PURPOSE OF THE SITE VISIT

The Site Visit Process is set forth in the Code of Iowa 256.11(10) and Iowa Administrative code (Rules) 12.8(4)(a)(2)

• To assess progress with the C-PLAN
• To make recommendations with regard to the visit findings for the purpose of improving educational practices
• To determine that a school or school district is in compliance with the accreditation standards
• To provide a general assessment of educational practices

281—1AC 12.8(4)(a)(2)

Purpose of the Equity Review

1. Office for Civil Rights Compliance
2. Recommendations
3. Inclusive environments
4. School Improvement
FEDERAL MONITORING RESPONSIBILITY

- NCLB
- Title Programs
- Homeless Programs

State Monitoring Requirements
- Chapter 12
- Teacher Quality
- Licensure
- Healthy Kids
- Preschool

Monitoring for both Federal and State
- IDEA
- Equity
- Career/Technical Education
Federal Areas/Equity Citations
• Section 504 of the Rehabilitation Act of 1973
• Title IX of the Education Amendments of 1972
• Title VI Civil Rights Act of 1964
• Office of Civil Rights Guidelines of 1979
• Title II – Americans with Disabilities of 1990

State Legislation
• Chapter 12 – School Standards
• Chapter 280.4 and 60 – English Language Learners
• Chapter 256.11 – Multicultural and Gender Fair Approaches
• Chapter 280.12 – Anti-Bullying and Harassment

Civil Rights Monitoring Process
Office for Civil Rights of the U.S. Department of Education requires state education agencies to develop “Methods of Administration” to reasonably assure that sub-recipients of federal financial assistance are in compliance with federal civil rights laws and to correct areas of non-compliance.
Methods of Administration

Methods of administration are to include:

• State policy reviews
• Desk audits of sub-recipient’s enrollment and staffing data as well as other equity data
• On-site reviews of local education agencies to assess their degree of compliance
• Technical assistance on equity issues
• Biennial program reports to the United States Office for Civil Rights

School Improvement and Equity

• Equity components are incorporated into all school improvement visits
• Blending of two monitoring processes to be as seamless as possible for the district, while maintaining the Department’s responsibility to ensure that educational agencies are adhering to civil rights and equity legislation
• Document review, site visit schedule, and interview groups are coordinated

Selection Criteria

• Course enrollment data in career and technical programs disaggregated by gender, disability and race
• Changing demographics
• Complaints or referrals
• Time elapsed since last equity review
On-Site Review

- Notification in concert with the School Improvement/Accreditation Visit
- Equity Visit Orientation for Districts
- Duration of Site Visit: 3 – 5 days
- Members of the Review Team: 6-15 members, including 3-6 equity team members

Role and Function of Equity Coordinator

- Knowledge of Federal and State Civil Rights Laws
- Board Policies and Administrative Procedures
- Dissemination of Information (Notification)
- Facilitating the Grievance Process
- Professional Development
- Documentation and Record Keeping
- Monitoring and Analysis of Disaggregated Data
- Monitoring Diversity on Advisory Committees

Pre-Visit Preparation Document Review Checklist

The majority of items will be submitted electronically prior to the visit.
Equity Google Site

- The Equity Consultants have a dedicated Google site for the 2013 – 2014 site visit season. Links for individual district/school Google document sites will be available on the Equity Consultant’s Google site. [https://sites.google.com/site/equityvisit20122013/home](https://sites.google.com/site/equityvisit20122013/home)

Equity Related Documents:

- Document Review Checklist
- Equity Related Document Review Checklist

Equity Data Table

- Data not available from any other source
- Excel spreadsheet to be completed by district at least two weeks prior to the visit
On-Site Manual

• Contains information needed to determine compliance with federal and state civil rights laws
• Team will complete before and during the visit through document review and interviews
• Provided as a guide to the district not as a requirement to complete

EdInsight Equity Report

• Purpose is to examine student, employment and course data
• Student and course data disaggregated by gender, race, special education, 504 plan, ELL status and socio-economic status (SES)
• Employment data by gender and race
• Originate from multiple sources
• Available from 2009-2010 forward
• Each district has a trained staff person
• AEA can provide training

2013-2014 Protected Classes Chart

• Nondiscrimination for protected classes
• Program and Employment
• Anti-Bullying and Harassment
• Annual Notice to All Community Members
• Continuous Notice in Major Publications
This is our first glance at the district/school... the anticipatory set

- USE THE 7 THEMES AS AN OUTLINE
- Tell where the district has been, where the district is presently, and what process will be in place for the future

## Community School District Site Visit Schedule

### April 16-20, 2012

<table>
<thead>
<tr>
<th>Time</th>
<th>Team</th>
<th>Event/Activity</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>10:00-11:30</td>
<td>All</td>
<td>Team Orientation/Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>11:30-12:30</td>
<td>All</td>
<td>Lunch</td>
<td>Team Members</td>
</tr>
<tr>
<td>12:30-2:30</td>
<td>All</td>
<td>District Overview &amp; Leadership Team Interview</td>
<td>Dr. Tate, Dr. O'Melia, Ethel Reynolds, Virginia Weipert, Patti Pace, Tracey, Dawn Anderson, Rascher, Gary Sloat, Tom Wagner, Marsha Tangen, Juli Staszewski</td>
</tr>
<tr>
<td>2:30-3:15</td>
<td>All</td>
<td>Break &amp; Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>3:15-4:15</td>
<td>A,B</td>
<td>Career and Technical Education Teachers, PreK-12 General Education Teachers, PreK-12 Special Education Teachers and Collaborating Teachers</td>
<td></td>
</tr>
<tr>
<td>4:15-5:00</td>
<td>All</td>
<td>Break and Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>5:00-6:15</td>
<td>A,B</td>
<td>Parent Interview, School Board Interview</td>
<td></td>
</tr>
</tbody>
</table>

### Day 2

<table>
<thead>
<tr>
<th>Time</th>
<th>Team</th>
<th>Event/Activity</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-9:00</td>
<td>All</td>
<td>Team Dialogue &amp; Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>9:00-10:00</td>
<td>A</td>
<td>Special Education Director</td>
<td></td>
</tr>
<tr>
<td>10:00-11:30</td>
<td>All</td>
<td>Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>11:30-12:30</td>
<td>All</td>
<td>Lunch</td>
<td>Team Members</td>
</tr>
<tr>
<td>12:30-2:30</td>
<td>All</td>
<td>Break &amp; Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>3:15-5:00</td>
<td>All</td>
<td>Break and Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>5:00-6:00</td>
<td>A,B</td>
<td>Local School Improvement Advisory, Career and Technical Education Advisory, Title I Advisory</td>
<td></td>
</tr>
</tbody>
</table>

### Day 3

<table>
<thead>
<tr>
<th>Time</th>
<th>Team</th>
<th>Event/Activity</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-9:00</td>
<td>All</td>
<td>Team Dialogue &amp; Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>9:00-11:00</td>
<td>A,B</td>
<td>Site visit to alternative school, Site visit to preschool</td>
<td></td>
</tr>
<tr>
<td>11:30-12:30</td>
<td>All</td>
<td>Lunch</td>
<td>Team Members</td>
</tr>
</tbody>
</table>

### Day 4

<table>
<thead>
<tr>
<th>Time</th>
<th>Team</th>
<th>Event/Activity</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-12:00</td>
<td>All</td>
<td>Team Dialogue &amp; Document Review</td>
<td>Team Members</td>
</tr>
<tr>
<td>12:00-1:30</td>
<td>All</td>
<td>Exit Report</td>
<td></td>
</tr>
</tbody>
</table>
Required Interview Groups

All required groups from School Improvement, plus additional:

- Equity Coordinator(s)
- Middle and High School Counselors
- English As A Second Language Teacher(s)
- Athletic Director, Coaches and PE Teachers
- Human Resource Coordinator
- Physical Facilities Staff

Building Accessibility Tour

- District will submit the list of all buildings in the 2013-2014 Educational Equity Review Data Table
- District will complete the ADA Checklist
- The Physical Facilities Staff and the DE Consultant will tour the facilities

Accessibility Standards

Important to use the correct standards for when the building/addition/renovation was constructed
### Accessibility Standards by Date

<table>
<thead>
<tr>
<th>STANDARD</th>
<th>DATES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Readily Accessible (Existing Facilities)</td>
<td>Prior to June 4, 1977</td>
</tr>
<tr>
<td>A117.1-1961 (R 1971)</td>
<td></td>
</tr>
<tr>
<td>Uniform Federal Accessibility Standards (UFAS)</td>
<td>January 18, 1991 to January 26, 1992</td>
</tr>
<tr>
<td>1991 Title II Americans with Disabilities Act (ADA) or UFAS</td>
<td>January 27, 1992 to September 14, 2010</td>
</tr>
<tr>
<td>1991 ADA or UFAS or 2010 ADA</td>
<td>September 15, 2010 to March 14, 2012</td>
</tr>
<tr>
<td>2010 ADA</td>
<td>March 15, 2012</td>
</tr>
</tbody>
</table>

### Existing Facilities

- U.S. Dept of Education, Office for Civil Rights (OCR) considers facilities constructed prior to June 4, 1977 as existing facilities.
- Facilities constructed after June 4, 1977 are considered new construction.

### Title II of the ADA-Nondiscrimination on the Basis of Disability by Public Entities

- Two parts:
  - State and local governments
  - Public transportation
- Prohibits all public entities – even those independent from federal funding – from discriminating against people with disabilities.
- USDOE Office for Civil Rights (OCR) enforces Title II in public elementary and secondary education, higher education, and vocational education.
- People with disabilities are assured of access to all programs and services provided by state and local government agencies.
Public school systems must ensure that programs, services, and activities are accessible to and usable by individuals with disabilities.

Both Title II of the ADA and Section 504 prohibit school systems from denying people with disabilities equal opportunity to participate in programs, services, and activities because their facilities are inaccessible to, or unusable by, them.

School districts do not have to make all classroom buildings accessible to students with disabilities.

Programs in inaccessible classroom buildings must be also available in other accessible schools in the district.

Accessible schools must be comparable in convenience to those available to students without disabilities.

Both structural and nonstructural methods of achieving program accessibility are acceptable.

Reassignment of services to an accessible location.

Purchase, redesign, or relocation of equipment.

Assignment of aides.

Structural changes to eliminate barriers.
• Title II of the ADA and Section 504 require covered entities to operate each program so that, when viewed in its entirety, the program is readily accessible to and usable by people with disabilities.
• Must make programs and activities accessible unless the school district can demonstrate that required modifications would result in a fundamental alteration of the program or in undue financial and administrative burdens.
• Neither regulation requires a barrier free environment if there is program accessibility.

Existing Facilities

New or Altered Facilities

• New construction and alterations require focus on providing physical access to buildings and facilities rather than on providing access to programs and services.

Transition Plans

• School systems must develop a transition plan that documents identified structural barriers and how they will be removed.
  – List physical barriers in facilities that limit accessibility to programs, activities, or services.
  – Describe methods to remove barriers to make facilities accessible.
  – Develop schedule and timeline to achieve Title II compliance – if longer than one year, identify interim steps for each year.
  – Identify official responsible for plan’s implementation
FACILITY CHECKLIST for Equity Site Visits

- Parking
- Passenger Loading Zones
- Exterior Route of Travel
- Ramps
- Stairs
- Lifts
- Entrances

- Elevators
- Rooms and Spaces
- Restrooms
- Shower Rooms
- Assembly Areas
- Cafeterias
- Libraries
- Lobbies and Corridors

Resources

- The U.S. Department of Justice website at: www.ada.gov site provides copies of the Title II regulations

U.S. Access Board

(800) 872-2253 (voice)
(800) 993-2822 (TTY)

E-mail: ta@access-board.gov
www.access-board.gov
Office for Civil Rights (OCR)

- The OCR office for Iowa is located at:
  - Chicago Office
    - Office for Civil Rights
    - U.S. Department of Education
    - Citigroup Center
    - 500 W. Madison Street, Suite 1475
    - Chicago, IL 60661
  - Telephone: 312-730-1560
  - FAX: 312-730-1576; TDD: 877-521-2172
  - Email: OCR.Chicago@ed.gov

- The OCR National Headquarters is located at:
  - U.S. Department of Education
    - Office for Civil Rights
    - Lyndon Baines Johnson Department of Education Bldg
    - 400 Maryland Avenue, SW
    - Washington, DC 20202-1100
  - Telephone: 800-421-3481
  - FAX: 202-453-6012; TDD: 877-521-2172
  - Email: OCR@ed.gov

On The Last Day of the Visit

- School Improvement Consultant and Equity Consultant will meet with Superintendent at the end of the visit to share noncompliances
- Team shares highlights of strengths and recommendations with Superintendent and other school staff

Post Review Activities

- Letter of Findings/Equity Report From On-Site Review
- Voluntary Compliance Plan
- Monitoring and Follow-up Visit
- Close Equity File
REPORTING FORMAT
Seven Characteristics of Improving Schools

1. Vision, Mission, and Goals
2. Leadership
3. Collaborative Relationships
4. Learning Environment
5. Curriculum and Instruction
6. Professional Development
7. Monitoring and Accountability

In most cases, each of the seven characteristics will contain strength statement and recommendation statements.

Non-Compliance issues will be in a matrix at the end of the report and in WEB-BASED format.

The Data Appendix will be added to the final report.

Letter of Findings Equity Report Format

Seven Sections of Equity On-Site Manual:

• Equity Policy and Process
• Equity, School Improvement and the Educational Program
• Physical Education, Extra-Curricular Activities and Athletics
• Access, Integration and Inclusion
• Support Services for Special Populations
• Climate and Discipline
• Employment, Personnel, and Advisory Committees

Letter of Findings/Equity Report

• Strength Statements
• Recommendations for Improvement
• Noncompliance issues – in a chart in the report
• Draft reports may be sent to team members and will be reviewed internally by DE staff
• The school improvement and equity consultant will collaborate and finalize
• The final determination of the equity noncompliances will be made by DE staff
• Final equity report will be sent to the district/school within 60 calendar days

Voluntary Compliance Plan

• The LEA will develop a voluntary compliance plan (VCP) addressing any non-compliance issues and send the plan to the DE within 60 calendar days of the date of the Letter of Finding
• The Equity Consultant will notify the LEA if revisions to the plan are needed and will approve the final plan

Plan Components

• Noncompliances will be provided in the Letter of Finding in the sample format in Appendix A
• VCP must contain the statement of noncompliance; district action plan to remedy each of the areas of noncompliance; the evidence of correction that will be submitted; the staff person(s) responsible for each action; and a reasonable projected timeline for completing the action, including the month and year. The plan must be signed and dated by superintendent.
Monitoring and Follow Up

- Documentation of evidence of remedies will be submitted to the equity consultant
- A follow up visit to monitor completion of all items, including accessibility, will occur about a year after the visit

Consequences of Continued Non-Compliance

- In the event a district does not submit a voluntary compliance plan, or does not show good faith effort to complete its voluntary compliance plan, the State Director, on behalf of the State Board, will take one of the following actions:
  - Notify the U.S. Department of Education Office for Civil Rights
  - Notify the Iowa Civil Rights Commission or the Attorney General’s Office
  - Inform the school accreditation process

Close Equity File

- When all noncompliance items in the VCP are completed, the equity file will be closed at the DE and the district will receive notice
- However, the Office for Civil Rights can re-open files at any time
Iowa Department of Education Website

- Equity Education Link on the Website:


Contact

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Equity Consultant  
Iowa Department of Education  
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Cell: 515-402-2739  
Email: margaret.jensenconnet@iowa.gov

Questions