12.3(12)

42. _____ Evidence reviewed in Fall BEDS verifies the district employs a licensed school nurse (SN1) 281—IAC 12.4(12)

43. _____ Evidence reviewed in Fall BEDS verifies all teachers are endorsed/certified for the appropriate grade level (TL1) 281—IAC 12.4(8)

44. _____ Evidence reviewed in Fall BEDS verifies all teachers are endorsed/certified for the appropriate content area (TL2) 281—IAC 12.4(8)
45. Evidence reviewed in Fall BEDS verifies principals are properly licensed (PR1) 281—IAC 12.4(7)

46. Evidence reviewed in Fall BEDS verifies superintendent holds the proper endorsement license/certificate (SPT2) 281—IAC 12.4(4)

47. High school program, grades 9-12 (HSP1) 281—IAC 12.5

Source of Evidence: BEDS, Project EASIER and EdInsight

Guidance:
A “unit of instruction” is a course that is taught for at least 200 minutes per week for 36 weeks or for the equivalent of 120 hours of instruction. With “regular” scheduling, a year-long course is normally the equivalent of one unit of instruction. A semester-length course is normally the equivalent of ½ unit of instruction. With block scheduling, a “block-length” course taught for one semester is usually the equivalent of one unit. The same course taught in two different semesters does not count as two separate partial or full units of instruction.

Courses offered through concurrent enrollment CANNOT be used to meet a district’s minimum program requirements (exception: Career and Technical Education).

On May 1, 2008, Governor Culver signed a bill mandating the Iowa Core Curriculum, by 2012, for all students in grades 9-12. The Iowa Core provides local school districts and nonpublic schools a guide to delivering instruction based on consistent, challenging, and meaningful content to students. The Common Core State Standards in Literacy and Mathematics were integrated into the Iowa Core by Iowa State Board of Education action in 2010. All school districts and accredited nonpublic schools are required to fully implement the Iowa Core in grades 9-12 by the 2012 school year. Schools and school districts shall address the curricular needs of students in kindergarten through grade twelve in the areas of twenty-first century learning skills including civic literacy, health literacy, technology literacy, financial literacy, and employability skills. In doing so, schools and school districts shall apply to all curricular areas the universal constructs of critical thinking, complex communication, creativity, collaboration, flexibility and adaptability, and productivity and accountability. 281—IAC 12.5(17)

The following link provides access to the Iowa Core.

a. English-language arts, six units (HSPELA2) 281—IAC 12.5(5)(a)

b. Social studies, five units (HSPSS2) 281—IAC 12.5(5)(b)

c. Mathematics, six units 281—IAC 12.5(5)(c)
   1. Four sequential units preparatory to postsecondary educational programs (HSPM2) 281—IAC 12.5(5)(c)
   2. Two additional units (HSPM3) 281—IAC 12.5(5)(c)

d. Science, five units (HSPS2) 281—IAC 12.5(5)(d)
   1. Full unit of Chemistry (HSPS3) 281—IAC 12.5(5)(d)
   2. Full unit of Physics (HSPS4) 281—IAC 12.5(5)(d)

e. Health, one unit (HSPH2) 281—IAC 12.5(5)(e)

Guidance:
Full units of chemistry and physics shall be taught but may be offered in alternate years.

Guidance:
It is not uncommon to find a one-semester (1/2 unit) health course (e.g., Health I) offered each semester. This would not meet the “offer and teach” requirement.
Note:
General Health courses are not the same as Health Occupations Education courses; there is a difference in licensure requirements.

_____ f. Physical education, one unit (HSPPE2) 281—IAC 12.5(5)(f)
   _____ 1. A minimum of 1/8 unit of PE is offered and taught each semester (HSPPE3)
   281—IAC 12.5(5)(f)

Guidance:
All physically able students shall be required to participate in the program for a minimum of 1/8 unit each semester they are enrolled except as otherwise provided in 281—IAC 12.5(5)(f). 1/8 unit equates to 900 minutes (50 minutes per week over an 18 week semester). If the district is not providing physical education during each term (semester) and does not have a Department approved physical education waiver, the district is out of compliance. There is no requirement that physical education be taught each period of the day.

_____ g. Fine arts, three units (HSPFA2) 281—IAC 12.5(5)(g)
   _____ 1. Fine arts instruction includes at least two of the following: dance, music, theater, and visual arts (HSPFA3) 281—IAC 12.5(5)(g)

_____ h. Foreign language, four units (HSPFL2) 281—IAC 12.5(5)(h)

Guidance:
The foreign language program shall be a four-unit sequence of uninterrupted study in at least one language. All high schools shall offer and teach the first two units of the sequence. The third and fourth units must be offered. However, the Department of Education may, on an annual basis, waive the third and fourth unit requirements upon the request of the board.

If the district is not teaching the third and/or fourth year of a foreign language and does not have a Department-approved foreign language waiver, the district is out of compliance (HSPFL3).

_____ i. Vocational education (Career and Technical education [CTE]), three units (VED2) in at least four of the six service areas (VED1) 281—IAC 12.5(5)(i)
   _____ Agricultural education
   _____ Business and office education
   _____ Health occupations education
   _____ Home economics education [Family and Consumer Sciences]
   _____ Industrial education
   _____ Marketing education
   _____ 1. A maximum of one “core unit” of instruction is included within the district’s minimum unit count (VED3) 281—IAC 12.5(5)(i)

Evidence:
This information can be obtained from Project Easier Plus CTE. See the Program List and the Courses within a Program – Section 2.

Guidance:
Whether the courses offered and taught for each service include those identified by the district within Project EASIER +CTE to meet Perkins requirements will be verified.

The district must have three units worth of courses (equivalent of three year-long courses) that are clearly related to the CTE areas offered (at least four of the six service areas). Offering two strands in the same service area, such as Drafting and Carpentry within Industrial Education, counts as meeting requirements for just one service area. The courses reported as meeting the program requirement must be offered and taught. If courses are offered within the district, at least one student must be enrolled in each; if courses are offered outside of the district (i.e., via a sharing agreement) at least one student from either district must be enrolled. There is no minimum number of courses that must be taught on-site.

A “core” course can be used to meet a maximum of one of the three minimum unit requirements. A core course is one that can be applied to multiple CTE programs (e.g. Agricultural Education and Business Education).
In general, any certified vocational instructor may teach a core course (e.g., Workplace Readiness); however, if Multi-occupations (MOC) is used as a core course, it must be taught by an instructor who holds the MOC endorsement.

**Note:**
If the district delivers any part of its CTE program through sharing agreement(s) with another district, additional information may be requested during the on-site visit to verify the agreements are functional, including the following:
- Current student enrollment, disaggregated by gender sex, for shared program(s). Provide the enrollment for all districts involved even if the enrollment for one district is zero.
- Course registration guide.
- High school master schedule.
Courses must be advertised to students regardless of where the course is held (i.e., inside or outside the district). The issue here is access; students must be aware of course offerings provided through sharing agreements and must not be discouraged from attending.

Health Occupations/Sciences Education is not the same as general Health courses; there is a difference in licensure requirements.

48. Documentation that the board of education provides special education programs and services for its resident children that comply with rules of the state board of education implementing Iowa Code chapters 256, 256B, 273, and 280. 281—IAC 12.5(9)

**Evidence:**
Information provided by the Area Education Agency to the Department’s Bureau of Student and Family Support Services

______ a. Letter from the Area Education Agency Special Education Director indicating the district is in compliance.
______ 1. All individual student noncompliance issues have been corrected within one year of notification (if applicable) (SECAP1)

**Guidance:**
If the district is required to develop a Special Education Corrective Action Plan (CAP) based on systemic issues identified during IEP compliance reviews, the CAP must be completed according to the action steps, progress measures, and deadlines contained in the CAP. Depending on the nature of the required corrective action, this may be longer than one year. All individual student noncompliance issues must still be corrected within one year of notification.

It is the policy of the Iowa Department of Education not to discriminate on the basis of race, creed, color, sex, sexual orientation, gender identity, national origin, disability, religion, age, political party affiliation, or actual or potential parental, family or marital status in its programs, activities, or employment practices as required by the Iowa Code sections 216.9 and 256.10(2), Titles VI and VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000d and 2000e), the Equal Pay Act of 1973 (29 U.S.C. § 206, et seq.), Title IX (Educational Amendments, 20 U.S.C. §§ 1681 – 1688), Section 504 (Rehabilitation Act of 1973, 29 U.S.C. § 794), and the Americans with Disabilities Act (42 U.S.C. § 12101, et seq.).

If you have questions or complaints related to compliance with this policy by the Iowa Department of Education, please contact the legal counsel for the Iowa Department of Education, Grimes State Office Building, Des Moines, IA 50319-0146, telephone number 515/281-5295, or the Director of the Office for Civil Rights, U.S. Department of Education, 111 N. Canal Street, Suite 1053, Chicago, IL 60606-7204.